

**E<sup>2</sup> Inc. Situation Assessment  
Grandville, MI: Organic Chemicals, Inc. (OCI) Superfund Site  
January 2008**

**Introduction**

EPA's primary responsibility at Superfund sites is to ensure the protection of human health and the environment. Consideration of a site's potential future use is an important part of this responsibility under the National Contingency Plan (NCP), because it is a part of two of the nine criteria for remedy selection. The first is the threshold criterion of overall protection of human health and the environment. EPA uses its evaluation of reasonably anticipated future land use to establish remedial goals and to select remedies that will allow for those uses whenever possible. Collaboration among EPA, communities, and site stakeholders in the evaluation of future uses establishes realistic expectations for how a site can be used after cleanup. This collaborative process can also help implement appropriate institutional controls, which are a necessary component of protectiveness at sites where waste is left in place.

Consideration of future land use also plays a central role in addressing the modifying community acceptance criterion of the NCP. It has been demonstrated at many Superfund sites that, when EPA works closely with communities and site stakeholders to determine a site's reasonably anticipated future land use, a high degree of community acceptance of the remedy is likely.

Finally, the proper consideration of future site uses can help enable communities to safely return sites to protective, sustainable, and productive uses, a national goal outlined in the Agency's 2006-2011 Strategic Plan. The Superfund Redevelopment Initiative (SRI) was created by EPA in 1999 to help communities and stakeholders in their efforts to return environmentally impaired sites to beneficial use. SRI provides a range of tools and information resources for EPA staff and stakeholders interested in Superfund site reuse.

**Situation Assessment Overview**

With funding from EPA Region 5, environmental consulting company E<sup>2</sup> Inc. conducted a situation assessment in the City of Grandville, Michigan in July 2007 to gather information to inform EPA's efforts to help ensure the long-term effectiveness and permanence of remedies implemented at the Organic Chemicals, Inc. Superfund site (OCI site).

The situation assessment was conducted following the information collection guidelines outlined in EPA's 2001 Reuse Assessment Guidance (OSWER 9355.7-06P).<sup>1</sup> Information gathered and reviewed included local stakeholders, site features and environmental considerations, site ownership, land use considerations and environmental regulations, community input, public initiatives, and likely future uses.

Activities conducted during the situation assessment included:

- Conference calls with EPA site staff and representatives from site owner 4-J Trucking Company;
- Information gathering and review of site owner planning materials and EPA site reports; and

---

<sup>1</sup> Reuse Assessments: A Tool to Implement the Superfund Land Use Directive (OSWER 9355.7-06P, 2001): [www.epa.gov/oerrpage/superfund/programs/recycle/pdf/reusefinal.pdf](http://www.epa.gov/oerrpage/superfund/programs/recycle/pdf/reusefinal.pdf)

- July 2007 site visit with EPA Region 5 Regional Reuse Coordinator Tom Bloom and site owner representatives.

This summary memo provides an overview of the key findings identified during the project's situation assessment as well as a set of potential next steps for incorporating long-term stewardship considerations as part of the reuse of the OCI site.

