



March 26, 2020

Mr. Brian Kelly  
On-Scene Coordinator  
U.S. Environmental Protection Agency  
Region 5, Superfund and Emergency Management Division  
2565 Plymouth Road  
Ann Arbor, Michigan 48105

**Subject: C&H Mineral Building ACBM Removal Letter Report (Revision 1)**  
**C&H Mineral Building - RS Site**  
**EPA Contract No.: 68-HE-0519-D0005**  
**Task Order Line Item No.: F0069-0002AI028**  
**Document Tracking No.: 0239A**

Dear Mr. Kelly:

Under the Superfund Technical Assessment and Response Team (START) Contract No. 68-HE-0519-D0005, the U.S. Environmental Protection Agency (EPA) Region 5 tasked Tetra Tech, Inc. (Tetra Tech) to prepare a letter report that provides an overview of asbestos containing building material (ACBM) abatement activities completed by Silver Shore Enterprise, Inc. (Silver Shore) at the Calumet & Hecla (C&H) Mineral Building – RS site located in Hubbell, Houghton County, Michigan. Project activities included documentation of Silver Shore’s abatement activities, including the removal of the C&H Mineral Building’s roofing materials and pickup of roofing materials from the ground surface completed during June through September 2018, regular visual inspections and pickup of material from June through September 2019, and Michigan Department of Transportation (MDOT) M-26 right of way (ROW) ACBM removal activities on October 31, 2019.

The following sections discuss the site location, history, and Silver Shore’s abatement activities. **Attachment A** provides figures for this letter report. **Attachment B** provides photographic documentation of EPA START activities. **Attachment C** includes available disposal documentation for the abated ACBM. **Attachment D** provides photographic documentation of the C&H Mineral Building roofing removal activities.

## **SITE LOCATION AND HISTORY**

The site, a vacant industrial property, from the mining era, owned by Silver Shore, is located at 52986 Highway M-26 in Houghton County, Hubbell, Michigan (**Figure 1**). Two structures are present at the site. Construction of the approximately 290 by 80 foot, nearly four-story C&H Mineral Building was completed in 1929. This building had a reinforced concrete foundation and compartment walls for mineral storage,

including 10 main compartments for storage of 15,000 tons of material, as well as a 7.5 ton overhead electric crane with a clam shell bucket for handling the mineral (MTU 2014). The second structure whose prior use is unknown, is an approximately 30 by 40 foot, single-story building of sandstone construction.

The surface of the 9.28-acre site property is mainly barren (except for an approximately 170-foot-wide vegetated strip along Torch Lake). Approximately 2.9 acres of the site was previously covered with 18 waste piles that appeared to be mining era waste and debris, 17 waste piles of construction and demolition, roadwork, and woody debris, and mining era stack debris. Under a separate potentially responsible party (PRP) lead removal the waste piles were either removed from the site or managed on-site during 2019 by Honeywell under a cooperative agreement with the EPA Great Lakes National Program Office. The PRP removal action is scheduled to be completed during the 2020 construction season. A chain link fence has been established along the property boundaries.

The site is bordered to the northeast by a contiguous and vacant mining era industrial property (coal dock) and to the southwest by Koppers' Hubbell Plant, a contiguous mining era industrial property (smelter) currently used as a performance chemical manufacturing facility. To the northwest is the MDOT Highway M-26 ROW that includes a wide paved shoulder used heavily by local residents for recreational activities, with single-family residences beyond. To the southeast is Torch Lake (**Figure 2**).

The site property, a portion of which is part of the Torch Lake Superfund Site, was previously (until circa late 1960s) a part of the C&H Mining Company beneficiation and reclamation industrial complex. This complex includes the C&H Mineral Building and a portion of the ruins of the C&H smelter facility. Located adjacent to the northeast and southwest of the site were the related C&H coal dock and smelter, respectively. Further to the northeast in the Village of Lake Linden, the C&H industrial complex included regrinding, leaching, flotation plant, stamping, and power generation operations. The C&H Mineral Building received the processed copper ore from the C&H stamp mills. The copper ore was sorted and stored in the C&H Mineral Building prior to transfer to the C&H smelter for additional processing. The site layout and proximal historic C&H mining era buildings and structures are depicted on **Figure 2**.

