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

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**Region V**

**Subject:** **POLREP #33**
**Progress**
**Otsego Township Dam Area**
**059B**
**Otsego Township, MI**
**Latitude: 42.4601694 Longitude: -85.7199333**

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**From:** Paul Ruesch, OSC
**Date:** 1/19/2018
**Reporting Period:** 1/6/2018 - 1/19/2018

## 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 in BRSA 7 and commenced in BRSA 8. Removal of the temporary WCS is underway.

#### 2.1.2 Response Actions During Reporting Period

BRSA 6
- Staging area maintenance.

BRSA 7

- Excavation of contaminated soils and sediments continues with confirmation results received in riverbank grids and stream tube grids shown in Tables 1 & 2 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;
- Continued transportation and disposal of contaminated soils and sediments (utilizing the staging pad in BRSA 6); and
- Continued maintenance of stream tube protection measures to prevent erosion.

| BRSA 7 RIVERBANK GRID | TOTAL ESTIMATED EXCAVATION DEPTH (in) | FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg) |
|---|---|---|
| 10 | 48 | 3.5 |
| 11 | 48 | 2.4 |
| 62 | 6 | 0.83 |
| 63 | 6 | 1.5 |

Table 1. BRSA 7 Riverbank Grid Confirmatory Sampling Results

| BRSA 7 STREAM TUBE | TOTAL ESTIMATED EXCAVATION DEPTH (in) | FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg) |
|---|---|---|
| 09E-8 | 36 | 0.21 |
| 09E-9 | 36 | 0.33 |
| 09E-10 | 36 | < 0.091 |
| 09E-11 | 36 | < 0.065 |
| 09E-12 | 36 | < 0.067 |

Table 2. BRSA 7 Stream Tube Confirmatory Sampling Results

*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 BRSAs 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

- Excavation of contaminated soils commenced (see photo), with confirmation results received in the stream tube grids shown in the Table 3 below. There are 63 total river bank grids in BRSA 8, 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;
- Continued maintenance of stream tube protection measures to prevent erosion; and
- Transportation and disposal (see photo) of contaminated soils & sediments commenced (utilizing the staging pad in BRSA 9).

| BRSA 8 STREAM TUBE | TOTAL ESTIMATED EXCAVATION DEPTH (in) | FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg) |
|---|---|---|
| 07A-23 | 6 | < 0.065 |
| 07A-24 | 6 | < 0.071 |

| | | |
|---|---|---|
| 07A-25 | 6 | < 0.072 |
| 02A-49 | 6 | < 0.038 |
| 02A-50 | 6 | < 0.046 |
| 02A-51 | 6 | < 0.057 |
| 02A-52 | 6 | < 0.068 |
| 02A-53 | 6 | < 0.075 |
| 02A-54 | 6 | < 0.073 |

Table 3. BRSA 8 Stream Tube Confirmatory Sampling Results

*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 BRSAs 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 1-8 of the BRSA 7 & 8 TM.*

BRSA 9
- Staging area maintenance; and
- Completed transportation & disposal of contaminated soils/sediment excavated from BRSA 9.

OVERALL SITE
- Transport/disposal of approximately 2,105 tons of excavated soils to an EPA-approved landfill facility (see Section 2.1.4);
- Daily particulate monitoring (PM10) around the site perimeter (when feasible given cold weather conditions) with no sustained exceedance off site of particulates above the action level of 1.5 mg/m3;
- Turbidity monitoring utilizing a hand held monitoring instrument with no sustained exceedances;
- Treatment of approximately 36,000 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 both WWTPs continue to show non-detect levels for PCBs in the treated discharge; and
- Removal of the temporary WCS is underway (see photo).

**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 | 1210 lbs | NA | recycling | Otsego Recycling Center |
| Plastic | solid | 10 lbs | 535 lbs | NA | recycling | Otsego Recycling Center |
| Steel | solid | 0 lbs | 27,560 lbs | various | recycling | Broken Arrow Recycling |
| Contaminated soil (< 50 ppm* PCBs) | solid | 2,105 tons (est) | 36,156 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 | 36,000 gal | 1,782,476 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 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
- Continue 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
- Continue staging pad and WWTP operations to support removal operations in BRSA 8.

SITEWIDE
- Operate dust and turbidity control/monitoring systems (as feasible & necessary); and
- Continue removal of the 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**
- Approval was confirmed by US EPA for disposal of contaminated soils/sediments at the C&C Landfill in Marshall, Michigan on January 12. This facility may be utilized by the general contractor for future disposal needs.
- A proposed work plan for removal of the temporary WCS and restoration of the surrounding area was received from AMEC-FW on January 12. The work plan was approved by US EPA on January 19.
- A land use permit was issued by MDNR for the removal component of the proposed work plan for removal of the temporary WCS on January 18. A land use permit will be issued by MDNR for the restoration component of the proposed work plan once design plans are submitted, reviewed and approved.
- A post-construction inspection report for the M-89 bridge over the Kalamazoo River was provided to MDOT on January 19. There were no observed impacts to the structure as a result of the project.
- Both pre-construction and post-construction inspection reports for the Pine Creek water control structure were provided to the Allegan County Drain Commissioner on January 19. There were no observed impacts to the structure as a result of the project.

**2.2.2 Issues**
- AMEC-FW and US EPA are reviewing the practicability of proposed riverbank grid and stream tube excavation in BRSA 7. It is anticipated that due to pre-construction sampling results, geomorphologic considerations, and stream bank stability concerns, several areas may not be excavated. On January 24, US EPA determined that riverbank grids 19-24 and 51-61 would not be subject to excavation. All BRSA 7 riverbank grids will still be restored consistent with the restoration plan.

**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. An accident report was completed for a crew member who cut their hand while installing insulation during WWTP winterization activities.

**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 - 33
Milbocker & Sons, Inc. - 4
Toads Tree Service - 2
Spicer Group, Inc. - 1
AMEC-FW - 2

TOTAL: 46

**5. Definition of Terms**

| | |
|---|---|
| AMEC-FW | AMEC Foster Wheeler |
| BRSA | Bank Removal and Stabilization Area |
| MDNR | Michigan Department of Natural Resources |
| MDOT | Michigan Department of Transportation |
| NTU | Nephelometric Turbidity Unit |
| OSC | On Scene Coordinator |
| PCB | Polychlorinated Biphenyl |
| PM | Particulate Matter |
| PolRep | Pollution Report |
| PRP | Potentially Responsible Party |
| START | Superfund Technical Assessment & Response Team (US EPA contractor) |
| 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 February 2.

## 7. Situational Reference Materials

No information available at this time.