## **I. Findings**

### *A. Site Location and Overview*

- The City of Grandville (pop. 16,263) is located in Kent County, ten miles southwest of Grand Rapids in southwest lower Michigan. The approximately five-acre OCI site property is located at 3291 Chicago Drive in an industrial area of northeast Grandville.
- The OCI site is surrounded by several active industrial facilities – Tenneco Packaging, Inc. to the east, Htrans Holdings to the west, and Developers Inc. to the north. Residential areas are located approximately 200 feet southeast of the site and 1700 feet to the southwest. Interstate 196 is located less than one mile northwest of the site property (see Figure 1 on page 3).
- Petroleum refining, solvent reclamation, and chemical manufacturing activities at the OCI site between the 1930s and 1991 resulted in the contamination of site soils, surface water, and groundwater with volatile organic compounds, semi-volatile organic compounds, polychlorinated biphenyls, and inorganic compounds. EPA listed the site on the National Priorities List in September 1983.
- Contaminated lagoons were excavated and disposed of off-site in 1981 and between 1994 and 1997, EPA worked with two groups of PRPs to address the site's soil and groundwater contamination.<sup>2</sup> Remedial activities included the excavation and off-site disposal of site soils and the construction of a groundwater extraction and treatment system. This system operated until 1997, when it was shut down following groundwater monitoring compliance with an alternate point of compliance.
- The OCI site property is fenced. Substantial portions of the site's surface are covered by concrete slabs from former facility operations. One former facility building and the building that houses the site's inactive groundwater extraction and treatment system are located along the eastern edge of the site (see site photographs section on pages 6, 7, and 8 and Figure 2 on page 4).
- Grandville-based 4-J Trucking Company purchased the OCI site property in November 2006 via county tax sale, following implementation of the site's cleanup, which remediated the site to industrial use standards. In 2007, following a baseline environmental assessment and additional site sampling, cleanup, and building removal by the site owner, 4-J Trucking Company has returned the site to use as a truck storage and transportation facility.

---

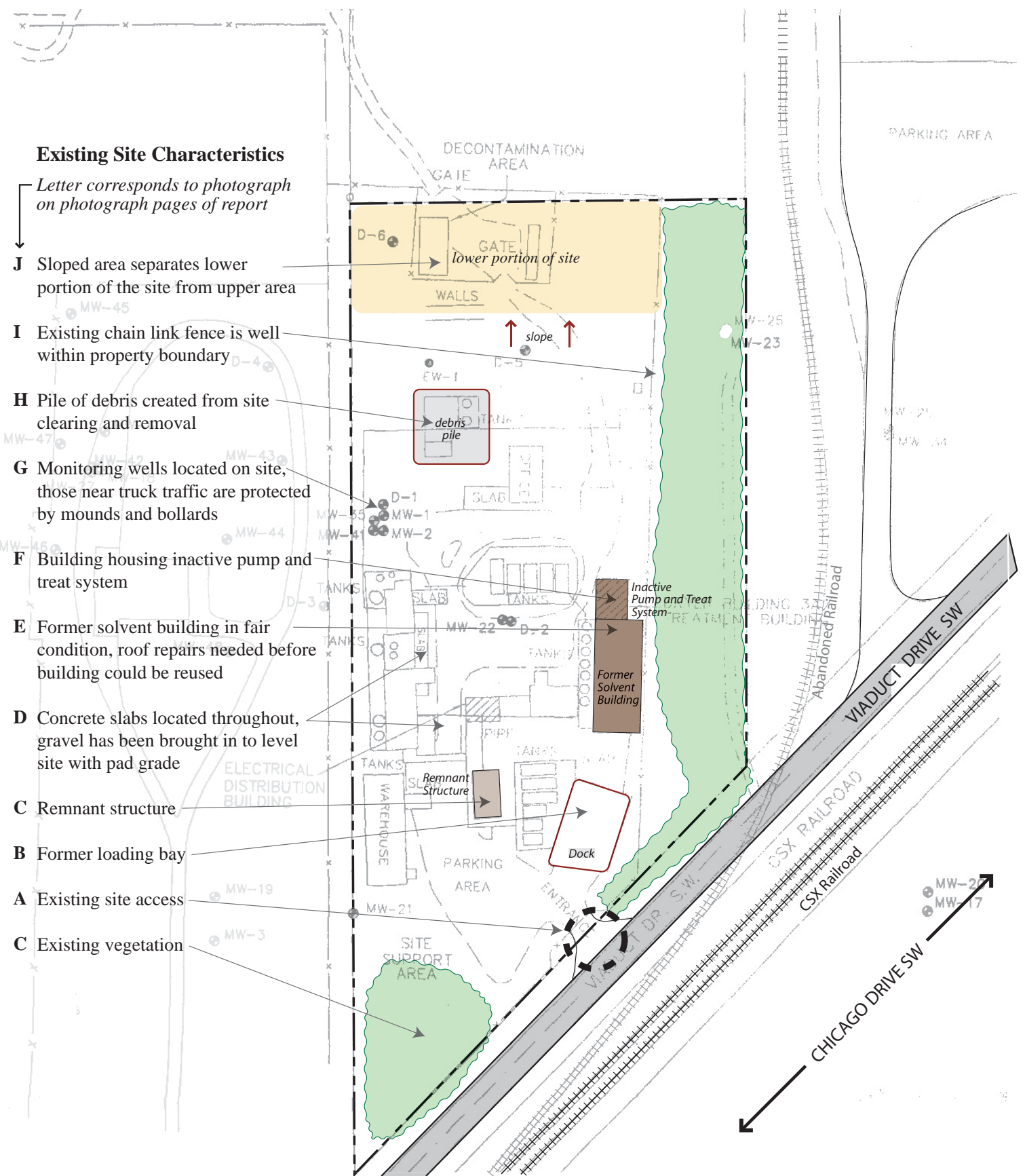
<sup>2</sup> Information summarized from the site's 1991 and 1997 Records of Decision, 1999 and 2004 Five-Year Review reports, 2000 Groundwater Consent Decree, and 2001 Soil Consent Decree.



