

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #37
Progress
Otsego Township Dam Area
059B
Otsego Township, MI
Latitude: 42.4601694 Longitude: -85.7199333

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From: Paul Ruesch, OSC

Date: 3/16/2018

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

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 in BRSAs 7 & 8 resumed on March 12 after record high water levels receded. Removal of the temporary WCS resumed from the south side of the river.

2.1.2 Response Actions During Reporting Period

BRSA 7

- Additional excavation of contaminated soils continued 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;
- Transportation and disposal of contaminated soils & sediments (utilizing the staging pad in BRSA 6); and
- Maintenance and repair of stream tube protection measures and access roads.

BRSA 7 RIVERBANK GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION RESULT (Total PCBs, mg/kg)
63	12	< 0.036

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 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 and sediments continues, with confirmation results received in riverbank grids and stream tubes shown in Tables 2 & 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;
- Transportation and disposal of contaminated soils & sediments (utilizing the staging pad in BRSA 9); and
- Maintenance and repair of stream tube protection measures and access roads.

BRSA 8 RIVERBANK GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION RESULT (Total PCBs, mg/kg)
26	48	0.36
27	48	< 0.033
28	48	< 0.037
29	48	0.15
30	48	< 0.067

Table 2. BRSA 8 Riverbank Grid Confirmation Sampling Results

BRSA 8 STREAM TUBE GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION RESULT (Total PCBs, mg/kg)
33	12	< 0.079
34	12	< 0.067

Table 3. BRSA 8 Stream Tube 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 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.

OVERALL SITE

- Transport/disposal of approximately 2120 tons of excavated soils to an EPA-approved landfill facility (see Section 2.1.4);
- 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 13,280 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;
- Temporary WCS removal activities resumed on the south bank of the river as weather conditions improved and high water levels receded (see photo); and
- Bank re-grading and restoration continues on the north bank of the river at the temporary WCS (see photo). The temporary WCS corridor is being restored in consultation MDEQ & MDNR (see photo) pursuant to an approved 'Application/Permit to Use State Land.'

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	1270 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	10 lbs	565 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	0 lbs	27,560 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	2120 tons (est)	44,282 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	13,280 gal	1,847,836 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

- Staging pad and WWTP operations to support removal operations in BRSA 7.

BRSA 7

- 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

- Staging pad and WWTP operations to support removal operations in BRSA 8.

SITEWIDE

- Operate dust and turbidity control/monitoring systems (as feasible & necessary);
- Repair and re-construction of riverbanks and restoration planting in all BRSAs impacted by record high water levels; and
- Continue removal of temporary WCS and restoration of surrounding area.

2.2.1.1 Planned Response Activities

See Sections 2.2.1 & 2.2.1.2

2.2.1.2 Administrative Activities / Next Steps

- MDNR issued an updated 'Application/Permit to Use State Land' for riverbank and channel restoration activities in the area surrounding the temporary WCS on March 15.

2.2.2 Issues

2.3 Logistics Section

See PolRep #1

2.4 Finance Section

2.4.1 Narrative

See PolReps #3 and #7. The estimated direct costs below only reflect those incurred by US EPA and START. They do not include costs incurred by the PRPs or their contractors.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
START	\$1,065,000.00	\$993,000.00	\$72,000.00	6.76%
Intramural Costs				
US EPA - Direct	\$250,000.00	\$192,000.00	\$58,000.00	23.20%

US EPA - Indirect	\$200,000.00	\$166,000.00	\$34,000.00	17.00%
Total Site Costs	\$1,515,000.00	\$1,351,000.00	\$164,000.00	10.83%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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

- Information on the status of the project was provided by CIC Diane Russell at community meeting held at the Otsego Public Library on March 10.

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:

USEPA - 1
 START - 1
 MDNR - 1
 MDEQ - 1
 Envirocon - 42
 Milbocker & Sons, Inc. - 4
 Spicer Group, Inc. - 1
 AMEC-FW - 2

TOTAL: 53

5. Definition of Terms

AMEC-FW	AMEC Foster Wheeler
BRSA	Bank Removal and Stabilization Area
CIC	Community Involvement Coordinator
FSP	Field Sampling Plan
MDEQ	Michigan Department of Environmental Quality
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

6.2 Reporting Schedule

The next PolRep will be generated on March 30.

7. Situational Reference Materials

No information available at this time.