Beyond capping a strip of the site property surface bordering Torch Lake, no EPA remedial actions have been implemented at the site. As-built drawings for the Tamarack City Torch Lake EPA Superfund Site indicate that the vegetated cap along Torch Lake located on the site property (and the adjacent former smelter property) were placed as part of the Torch Lake Superfund Site Hubbell/Tamarack remedial action (USDA NRCS 2001). The Torch Lake Superfund Site Five-Year Review Report indicated that construction was completed in 2000 and that the Hubbell/Tamarack City parcel was deleted from the National Priorities List in 2004 (EPA 2013). The capped areas are subject to an on-going Michigan Department of Environment, Great Lakes, and Energy (EGLE) operation and maintenance plan. The balance of the site property and former smelter property and adjacent coal dock were not addressed as part of the Torch Lake Superfund Site remedial action.

EGLE Remediation and Redevelopment Division (EGLE RRD) undertook site investigation (SI) activities from 2014 through 2017 that identified ACBM, specifically roofing material that had fallen or was blown off the roof of the C&H Mineral Building, was present on the ground surface, including outside of the fenced site property in the MDOT ROW.

Based on the SI results, EGLE RRD conducted Interim Response (IR) ACBM recovery efforts during June and July 2016 that included the removal and disposal of 11.81 tons of actual or suspected visible ACBM from the site property and bordering properties, including the MDOT ROW. During September and October 2016, EGLE RRD conducted a second ACBM recovery event that included removal and disposal of an additional 1.77 tons of actual or suspected visible ACBM from the site property. The IR construction summary reports listed in the **References** section document the two ACBM recovery events conducted by EGLE RRD (MSG 2017a and MSG 2017b).

During July 2017, the EGLE Air Quality Division (EGLE AQD) asbestos inspector evaluated conditions in the MDOT ROW bordering the site property. The EGLE AQD asbestos inspector noted the presence of roofing material (later confirmed by the laboratory to be ACBM) and sampled the material at 10 locations on both sides of M-26 within a 1,000-foot (ft) section of the MDOT ROW. Sample results confirmed that ACBM had continued to have fallen and blown off the roof of the C&H Mineral Building into the MDOT ROW.

Based on the EGLE RRD SI and IR findings, and EGLE AQD evaluation in a November 9, 2017 letter, EGLE requested assistance from the EPA Emergency Response Branch (ERB) to address the risks posed by the site. On December 7, 2017, START conducted sampling that confirmed prior ACBM analytical results. Through multiple lines of evidence, EGLE and EPA documented that actual or suspect ACBM roofing materials had been and were continuing to fall and blow off the C&H Mineral Building roof onto the site property, bordering properties, and the adjacent MDOT Highway M-26 ROW (Tetra Tech 2018a and 2018b).

At the request of the EPA, the Michigan Department of Health and Human Services (MDHHS) conducted a public health evaluation of the asbestos in the area surrounding the site and concluded that physical hazards existed and that there was a human exposure route to asbestos fibers from the roofing material both on and off the site property (MDHHS 2018). In April 2018, the Western Upper Peninsula Health Department (WUPHD) issued a public warning to avoid activities along a 1000-ft stretch of the MDOT ROW near the C&H Mineral Building (WUPHD 2018).

Representatives of EGLE, EPA, MDHHS, WUPHD, Houghton County, and Torch Lake Township officials collaborated to find a solution to the risks posed by the C&H Mineral Building roofing material.

Ultimately, the EPA issued Silver Shore a General Notice of Potential Liability dated April 24, 2018 and EGLE issued a Request for Section 20107a of Part 201 Compliance Documentation dated April 23, 2018.

