

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Otsego Township Dam Area - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #24  
Progress  
Otsego Township Dam Area  
059B  
Otsego Township, MI  
Latitude: 42.4601694 Longitude: -85.7199333

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**From:** Paul Ruesch, OSC

**Date:** 9/15/2017

**Reporting Period:** 9/2/2017 - 9/15/2017

1. Introduction

1.1 Background

<b>Site Number:</b>	059B	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	4/6/2016
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	PRP Oversight
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	NPL	<b>Operable Unit:</b>	5
<b>Mobilization Date:</b>	8/1/2016	<b>Start Date:</b>	8/1/2016
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	MID006007306	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	DEQ
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	059B

1.1.1 Incident Category

Time Critical Removal Action - PRP Oversight

1.1.2 Site Description

See PolRep #1

1.1.2.1 Location

See PolRep #1

1.1.2.2 Description of Threat

See PolRep #1

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See PolRep #1

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Demobilization of equipment is complete and restoration continues in BRSA 4. Removal operations continue in BRSA 6 and are underway in BRSA 9. Hydraulic dredging of a pilot channel to support removal and restoration operations in BRSA 7 & 8 commenced.

2.1.2 Response Actions During Reporting Period

BRSA 4

- Completed transportation and disposal of contaminated soils & sediments;
- Completed backfilling, grading and stabilization of river banks; and
- Continued removal and restoration of stabilization pad, staging area, and access road.

#### **BRSA 6**

- Excavation of contaminated soils continues with excavation completed and confirmation results received in riverbank grids and stream tube grids shown in the table below. There are 54 total grids in BRSA 6, with each grid consisting of approximately 50 lineal feet of riverbank. There are 4 stream tubes, with each stream tube varying in size. The target clean-up goal in the riverbank soils is 5 mg/kg total PCBs and in-stream sediments is 1mg/kg total PCBs; and
- Continued transportation and disposal of contaminated soils and sediments.

Estimated excavation depths and confirmation sampling results are found below for riverbank grids in BRSA 6 (Table 1) and adjacent stream tube grids (Table 2).

<b>BRSA 6 RIVERBANK GRID</b>	<b>TOTAL ESTIMATED EXCAVATION DEPTH (in)</b>	<b>FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)</b>
9	46	0.47
10	58	0.32
11	40	2.6
12	41	0.64
13	34	0.61
14	28	0.63
15	32	4.2
16	TBD	TBD
17	32	4.6
18	33	3.9
19	31	4.5
Table 1. BRSA 6 Riverbank Grid Confirmatory Sampling Results		

<b>BRSA 6 STREAM TUBE</b>	<b>TOTAL ESTIMATED EXCAVATION DEPTH (in)</b>	<b>FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)</b>
17D-9	41	0.079
14E-29	36	0.067
14E-30	36	<0.03
14E-31	36	0.76
14E-32	36	0.18
Table 2. BRSA 6 Stream Tube Confirmatory Sampling Results		

Table Notes: Confirmatory sampling takes place immediately following excavation of contaminated soils and/or sediments in

accordance with procedures outlined in the FSP and the TM for BRSA 4, 5, 6 & 9. Both documents can be found in the 'Documents' Section of the project website. Stream Tube grids are numbered consistent with the riverbank grid they are located adjacent to. A figure showing the location of both (preliminary) riverbank grids and stream tubes can be found on Figure 8 of the BRSA 4, 5, 6 & 9 TM.

#### BRSA 9

- Completed construction of staging area and stabilization pad;
- Completed start up and testing of WWTP;
- Continued construction of coffer dam systems;
- Commenced removal of contaminated riverbank soils & sediments at Pine Creek / Kalamazoo River confluence (see photo).

#### BRSA 7 & 8

- Deployment, set-up and testing of hydraulic dredging rig and associated equipment which will be used to construct a 'pilot channel' in front of temporary WCS. The 'pilot channel' will establish a new deep area in the river for the majority of river water to flow, which will enable removal and restoration operations on riverbanks;
- Completed construction and isolation of the old river channel downstream of old auxiliary spillway in preparation for filling with hydraulic dredge slurry (mixture of clean sand and water); and
- Installed turbidity curtain downstream of temporary WCS and old auxiliary spillway to control downstream turbidity (cloudiness in water caused by sand/dirt/clay particles) which may result from hydraulic dredging operations.

#### OVERALL SITE

- Transport/disposal of approximately 2578 tons of excavated soils to an EPA-approved landfill facility (see Section 2.1.4).
- Daily particulate monitoring (PM10) around the site perimeter with no sustained exceedance off site of particulates above the action level of 1.5 mg/m3;
- Turbidity control measures and monitoring in Kalamazoo River around the BRSA 3 - 9 excavation area (1 upstream monitor and 2 downstream monitors), with no sustained exceedance of the action level of 50 NTUs above upstream levels. Crews are preparing to move the downstream turbidity monitors further downstream to monitor during hydraulic dredging operations in BRSA 7 & 8.
- Treatment of approximately 30,400 gallons of contact water from contaminated grids and contaminated soils staging pads in on-site WWTPs located in BRSA 6 & 9 (see Section 2.1.4). Sampling results from the WWTPs continues to confirm non-detect levels for total PCBs in treated water; and
- Monitoring of the temporary WCS.

#### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

See PolRep #1

#### **2.1.4 Progress Metrics**

Both quantities during the reporting period ('Quantity' column) and totals to date ('Total' column) are included in the table.

<i><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Total</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>
Cardboard	solid	40 lbs	990 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	20 lbs	385 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	50 lbs	10,960 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	2,578 tons (est)	22,420 tons (est)	various	disposal	Republic Ottawa County Farms Landfill, Coopersville, MI
Contaminated soil (> 50 ppm* PCBs)	solid	0 tons	103.91 tons	various	disposal	US Ecology Michigan, Belleville, MI
Contact water	liquid	30,400 gal	1,055,097 gal	NA	on-site WWTP	On-site reuse/discharge to Kalamazoo River

\*Note: 1 ppm = 1 mg/kg

## **2.2 Planning Section**

### **2.2.1 Anticipated Activities**

During the next reporting period, the following activities are expected to occur:

#### BRSA 4

- Restore access area off Lincoln Road (M-89);
- Commence restoration with native plantings; and
- Restore/secure staging area.

#### BRSA 6

- Continue excavation of contaminated riverbank soils & in-stream sediments;
- Treat contact water from contaminated grids & contaminated soils staging pad; and
- Transport contaminated soils & sediments for disposal.

#### BRSA 9

- Complete drawdown of Pine Creek impoundment and re-install stop logs at water control structure;
- Complete excavation of riverbank and in-stream sediments at Pine Creek confluence;
- Remove temporary dam and restore area at Pine Creek confluence;
- Excavate of contaminated riverbank soils & in-stream sediments;

- Treat contact water from contaminated grids & contaminated soils staging pad; and
- Transport contaminated soils & sediments for disposal.

#### SITEWIDE

- Operate dust and turbidity control/monitoring systems; and
- Maintain/monitor temporary WCS.

#### **2.2.1.1 Planned Response Activities**

See Sections 2.2.1 & 2.2.1.2

#### **2.2.1.2 Administrative Activities / Next Steps**

- AMEC-FW continues to hold meetings to resolve outstanding issues and concerns on the draft TM for BRSAs 7 & 8.
- AMEC-FW submitted a monthly progress report itemizing all site activities conducted in August 2017. All monthly reports submitted since inception of the project are posted in the 'Documents' section of the project website.
- A land use permit was issued by MDNR to facilitate hydraulic dredging operations near the temporary WCS and filling operations near the auxiliary spillway.

#### **2.2.2 Issues**

- Additional dredging was necessary within several riverbank grids in BRSA 6 due to elevated levels of PCBs being encountered during confirmation sampling at initially targeted depths.

### **2.3 Logistics Section**

See PolRep #1

### **2.4 Finance Section**

No information available at this time.

### **2.5 Other Command Staff**

#### **2.5.1 Safety Officer**

A safety meeting is held prior to work start each day. The meeting is led by on-site safety officer(s) from Envirocon & AMEC-FW.

#### **2.5.2 Liaison Officer**

- A tour was provided for MDEQ personnel and senior managers on September 6 (see photo).
- The Allegan County Sheriff's Office will begin providing assistance with traffic control on public roads in the vicinity of construction access areas.

#### **2.5.3 Information Officer**

- A sign was posted on a traffic barricade at the public boat launch on Pine Creek to inform the public that water levels are being drawn down to facilitate dredging on the Kalamazoo River. The public is advised not to launch boats there as trailers may become stuck in the mud.
- A path commonly used by the public to access the Kalamazoo River off River Road downstream of the old auxiliary spillway was fenced off to prevent access to an active construction area while hydraulic dredging operations are underway.

## **3. Participating Entities**

### **3.1 Unified Command**

### **3.2 Cooperating Agencies**

See PolRep #1

## **4. Personnel On Site**

On average, the following personnel were present on site during the reporting period:

US EPA - 1  
 START - 1  
 Michigan DNR - 1  
 Michigan DEQ - 1  
 Envirocon - 42  
 Milbocker & Sons, Inc. - 3  
 White Lake Dock & Dredge, Inc. - 4  
 AMEC-FW - 3  
 Spicer Group - 1

TOTAL: 57

## **5. Definition of Terms**

AMEC-FW	AMEC Foster Wheeler
BRSA	Bank Removal and Stabilization Area
FSP	Field Sampling Plan
mg/kg	milligrams per kilogram
MDEQ	Michigan Department of Environmental Quality
MDNR	Michigan Department of Natural Resources
OSC	On Scene Coordinator
PCBs	Poly-chlorinated biphenyls

PolRep	Pollution Report
ppm	parts per million
PRP	Potentially Responsible Party
START	Superfund Technical Assessment & Response Team (US EPA contractor)
TM	Technical Memorandum
US EPA	United States Environmental Protection Agency
WCS	Water Control Structure
WWTP	Waste Water Treatment Plant

## **6. Additional sources of information**

### **6.1 Internet location of additional information/report**

<http://www.epaosc.org/otsegodam>

[www.epa.gov/superfund/allied-paper-kalamazoo](http://www.epa.gov/superfund/allied-paper-kalamazoo)

### **6.2 Reporting Schedule**

The next PolRep will be generated on September 29.

## **7. Situational Reference Materials**

No information available at this time.