

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #41  
Progress  
Otsego Township Dam Area  
059B  
Otsego Township, MI  
Latitude: 42.4601694 Longitude: -85.7199333

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**Date:** 5/11/2018

**Reporting Period:** 4/28/2018 - 5/11/2018

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 and restoration operations continue in BRSA 8.

2.1.2 Response Actions During Reporting Period

BRSA 6

- Commence removal of contaminated soil & sediment staging pad.

**BRSA 7**

- Excavation of contaminated soils and sediments continues (see photo) with confirmation results received in the riverbank grids and stream tube grids 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);
- Completed construction of contaminated soil staging pad;
- Completed construction of contact water storage tanks and secondary containment;
- Continued construction of access roads to provide access into remaining grids and stream tubes; and
- Maintenance of stream tube protection measures.

BRSA 7 RIVERBANK GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION RESULT (Total PCBs, mg/kg)
50	12	2.1
51E*	12	1.2
51W*	12	0.88

Table 1. BRSA 7 Riverbank Grid Confirmation Sampling Results

BRSA 7 STREAM TUBE GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION RESULT (Total PCBs, mg/kg)
50	24	0.065
51E*	24	0.045
51W*	24	0.87

Table 2. BRSA 7 Stream Tube Grid Confirmation Sampling Results

**General Table Notes:**

\* Grid 51 needed to be split into 2 grids for access & construction purposes

- 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**

- Continue re-grading and restoration of riverbanks.

**OVERALL SITE**

- Transport/disposal of approximately 1068 tons of excavated soils to an EPA-approved landfill facility (see Section 2.1.4);
- Dust control measures and particulate monitoring (PM10) around the site perimeter with no sustained exceedance off-site of particulates above the action level of 1.5 mg/m3;
- No sustained exceedances observed in turbidity monitors;
- Treatment of approximately 27,600 gallons of contact water from contaminated grids and/or contaminated soils staging pad in the on-site WWTP located in BRSA 6 (see Section 2.1.4). Sampling results continue to show non-detect levels for PCBs in the treated discharge; and
- Continued restoration activities (grading, contouring) of area and river bed at former temporary WCS (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	30 lbs	1420 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	20 lbs	625 lbs	NA	recycling	Otsego Recycling Center
Metals	solid	250 lbs	40,676 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	1068 tons (est)	49,596 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	27,600 gal	2,013,046 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

- Complete removal of staging pad and begin restoration of surrounding area;
- Remove remaining sheet pile and demobilize crane; and
- Dismantle and remove WWTP.

#### BRSA 7

- Continue access road construction along riverbanks into remaining riverbank grids and stream tubes;
- Continue excavation of contaminated riverbank soils and in-stream sediments;
- Re-construct and restore riverbanks;
- Collect contact water from contaminated grids, stream tubes and staging pad in temporary storage tanks;
- Transport contact water for treatment at off-site WWTP (see Section 2.2.1.2); and
- Transport contaminated soils & sediments for disposal.

#### BRSA 8

- Re-construction and restoration of riverbanks.

#### SITEWIDE

- Operate dust and turbidity control/monitoring systems;
- Commence river channel contouring with specialized excavator; and
- Continue restoration of area surrounding the former temporary WCS and auxiliary spillway.

### **2.2.1.1 Planned Response Activities**

See Sections 2.2.1 & 2.2.1.2

### **2.2.1.2 Administrative Activities / Next Steps**

- AMEC-FW requested approval to ship contact water for off-site treatment at Liquid Industrial Waste in Holland, MI (MID 006 546 121) on May 1. The facility is in compliance with the CERCLA Off-Site Rule and is acceptable for off-site treatment/disposal. Licensed hauler(s) will be used to transport contact water from on-site storage tanks to the facility.
- On May 9, comments were provided to AMEC-FW on a draft outline of the final report to be submitted at conclusion of project.

### **2.2.2 Issues**

- Trespassing into work areas has increased with the Spring weather conditions. Site security was increased and personnel will be patrolling all construction areas during off hours and weekends.

## **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**

- A site tour was provided to an interested neighbor on April 30.
- A presentation was made at the Otsego Historical Society on May 10.

### **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:

USEPA - 1  
START - 1  
MDNR - 1  
MDEQ - 1  
Envirocon - 40  
Milbocker & Sons, Inc. - 3  
Spicer Group, Inc. - 1  
AMEC-FW - 2

TOTAL: 50

## **5. Definition of Terms**

AMEC-FW	AMEC Foster Wheeler (Wood Group)
BRSA	Bank Removal and Stabilization Area
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](http://www.epa.gov/superfund/allied-paper-kalamazoo)

### **6.2 Reporting Schedule**

The next PolRep will be generated on May 25.

## **7. Situational Reference Materials**

No information available at this time.