

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #35  
Progress  
Otsego Township Dam Area  
059B  
Otsego Township, MI  
Latitude: 42.4601694 Longitude: -85.7199333

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**From:** Paul Ruesch, OSC

**Date:** 2/16/2018

**Reporting Period:** 2/3/2018 - 2/16/2018

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 continue in BRSA 7 & 8. Removal of the temporary WCS continues.

2.1.2 Response Actions During Reporting Period

BRSA 7

- Excavation of contaminated soils and sediments continues with confirmation results received in the riverbank grid shown in Table 1 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 RESULT (Total PCBs,mg/kg)
12	48	0.54

Table 1. BRSA 7 Riverbank Grid Confirmation 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 grids shown in Table 2 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;

- 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 RESULT (Total PCBs, mg/kg)
9*	12*	1.5*
14	12	0.17
15	12	0.37
16	24	0.071
17	24	0.14
18	24	0.26
19	24	<0.035
20	24	<0.041
21	24	<0.067
22	24	<0.066
23	24	<0.068
24	24	<0.067
36	24	4.8
37	24	<0.068
38	24	<0.064
41	24	<0.037
42	24	<0.061
43	24	<0.064
44	24	<0.067
48	48	<0.067
53	6	<0.067
54	36	<0.069
55	36	0.098
56	36	0.97
57	36	<0.073
58	36	0.45
59	36	0.35

Table 2. BRSA 8 Riverbank Grid Confirmation 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.

\* Grid 9 was further excavated as the results of split sampling by START resulted in a value > 5 mg/kg. The results reported were taken after the grid was excavated an additional 6 inches.

**OVERALL SITE**

- Transport/disposal of approximately 1,691 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 31,060 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 photos). Half of the structure has been successfully removed.

### 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	0 lbs	1230 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	0 lbs	545 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	0 lbs	27,560 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	1,691 tons (est)	42,082 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	31,060 gal	1,834,556 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. Crews will commence removal of the remaining half of the structure from the south side of the Kalamazoo River.

### 2.2.1.1 Planned Response Activities

See Sections 2.2.1 & 2.2.1.2

### 2.2.1.2 Administrative Activities / Next Steps

- Design plans for restoration of the area around the temporary WCS were submitted to US EPA and MDNR on February 16. A land use permit will be issued by MDNR for the restoration component of the proposed work plan once the design plans are reviewed and approved.

### 2.2.2 Issues

- Repeated winter storms and hazardous road conditions caused suspension of dredging activities in BRSA 7 & 8 on February 12. Removal activities will continue as soon as possible. Work continues on removal of the temporary WCS.

## 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

A news article highlighting the removal of the temporary WCS appeared the Allegan News and Otsego Union Enterprise on February 8.

## 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:

START - 2  
MDNR - 1  
MDEQ - 1  
Envirocon - 32  
Milbocker & Sons, Inc. - 3  
Spicer Group, Inc. - 1  
AMEC-FW - 2

TOTAL: 42

## 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

<https://response.epa.gov/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 March 2.

## 7. Situational Reference Materials

No information available at this time.