

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #34
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: 2/2/2018

Reporting Period: 1/20/2018 - 2/2/2018

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 BRSA 8. Removal of the temporary WCS continues.

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 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)
13	48	3.8
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-13	36	0.12
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 continues, with confirmation results received in riverbank and stream tube grids shown in Tables 3 & 4 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
- Continued transportation and disposal of contaminated soils and sediments (utilizing the staging pad in BRSA 9).

BRSA 8 RIVERBANK GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
1	6	< 0.03
2	6	< 0.031
3	6	0.16
4	6	0.11
5	6	0.22
6	6	0.13
7	6	0.44

8	6	4.0
9	12	3.3
10	12	0.20
11	12	0.58
12	12	< 0.047
13	12	< 0.050
19	24	< 0.034
20	24	< 0.043
21	24	< 0.059
22	24	< 0.061

23	24	< 0.065
24	24	< 0.071
25	24	< 0.072
45	24	0.41
46	24	1.4
47	36	< 0.066
49	48	< 0.038
50	36	0.073
51	36	0.089
52	6	2.4

53	6	TBD
54	36	TBD
60	6	0.89
61	6	0.25
62	6	1.9
63	6	1.9
Table 3. BRSA 8 Riverbank Grid Confirmatory Sampling Results		

BRSA 8 STREAM TUBE	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
07A-19	6	< 0.034

07A-20	6	< 0.043
07A-21	6	< 0.059
07A-22	6	< 0.061
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.

OVERALL SITE

- Transport/disposal of approximately 3,719 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) 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 21,020 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 continues (see photo of sheet pile removal on north side).

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	1230 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	10 lbs	545 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	20 lbs	27,560 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	3,719 tons (est)	39,875 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	21,020 gal	1,803,496 gal	NA	on-site WWTP	On-site reuse/discharge to Kalamazoo River

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

- 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.
- MDNR will be issuing a project advertisement requesting for demolition of the auxiliary spillway located adjacent to the temporary WCS the week of February 5.
- MDOT permits for warning signage posted on M-89 at 1) 106th Street, 2) 19th Street, and 3) at the Kalamazoo River bridge (BRSA 3 entrance) were amended to extend the expiration date. This warning signage is still necessary as slow trucks continue to enter the highway.

2.2.2 Issues

- Verification sampling is needed in BRSA 7 in the vicinity of riverbank grids 41-43 to confirm the presence of PCB contaminated soils with concentrations > 50 ppm, which were detected in a historical sample. The sampling will be conducted consistent with Section 2.7 of the draft FSP.
- Residents raised the concern of truck speeds on 19th Street, which provides access to the BRSA 6 staging area. All drivers were put on notice to respect the posted speed limit of 12 mph on 19th Street.

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

MDNR responded to an inquiry for a tour of the temporary WCS removal by a reporter from the Allegan News / Otsego Union Enterprise on February 1.

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 - 35
Milbocker & Sons, Inc. - 4
Spicer Group, Inc. - 1
AMEC-FW - 2

TOTAL: 46

5. Definition of Terms

AMEC-FW	AMEC Foster Wheeler
BRSA	Bank Removal and Stabilization Area
FSP	Field Sampling Plan
MDNR	Michigan Department of Natural Resources
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 16.

7. Situational Reference Materials

No information available at this time.