

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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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 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

- 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 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 1-8 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 BRSA 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.