

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #50
Final
Otsego Township Dam Area
059B
Otsego Township, MI
Latitude: 42.4601694 Longitude: -85.7199333

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From: Paul Ruesch, OSC

Date: 3/26/2020

Reporting Period: 8/1/2019 - 3/26/2020

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:	8/15/2019	Completion Date:	8/15/2019
CERCLIS ID:	MID006007306	RCRIS ID:	
ERNS No.:		State Notification:	EGLE
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

Final repairs were completed once the final monitoring & maintenance inspection was completed. All field activities required

by the UAO have been completed.

2.1.2 Response Actions During Reporting Period

- Continued operation & maintenance of surface water run-off and erosion control measures;
- Conducted final quarterly monitoring & maintenance survey with checklist and photo log completed;
- Conducted final treatment for invasive plants in all restored areas; and
- Completed repairs identified in the post-construction checklists in each BRSA.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

See PolRep #1

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Total</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Cardboard	solid	60 lbs	1660 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	70 lbs	975 lbs	NA	recycling	Otsego Recycling Center
Metals	solid	10,780 lbs	61,530 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	0 tons (est)	53,159 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	0 gal	2,013,046 gal	NA	on-site WWTP	On-site reuse/discharge to Kalamazoo River
Contact water	liquid	0 gal	69,039 gal	various	off-site WWTP	Liquid Industrial Waste, Holland, MI

Regional Metrics					
This is an Integrated River Assessment. The numbers should overlap.		Miles of river systems cleaned and/or restored		1.7	
		Cubic yards of contaminated sediments removed and/or capped		34,073	
		Gallons of oil/water recovered		0	
		Acres of soil/sediment cleaned up in floodplains and riverbanks		5.12	
Contaminant(s) of Concern			PCBs		
Administrative and Logistical Factors (Place X where applicable)					
	Precedent-Setting HQ Consultations (e.g., fracking, asbestos)		Community challenges or high involvement		Radiological
X	More than one PRP	X	Endangered Species Act / Essential Fish Habitat issues		Explosives
	AOC		Historic preservation issues	X	Residential impacts
X	UAO	X	NPL site		Relocation
X	DOJ involved		Remote location		Drinking water impacted
	Criminal Charges Have Been Filed*		Extreme weather or abnormal field season		Environmental justice
X	Tribal consultation or coordination or other issues		Congressional involvement		High media interest

	Statutory Exemption for \$2 Million		Statutory Exemption for 1 Year		Active fire present
	Hazmat Entry Conducted – Level A, B or C		Incident or Unified Command established		Actual air release (not threatened)
Green Metrics					
	Metric		Amount		Units
	Electricity from electric company		NA		kWh
	Consumers Energy #		NA		
	Electricity from sources other than the electric company		NA		kWh
	Solid waste reused		NA		
	Solid waste recycled		64,165		lbs
	Water Used		0		gallons

2.2 Planning Section

2.2.1 Anticipated Activities

MDNR personnel will continue to conduct site visits to check on all BRSAs. In addition, work crews may be conducting soil sampling in the floodplain areas of all BRSAs in support of planning for potential additional remedial activities.

A contractor to MDNR completed tree planting activity in several BRSAs in late 2019 and may be conducting monitoring and maintenance of the plantings. In addition, a contractor to MDNR will be removing submerged bridge pilings from the Kalamazoo River in BRSA 1 at the Pine Creek parking area in 2020. These activities are not being conducted under the time critical removal action.

2.2.1.1 Planned Response Activities

See Section 2.2.1

2.2.1.2 Administrative Activities / Next Steps

A final report summarizing the one year post-construction monitoring and maintenance period was received from Wood on November 15, 2019 and approved on February 10, 2020. All final reports related to the project are posted and available for download from the 'Documents' section of the project website (see Section 6.1).

2.2.2 Issues

None

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 field personnel. They do not include costs incurred by the PRPs or their contractors.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
START	\$1,315,000.00	\$1,280,103.00	\$34,897.00	2.65%
Intramural Costs				
US EPA - Direct	\$250,000.00	\$250,000.00	\$0.00	0.00%
US EPA - Indirect	\$200,000.00	\$200,000.00	\$0.00	0.00%
Total Site Costs				
	\$1,765,000.00	\$1,730,103.00	\$34,897.00	1.98%

* 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

2.5.2 Liaison Officer

The project team and crew sincerely appreciate all the assistance, understanding, patience and support of the local, regional, state and federal officials as well as the greater Otsego community and neighbors throughout the project.

2.5.3 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

See PolRep #1

4. Personnel On Site

Personnel from US EPA, MDNR, MDEGLE, Envirocon, Wood, Cardno and other subcontractors were present on-site sporadically during the reporting period.

5. Definition of Terms

BRSA	Bank Removal and Stabilization Area
MDEGLE	Michigan Department of Environment, Great Lakes and Energy
MDNR	Michigan Department of Natural Resources
OSC	On Scene Coordinator
PolRep	Pollution Report
PRP	Potentially Responsible Party
START	Superfund Technical Assessment & Response Team (US EPA contractor)
UAO	Unilateral Administrative Order
US EPA	United States Environmental Protection Agency

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

This is the final PolRep. No further reporting is anticipated. Once work commences on potential remedial action(s) in the floodplain, outreach by US EPA will continue.

7. Situational Reference Materials

No information available at this time.

POLREP #50 Last Updated 3/26/2020