## **SILVER SHORE ABATEMENT ACTIVITIES**

In response to the EPA and EGLE directives, Silver Shore undertook abatement activities between June and September 2018 that included the removal of 11.41 tons of ACBM from the roof of the C&H Mineral Building and the ground surface near the building, including outside of the fenced site property in the MDOT ROW (Wood Environment & Infrastructure Solutions, Inc. [Wood 2019a]).

During a site visit on October 2, 2018, following a series of site inspections and supplemental ACBM pickup activities by Silver Shore the EGLE AQD asbestos inspector concluded that no suspect material that would be of concern remained in the MDOT ROW on either side of the highway within the previously identified 1,000-ft section of M-26 as depicted on **Figure 3**. The EGLE AQD site visit and conclusion were documented in an October 2, 2018 electronic mail from the EGLE AQD Asbestos Inspector to the EPA On-Scene Coordinator and EGLE RRD Upper Peninsula District Supervisor. The EGLE AQD asbestos inspector also recommended regular visual inspection of the ROW to maintain the cleanliness of the ROW. The EGLE AQD asbestos inspector also confirmed with Silver Shore's abatement contractor, Upper Peninsula Abatement Company Inc. (UP Abatement) of Negaunee, Michigan, that all of the ACBM from the roof of the C&H Mineral Building had been removed. The roofing removal was documented in an October 15, 2018 electronic mail from the EGLE AQD asbestos inspector to the EPA On-Scene Coordinator and in Wood's Technical Memorandum (Wood 2019a).

A visual inspection of the MDOT ROW by EPA START on April 25, 2019 indicated the sporadic presence of ACBM roofing materials within the ROW on both sides of Highway M-26. Subsequently, as requested by EPA, Silver Shore and EPA START conducted visual inspections of the MDOT ROW approximately every two weeks from June 10, 2019 until September 26, 2019. During these visual inspections ACBM observed on the ground surface and partially buried in the soil within the MDOT ROW on both sides of Highway M-26 was manually removed by Silver Shore. Manifests were not provided by Silver Shore for disposal of the ACBM removed during these inspections. Photographs from the MDOT ROW inspections are included in **Attachment B**.

Given the periodic observations of additional ACBM in the ROW, on October, 31 2019, Silver Shore and Honeywell completed a removal of surficial soils mixed with ACBM roofing materials along the MDOT ROW on the southeast side of Highway M-26 extending approximately 200 feet on either side of the C&H Mineral Building in accordance with the ROW Soil Removal Work Plan (Wood 2019b). The area of soil removal and photographs of the removal and restoration are depicted on **Figure 3**, and additional photographs are included in **Attachment B**. According to the Final Construction Report, the top 2-3 inches



of soil was removed and the area visually inspected to ensure all surficial ACBM was removed prior to backfilling with topsoil and applying grass seed, fertilizer, and mulch. A total of 104.11 tons of soil mixed with ACBM was removed and disposed (Wood 2020). **Attachment C** provides roof and ROW removal ACBM disposal documentation. **Attachment D** provides a series of September 2018 EGLE RRD aerial photographs of the C&H Mineral Building roof indicating removal of the roofing materials.

If you have any questions on this report or require additional information, please contact me at 906-281-3404.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey S. Binkley'.

Jeffrey S. Binkley  
The Mannik & Smith Group, Inc. (Subcontractor of Tetra Tech) Project Manager

Attachments:

- Attachment A – Figures
- Attachment B – EPA START Photographic Documentation
- Attachment C – Manifests
- Attachment D – EGLE RRD Photographic Documentation