Figure 1. Site Location Map

*B. Site Characteristics and Future Land Use Considerations*

- The approximate 5-acre OCI site is located in an industrial corridor and is accessed via Viaduct Drive SW, a service road for Chicago Drive SW. Site infrastructure includes access to all major utilities and a utility power pole is located near the center of the site. The site's topography is generally flat with the northern portion of the site sloping downward to a lower area of the site. A chain-link fence surrounds a majority of the property. The eastern edge of the property lies outside the fence and is covered in trees and tall grasses. Otherwise, the site is generally open with a few trees scattered in the southern portion of the site.
- Remnants of former site activities are located throughout the site and most of the central portion of the site is covered with concrete slabs. A recessed loading bay remains in front of the large former solvent building located on the eastern portion of the site. The groundwater extraction and treatment system is housed in the building adjacent the former solvent building. A large pile of debris from on-site demolition is located towards the rear of the property. Monitoring wells are located throughout the site.
- Existing site characteristics are shown on Figure 2 on the following page; letters on the map correspond to site photographs in *Section D. Site Photograph Overview*.



**Existing Site Characteristics**

Letter corresponds to photograph on photograph pages of report

- J** Sloped area separates lower portion of the site from upper area
- I** Existing chain link fence is well within property boundary
- H** Pile of debris created from site clearing and removal
- G** Monitoring wells located on site, those near truck traffic are protected by mounds and bollards
- F** Building housing inactive pump and treat system
- E** Former solvent building in fair condition, roof repairs needed before building could be reused
- D** Concrete slabs located throughout, gravel has been brought in to level site with pad grade
- C** Remnant structure
- B** Former loading bay
- A** Existing site access
- C** Existing vegetation

