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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #28**
Progress
Otsego Township Dam Area
059B
Otsego Township, MI
Latitude: 42.4601694 Longitude: -85.7199333

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From: Paul Ruesch, OSC
Date: 11/10/2017
Reporting Period: 10/28/2017 - 11/10/2017

1. Introduction

1.1 Background

Site Number:	059B	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	4/6/2016
Response Authority:	CERCLA	**Response Type:**	PRP Oversight
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	NPL	**Operable Unit:**	5
Mobilization Date:	8/1/2016	**Start Date:**	8/1/2016
Demob Date:		**Completion Date:**	
CERCLIS ID:	MID006007306	**RCRIS ID:**	
ERNS No.:		**State Notification:**	DEQ
FPN#:		**Reimbursable Account #:**	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
Removal operations were completed in BRSA 6 and are near completion in BRSA 9. Hydraulic dredging of a pilot channel to support removal and restoration operations in BRSAs 7 & 8 was completed. Construction of access roads and sheet piling in BRSAs 7 & 8 continues. All stop logs were removed from the temporary WCS.

2.1.2 Response Actions During Reporting Period

BRSAs 3 & 4

- Re-planted trees and shrubs impacted by elevated water levels.

BRSA 6
- Excavation of contaminated soils was completed with confirmation results shown in Table 1. There were 54 total grids in BRSA 6, with each grid consisting of approximately 50 lineal feet of riverbank. There were 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;
- Restoration of riverbanks along excavated grids;
- Maintenance, cleaning and activated carbon change out in WWTP (see Section 2.2.1.2); and
- Continue transportation & disposal of contaminated soils and sediments.

The estimated excavation depth and confirmation sampling result is found below for the final riverbank grid (Table 1).

BRSA 6 RIVERBANK GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
54	24	1.1

Table 1. BRSA 6 Riverbank Grid 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 BRSAs 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.

BRSAs 7 & 8
- Hydraulic dredging was completed to construct a 'pilot channel' in front of the temporary WCS;
- Hydraulic dredging equipment was removed from the river and demobilized from the site;
- Completed construction of sheet pile coffer dam system along BRSA 7 riverbank (see photo);
- Completed drawdown of water levels by removing all stop logs from temporary WCS, with concurrence from MDEQ & MDNR, allowing better access for construction along the riverbanks;
- Continued construction of access roads along riverbanks; and
- Maintenance & monitoring of turbidity curtain downstream of temporary WCS and old auxiliary spillway to control downstream turbidity.

BRSA 9
- Excavation of contaminated soils continued with excavation completed and confirmation results received in riverbank grids and stream tube grids shown in the tables below. There are 38 total river bank grids in BRSA 9, with each grid consisting of approximately 50 lineal feet of riverbank. There are now 3 stream tubes, with each stream tube varying in size, as an extra stream tube was added adjacent to river bank grids 30-32. 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 9 (Table 2), and stream tube grids (Table 3).

BRSA 9 RIVERBANK GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
30	12	< 0.031
31	12	TBD
32	12	TBD

33	12	TBD
34	12	TBD
35	12	TBD
36	6	0.76
37	6	0.092
38	6	0.064

Table 2. BRSA 9 Riverbank Grid Confirmatory Sampling Results

BRSA 9 STREAM TUBE	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
12A-30	12	< 0.037
12A-31	TBD	TBD
12A-32	TBD	TBD
11A-33	TBD	TBD
11A-34	12	< 0.079
11A-35	12	0.15
11A-36	12	0.16
11A-37	12	< 0.038

Table 3. BRSA 9 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 BRSAs 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.

OVERALL SITE
- Transport/disposal of approximately 168 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 the Kalamazoo River downstream of project area (1 upstream monitor and 2 downstream monitors), with no sustained exceedance of the action level of 50 NTUs;
- Treatment of approximately 111,450 gallons of contact water from contaminated grids and contaminated soils staging pads in on-site WWTPs located in BRSAs 6 & 9 (see Section 2.1.4). Sampling results from the WWTPs in BRSAs 6 & 9 continue to show non-detect levels for PCBs in the treated discharge; and
- Monitoring of the temporary WCS. All stop logs were removed to lower water levels.

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.

Waste Stream	*Medium*	*Quantity*	*Total*	*Manifest #*	*Treatment*	*Disposal*
Cardboard	solid	20 lbs	1080 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	50 lbs	475 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	9480 lbs	21,720 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	168 tons (est)	30,451 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	111,450 gal	1,632,126 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 6
- Continue backfilling & restoration of excavated riverbank grids;
- Treat contact water from contaminated grids & contaminated soils staging pad;
- Remove sand bag and sheet pile coffer dams; and
- Continue transport contaminated soils & sediments for disposal.

BRSAs 7 & 8
- Continue access road construction along river banks;
- Complete construction of sheet pile coffer dams; and
- Begin excavation of contaminated soils & sediments.

BRSA 9
- Complete excavation of remaining riverbank grids and stream tubes;
- Continue backfilling & restoration of excavated riverbank grids;
- 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
- Discussions continue on proposed plans to remove the temporary WCS and restore the area.
- AMEC-FW submitted final draft TM for BRSAs 7 & 8 to US EPA for review on October 27. The document was approved on October 30.

- AMEC-FW submitted a letter to MDEQ on November 1 with formal notification of non-compliance and corrective action for the WWTP in BRSA 6. The document can be found in the 'Documents' section of the project website. An exceedance to the discharge limit of ND was previously reported incorrectly as 0.29 ppm total PCBs. The actual exceedance was detected at 0.29 ppb total PCBs. The activated carbon was replaced and WWTP operations have been returned to normal.

2.2.2 Issues

High water levels resulting from excessive rainfall events continues to slow progress as repairs & maintenance were needed along riverbanks prior to re-starting work.

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 by on-site safety officer(s) from Envirocon & AMEC-FW.

2.5.2 Liaison Officer

The Allegan County Sheriff's Office dive team conducted a training for all site personnel on proper planning, equipment and tactics for conducting a river rescue on November 2 (see photo).

2.5.3 Information Officer

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
MDNR - 1
MDEQ - 1
Envirocon - 44
White Lake Dock & Dredge, Inc. - 3
Milbocker & Sons, Inc. - 4
SWAT - 2
AMEC-FW - 3
Spicer Group - 1

TOTAL: 61

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
ND	Non-Detect
OSC	On Scene Coordinator
PCBs	Poly-chlorinated biphenyls
PolRep	Pollution Report
ppm	parts per million
ppb	parts per billion
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

6.2 Reporting Schedule

The next PolRep will be generated on November 24.

7. Situational Reference Materials

No information available at this time.