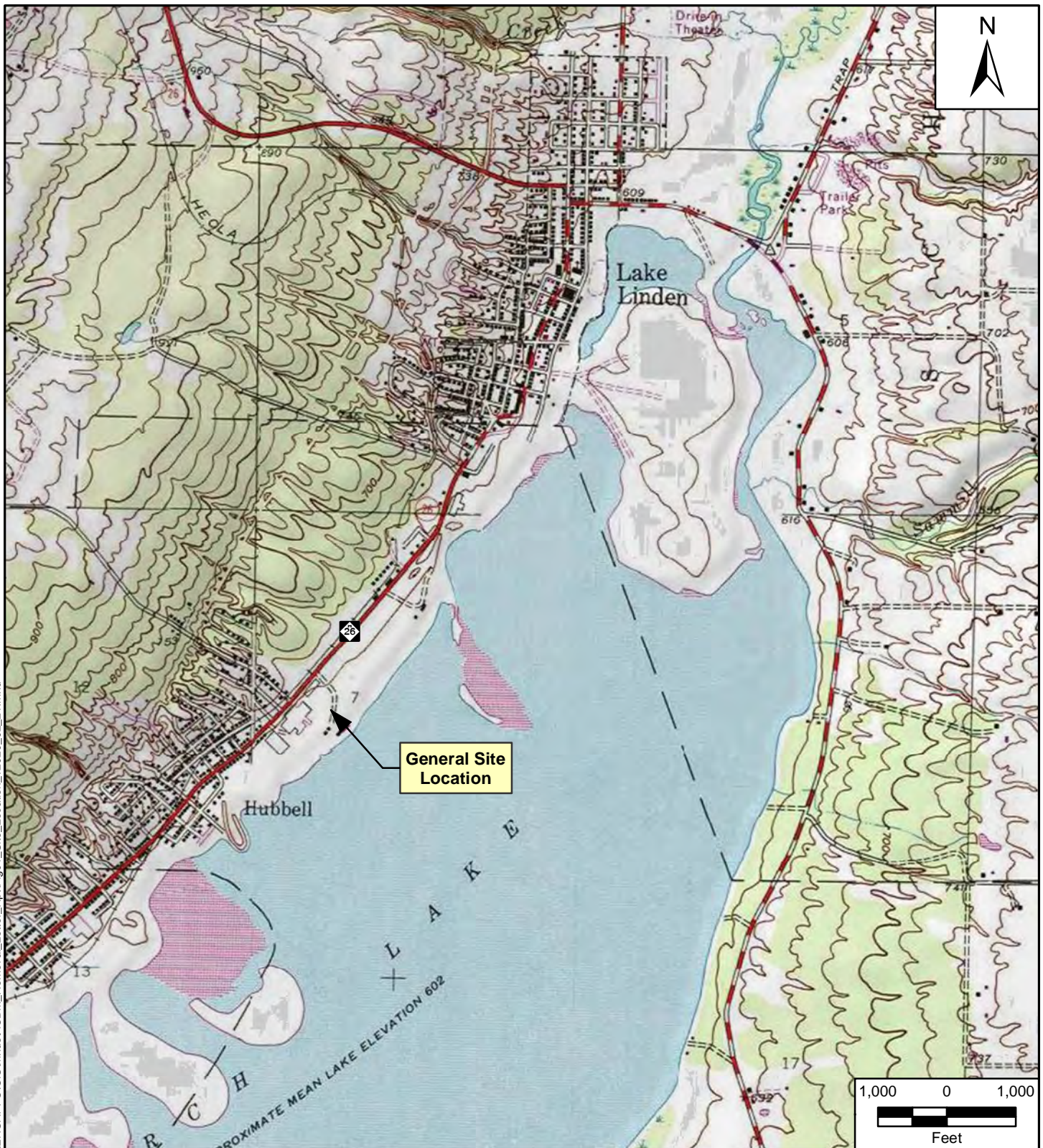
## REFERENCES

- U.S. Department of Agriculture Natural Resources Conservation Service (USDA NRCS). Detailed Remedial Plans for Tamarack City Torch Lake EPA Superfund Site As-Built Drawings. May 2001.
- U.S. Environmental Protection Agency (EPA). Five-Year Review Report for Torch Lake Superfund Site Houghton County, Michigan. March 2013.
- Michigan Technological University (MTU). PHASE 1: From North end of Torch Lake to Hubbell Beach C&H Lake Linden Operations Area of the Abandoned Mining Wastes – Torch lake non-Superfund Project, TASK 3: Historical Archive Research & Mapping. July 2014.
- The Mannik Smith Group (MSG). 2017a. Interim Response Construction Summary Report for Asbestos Containing Building Materials Abatement, Abandoned Mining Wastes – Torch Lake Non-Superfund Site, CHLL Hubbell Processing Area, Houghton County, Michigan, Site ID#31000098. April.
- MSG. 2017b. Interim Response Construction Summary Report for Asbestos Containing Building Material and Residual Process Material Removal, Abandoned Mining Wastes – Torch Lake Non-Superfund Site, CHLL Hubbell Processing Area, Houghton County, Michigan, Site ID#31000098. April.
- Tetra Tech, Inc. (Tetra Tech). 2018a. C&H Mineral Building Roof Overview Letter Report Revision 3. January.
- Tetra Tech. 2018b. Removal Assessment Report – for C&H Mineral Building – RS Site. January.
- The Michigan Department of Health and Human Services (MDHHS). 2018. Public Health Evaluation of the Asbestos in the area Surrounding the C&H Mineral Building Located at 52986 Highway M-26, Hubbell, Houghton County, Michigan. 2018.