**OCI Superfund Site | Site Characteristics**

3291 Chicago Drive, Grandville Michigan

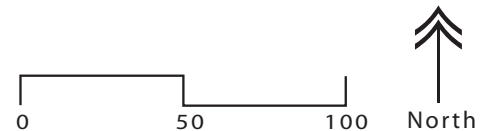


Figure 2. Site Characteristics

C. *Current Site Use Status and Site Owner Plans and Priorities*

- 4-J Trucking Company (the company) acquired the OCI site property in November 2006 for \$65,000 at a county tax sale and will pay an additional \$15,000 to pay off the delinquent 2006 summer taxes, plus \$20,000 for 2005 road improvements (special assessments). The site property's current assessed value is \$32,500. The company has paid property taxes on the site property since acquisition in 2006. Due to liability concerns, the owners of 4-J Trucking Company are in the process of transferring the company's ownership to a limited liability corporation, 2-J Trucking, LLC.
- The company has coordinated with Kent County's planning department and local elected officials to enable the site's reuse. The county has granted a temporary site plan approval and stipulated that the site must have a detailed site use and due care plan and asphalt paving must be in place by May 2008; the company has placed gravel on the site in the interim to support its trucking operations.
- The company's owners stated that the company undertook additional sampling and cleanup activities prior to moving forward with the site's reuse in 2007. The company listed its December 2006 Baseline Environmental Assessment and the removal of storage tanks and waste drums, wood and debris piles, on-site vegetation, miscellaneous containers, and the demolition and removal of several on-site buildings as examples of these activities. The company estimates that these activities have cost approximately \$50,000. The company also brought in gravel to raise the grade of portions of the site to the level of the concrete pads remaining on-site and prepare the site for asphalt paving.
- The company employs nine people and provides truck hauling services within a 100-mile radius of Grandville. The company typically hauls gravel, asphalt, and recyclables for public and private sector clients. The OCI site property provides a central storage and coordination location for the company's vehicles. The company's owners stated that they are hopeful that the company's reuse of the site will benefit the City of Grandville and the community, providing new jobs and increased tax revenues.
- The company's shorter-term (6-12 months) site plans include additional gravelling of the site's northern areas, stabilizing the site's remaining building, conducting an engineering study for stormwater management, submitting a site plan to Kent County's planning department, installing stormwater infrastructure, and paving the central and southern portions of the site with asphalt. The company estimates that the paving of each acre of the site will cost approximately \$100,000 (see Figure 3 on page 9).
- The company's longer-term (12+ months) site plans include access enhancements to the site's southern edge and the construction of an additional, 2,000 sq. foot site building to provide office space and store vehicles and equipment. This building would likely be located adjacent to the existing structure located on the eastern edge of the site. The company also plans to relocate and align the site's eastern fence with the site property boundary and backfill the site's former loading docking areas, which would enable additional paving and the extension of a loop road at the site for improved circulation. Finally, the company may also provide access or transfer ownership of the northern, undeveloped part of the site to an adjacent property owner (see Figure 3 on page 9). EPA site staff indicated that a transfer of ownership for either the parcel or a portion of the parcel would need to be consistent with institutional controls implemented at the site.

- The company's owners indicated that they have had minimal contact with EPA or state agency staff and are in occasional contact with the site's two PRP groups. The company's owners stated that they were not expecting the significant scale of site preparation activities required to reuse the site following its remediation. The owners indicated that while the site's PRP groups are currently responsible for the operations and maintenance of the site's remedy, they may be interested in transferring some of these responsibilities. The company's owners indicated that they would need additional information before determining whether they would be able or willing to take on these responsibilities. EPA site staff indicated that the PRP groups would need to continue to meet their obligations and could work with the site owner to make sure they are met.
- The company's owners requested ongoing guidance from EPA in ensuring their compliance with the reasonable steps criteria outlined in EPA's November 2006 correspondence. The site's Record of Decision included institutional controls as part of the selected remedy. To date, institutional controls have not been fully implemented at the site.

#### *D. Site Photograph Overview*

- The photographs below capture existing site conditions; the letter with each photograph corresponds to the letters on Figure 2, page 4 and Figure 3, page 9.



