

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #29  
Progress  
Otsego Township Dam Area  
059B  
Otsego Township, MI  
Latitude: 42.4601694 Longitude: -85.7199333

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**From:** Paul Ruesch, OSC

**Date:** 11/24/2017

**Reporting Period:** 11/11/2017 - 11/24/2017

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

Removal operations are near completion in BRSA 9. Construction of access roads in BRSA 8 is near completion. Sheet piling operations are complete in BRSA 7, with access road construction commencing.

2.1.2 Response Actions During Reporting Period

BRSA 6

- Restoration continues along riverbanks (see photo); and

- Continue transportation & disposal of contaminated soils and sediments.

#### BRSA 7

- Removed turbidity curtain downstream of temporary WCS and old auxiliary spillway; and
- Continued maintenance of stream tube protection measures to prevent erosion (see photo).

#### BRSA 8

- Continued construction of access roads along riverbanks; and
- Continued maintenance of stream tube protection measures to prevent erosion (see photo).

#### BRSA 9

- Excavation of contaminated soils continued with excavation continues with 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 3 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 and stream tubes in BRSA 9 (Tables 1 & 2).

<b>BRSA 9 RIVERBANK GRID</b>	<b>TOTAL ESTIMATED EXCAVATION DEPTH (in)</b>	<b>FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)</b>
31	12	TBD
32	12	TBD
33	12	TBD
34	12	0.26
35	12	0.12
Table 1. BRSA 9 Riverbank Grid Confirmatory Sampling Results		

<b>BRSA 9 STREAM TUBE</b>	<b>TOTAL ESTIMATED EXCAVATION DEPTH (in)</b>	<b>FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)</b>

12A-31	TBD	TBD
12A-32	TBD	TBD
11A-33	TBD	TBD
Table 2. 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 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.*

#### OVERALL SITE

- Transport/disposal of approximately 301 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. Turbidity control measures were removed downstream of the temporary WCS now that pilot channel construction operations are complete. Turbidity monitors are currently being relocated now that pilot channel construction activities are completed and turbidity control measures have been removed downstream of the temporary WCS;
- Treatment of approximately 63,890 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 in BRSA 6 & 9 continue to show non-detect levels for PCBs in the treated discharge. Both WWTPs are being winterized to allow for operation in freezing temperatures; and
- Monitoring of the temporary WCS. All stop logs remain removed from the structure.

#### 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.

<b>Waste Stream</b>	<b>Medium</b>	<b>Quantity</b>	<b>Total</b>	<b>Manifest #</b>	<b>Treatment</b>	<b>Disposal</b>
Cardboard	solid	20 lbs	1100 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	10 lbs	485 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	0 lbs	21,720 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	301 tons (est)	30,752 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	63,890 gal	1,696,016 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;
- Continue removal of sand bag and sheet pile coffer dams; and
- Continue transport contaminated soils & sediments for disposal.

#### BRSA 7 & 8

- Continue access road construction along river banks; 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 (see photo). It is expected that a draft proposal will be submitted to US EPA in mid-December for review.
- A monthly progress report for October was submitted by AMEC-FW. Detailed monthly activity reports are posted in the 'Documents' section of the website each month (see Section 6.1).

### **2.2.2 Issues**

- Field sampling is being planned for several grids in BRSA 7 to confirm the need for remediation excavation in areas with high banks and coarse sediments.

## **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**

A tour was provided to representatives of MDNR & MDEQ on November 16.

### **2.5.3 Information Officer**

An article with an update on progress appeared in the local Otsego Union Enterprise newspaper on November 17.

## **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  
 Milbocker & Sons, Inc. - 3  
 SWAT - 4  
 AMEC-FW - 3  
 Spicer Group - 1

TOTAL: 59

## **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
PRP	Potentially Responsible Party
START	Superfund Technical Assessment & Response Team (US EPA contractor)
TM	Technical Memorandum
UAO	Unilateral Administrative Order
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 December 8.

## **7. Situational Reference Materials**

No information available at this time.