

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #30
Progress
Otsego Township Dam Area
059B
Otsego Township, MI
Latitude: 42.4601694 Longitude: -85.7199333

To: Douglas Ballotti, EPA
Samuel Borries, EPA
Mike Ribordy, EPA
Jim Saric, EPA
Mark Mills, MDNR
Polly Synk, MDAG
Cyndi Trobeck, City of Otsego
Valincia Darby, U.S. DOI

From: Paul Ruesch, OSC

Date: 12/8/2017

Reporting Period: 11/25/2017 - 12/8/2017

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 continue along with riverbank restoration in BRSA 9. Construction of access roads in BRSA 8 was completed. Removal operations are underway in BRSA 7. Winterization of WWTPs in BRSA 6 & 9, which will treat contact water from BRSA 7 & 8, respectively, is complete (see photos).

2.1.2 Response Actions During Reporting Period

BRSA 6

- Restoration continues along riverbanks;
- Winterization of WWTP (see photo); and
- Removal of sheet piling containment areas.

BRSA 7

- Excavation of contaminated soils and sediments is underway with confirmation results received in riverbank grids and stream tube grids shown in the tables below. There are 63 total river bank grids in BRSA 7, with each grid consisting of approximately 50 feet of riverbank. There are 3 stream tubes, with each varying in size. The target clean-up goal in riverbank soils is 5 mg/kg total PCBs and in-stream sediments is 1mg/kg total PCBs;
- Commenced transportation and disposal of contaminated soils and sediments (utilizing the staging pad in BRSA 6);
- Continued maintenance of stream tube protection measures to prevent erosion; and
- Field sampling was conducted within several grids (19-26 and 52-63) to confirm the need for remediation excavation in areas with high banks and coarse sediments.

Estimated excavation depths and confirmation sampling results are found below for riverbank grids and stream tubes in BRSA 7 (Tables 1 & 2).

BRSA 7 RIVERBANK GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
1*	36*	1.1*
2	48	1.3
3	48	0.35
4	48	< 0.071
5	48	< 0.067
Table 1. BRSA 7 Riverbank Grid Confirmatory Sampling Results		

**Note: Result shown is for Grid #54 of BRSA 6, which was extended to encompass Grid #1 of BRSA 7 for logistical purposes.*

BRSA 7 STREAM TUBE	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
11E-1*	18*	< 0.075*
Table 2. BRSA 7 Stream Tube Confirmatory Sampling Results		

**Note: Result shown is for stream tube #11E, grid #54 of BRSA 6, which was extended to encompass stream tube #11E, grid #1 of BRSA 7 for logistical purposes.*

General 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 7 & 8. 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 1-7 of the BRSA 7 & 8 TM.

BRSA 8

- Completed construction of access roads along riverbanks; and
- Continued maintenance of stream tube protection measures to prevent erosion.

BRSA 9

- Excavation of contaminated soils 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;
- Winterization of WWTP (see photo); and
- Continued transportation and disposal of contaminated soils & sediments.

Estimated excavation depths and confirmation sampling results are found below for riverbank grids and stream tubes in BRSA 9 (Tables 3 & 4).

BRSA 9 RIVERBANK GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
31	12	TBD
32	12	TBD
33	12	1.1
Table 3. BRSA 9 Riverbank Grid Confirmatory Sampling Results		

BRSA 9 STREAM TUBE	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT
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		(mg/kg)
12A-31	TBD	TBD
12A-32	TBD	TBD
11A-33	12	0.94

Table 4. 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 3-3 of the BRSA 4, 5, 6 & 9 TM.

OVERALL SITE

- Transport/disposal of approximately 1,578 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. New locations were secured for upwind and downwind monitors as removal work gets underway in BRSA 7 & 8;
- 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 15,000 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). The WWTP in BRSA 6 is now treating contact water from BRSA 7 removal operations. The WWTP in BRSA 9 will treat contact water from BRSA 8 removal operations. Both WWTPs have been winterized (see photos). Sampling results from the WWTPs in BRSA 6 & 9 continue to show non-detect levels for PCBs in the treated discharge; 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.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Total</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Cardboard	solid	50 lbs	1150 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	20 lbs	505 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	3,880 lbs	25,600 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	1,578 tons (est)	32,330 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	15,000 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 restoration of excavated riverbank grids; and
- Continue staging pad and WWTP operations to support removal operations in BRSA 7.

BRSA 7

- Continue access road construction along riverbanks;
- Continue excavation of contaminated riverbank soils and in-stream sediments;
- Treat contact water from contaminated grids, stream tubes and staging pad (located in BRSA 6); and
- Transport contaminated soils & sediments for disposal.

BRSA 8

- Begin excavation of contaminated riverbank soils and in-stream sediments;
- Treat contact water from contaminated grids, stream tubes and staging pad (located in BRSA 9); and
- Transport contaminated soils & sediments for disposal.

BRSA 9

- Complete excavation of remaining riverbank grids and stream tubes;
- Complete backfilling & restoration of excavated riverbank grids;
- Treat contact water from contaminated grids & contaminated soils staging pad;

- Continue staging pad and WWTP operations to support removal operations in BRSA 8; 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

- Planning discussions continue with respect to removal of the temporary WCS and restoration of the area.

2.2.2 Issues

- Cold weather and high winds causes minor delays in work progress during the reporting period.

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

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
 Milbocker & Sons, Inc. - 3
 AMEC-FW - 3
 Spicer Group - 1

TOTAL: 55

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.epaossc.org/otsegodam>

www.epa.gov/superfund/allied-paper-kalamazoo

6.2 Reporting Schedule

The next PolRep will be generated on December 22.

7. Situational Reference Materials

No information available at this time.