*A. Entrance to the site*



*B. Former loading dock and solvent building*



*C. Site vegetation and structures in background*



*D. Former concrete slabs located throughout site*



*E. Former treatment building*



*F. Striped building houses treatment system*



*G. Monitoring wells protected by earth berms*



*H. Pile of concrete debris*



*I. View towards eastern edge of property*



*J. Lower level, northern portion of site*



*K. Possible expansion of truck parking area*



*L. Eastern edge of property, outside of fence*



*M. Possible location for building expansion*



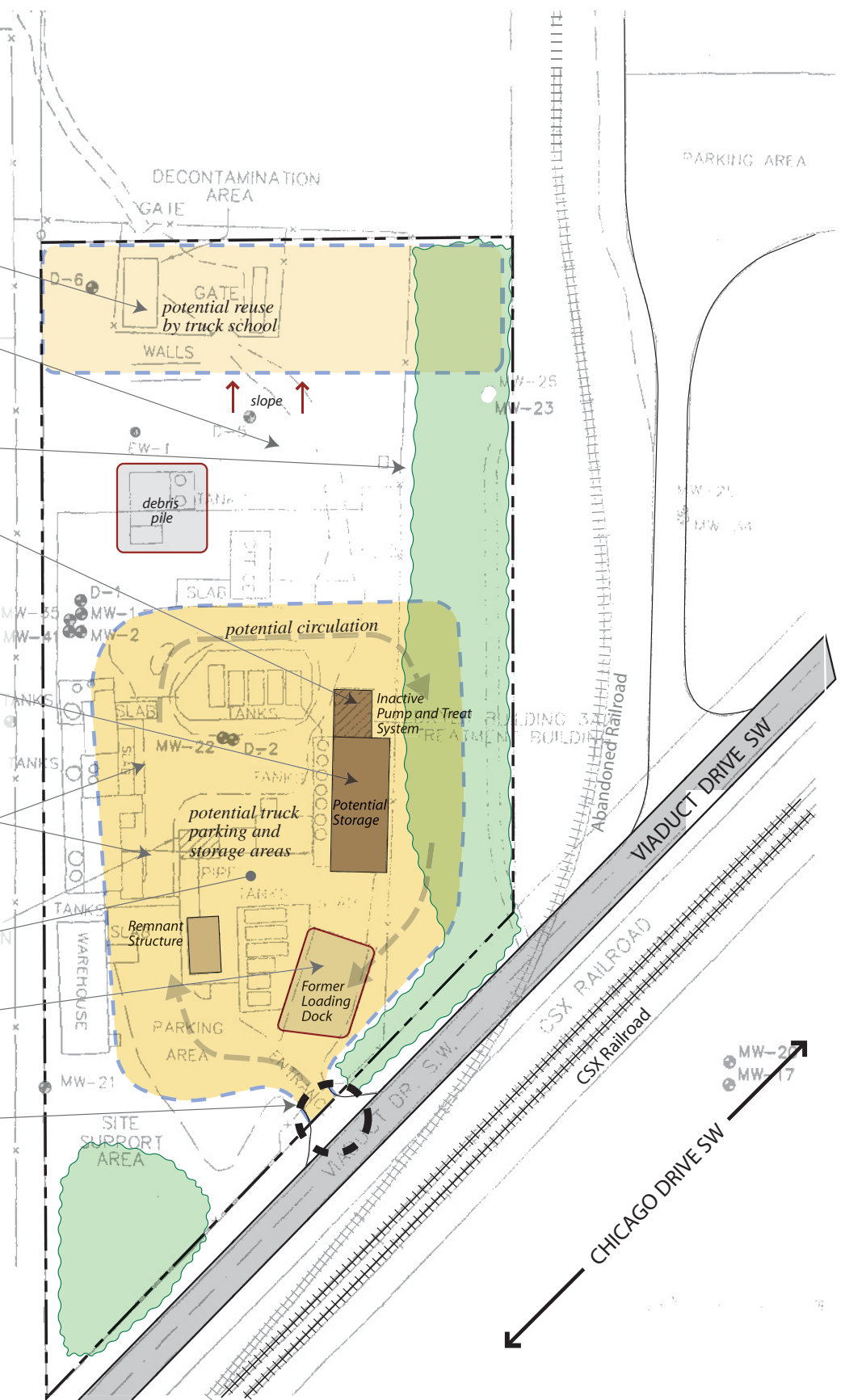
*N. Truck parking area, future plans include paving*



**Potential Reuse Considerations**

Letter corresponds to photograph on photograph pages of report

- J** Possible transfer of site area to neighboring truck school
- K** Possible expansion of asphalt paving, gravel needed to bring area up to grade
- L** Potential fence relocation to maximize use of property
- F** Water treatment building must be retained in case treatment facility needed in the future, building may be able to be reused after treatment system is no longer needed
- M** Once repaired, building may be reused for storage; possible expansion may include an additional building to the west
- D** Gravel has been brought in to level site grade with concrete pads and to prepare area for asphalt paving
- N** Possible paved truck parking area, loop drive for easier ingress/egress
- B** Former loading bay will need to be filled in to accommodate proposed vehicular circulation
- A** Possible site access improvements may include widening and repaving



**OCI Superfund Site | Potential Future Use Considerations**

3291 Chicago Drive, Grandville Michigan

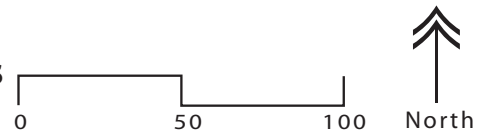


Figure 3. Potential Future Use Considerations

#### E. Findings: Key Future Land Use Considerations

- The Organic Chemicals, Inc. Superfund site has been returned to use by a site owner willing to invest time and resources in preparing the site to serve as a truck storage and transportation facility, which is an industrial land use consistent with the site's remedy. The company's future site plans provide for an extension of the existing facility. If the site's ownership was transferred, the site's existing and planned infrastructure, similar surrounding land uses, and industrial zoning all suggest that similar operations would be located at the site in the future.
- Based on the situation assessment's information gathering, stakeholder interviews, and site visit, there appear to be no Superfund-related obstacles standing in the way of the OCI site property's continued reuse. In addition to site documents in EPA's Administrative Record, EPA's reasonable steps letter and the site owner's baseline environmental assessment also provide guidance for both current site activities and future uses or facility expansions planned for the site. However, EPA will likely need to coordinate with the site's owners and two PRP groups regarding the site remedy's ongoing operation and maintenance as well as implementation of the site's institutional controls.

## Appendix A

### City of Grandville OCI Site Parcel Summary

The screenshot shows the accessKent website interface. The main content area displays the following information:

**Parcel Summary**

Assessed values and taxable values displayed on accessKent are compiled from local city and township assessors and are current as of March, 2007. Changes after this date should be verified with local assessors. Additional property information may also be available from local assessors. [Click here](#) for a list of local government web sites. Some property addresses on accessKent may be preliminary or estimated; if you believe your address is incorrect, please notify Kent County Bureau of Equalization at the following e-mail: [Jeff.Henrickson@kentcounty.org](mailto:Jeff.Henrickson@kentcounty.org)

**Parcel Identification:**

- Parcel Number: 41-17-08-426-003
- Government Unit Number & Name: 58 CITY OF GRANDVILLE
- Parcel Status: Active
- Property Address: 3291 CHICAGO DR SW
- Property Classification: 301 INDUSTRIAL - IMPROVED
- School District Number & Name: 41130 - GRANDVILLE PUBLIC
- Zoning:
- Acreage & Lot Dimensions: 0:

**Owner Identification:**

- Owner Name One: 4-J TRUCKING INC
- Owner Name Two:
- Mailing Address: 3705 MONARCH DR NE
- Mailing City, State, Zip Code: GRAND RAPIDS MI 49525

**Assessment**

| Year: | State Equalized Value: | Taxable Value: |
|-------|------------------------|----------------|
| 2007  | \$32,500               | \$32,500       |
| 2006  | \$248,800              | \$197,561      |
| 2005  | \$241,500              | \$191,250      |

Navigation buttons at the bottom include: Delinquent Tax Status, Sales History, Tax Description, Split History, Get Map, New Search, Return to Search Results, Refine Search, and LOGOUT.

Source: [www.accesskent.com](http://www.accesskent.com)

#### *State equalized value and taxable value*

In the 1990s to address rising property taxes, Michigan created a second, local valuation measure (taxable value) that is limited in how much it can increase each year. When a property changes hands, however, the two values are realigned, with the taxable value reset to match the state equalized value.

“The state equalized value and taxable value of land in Michigan are measures used by state agencies and local governments, respectively, to assess personal and real property. The taxable value of a parcel may differ from the state equalized value as a result of limits on increases placed in the Michigan Constitution by Proposal A of 1994. Taxable value may not rise by more than the lesser of the increase in the consumer price index or five percent. When ownership of a parcel is transferred, the parcel’s taxable value and the parcel’s state equalized value are realigned.”