- Western Upper Peninsula Health Department (WUPHD). 2018. “C&H Mineral Building: Potential Asbestos Exposure.” April. Online Address: <https://www.wuphd.org/ch-mineral-building-potential-asbestos-exposure/>
- Wood Environment & Infrastructure Solutions, Inc. (Wood). 2019a. Technical Memorandum, Mineral Building Property. May.
- Wood. 2019b. Right-of-Way Soil Removal Work Plan, Mineral Building Property. October.
- Wood. 2020. Final Construction Report, Mineral Building – Highway M-26 Right of Way, Torch Lake Township, Michigan. March.

**ATTACHMENT A**  
**Figures**



File Path: W:\Projects\Projects P-TT\13082A\ENGAPPS\GIS\mxds\ACBM\_Removal\_Letter\_Rpt\Fig01\_Site\_Location\_v2020\_02\_21.mxd



Base Map Source: ESRI USA Topo Maps map service

EPA Contract No.: 68-HE-0519-D0005  
TOLIN: F0069-0002A1028

C&H Mineral Building - RS Site  
Hubbell, Michigan

**Figure 1**  
**Site Location**



Prepared For: USEPA

Prepared By: KRB - MSG



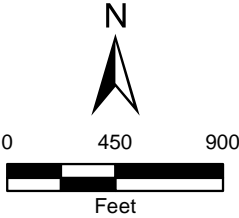


**Legend**

 Mining Era Buildings and Structures

Source of Aerial Photograph: Michigan Imagery Solution (Houghton - 2013 - 1ft - 4-band)

EPA Contract No.: 68-HE-0519-D0005  
TOLIN: F0069-0002AI028

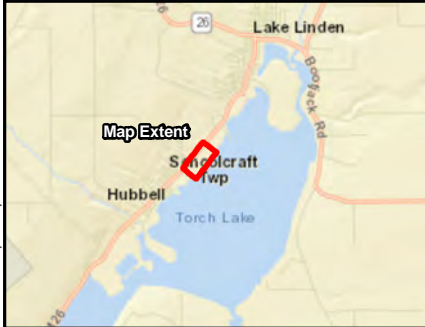


C&H Mineral Building - RS Site  
Hubbell, Michigan

**Figure 2**  
*Site Layout*



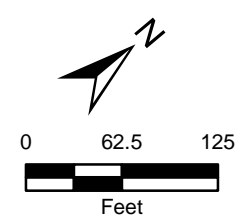




- ROW Soil Removal Area
- Asbestos Containing Building Materials Removed from the Roof of the Mineral Building
- Removed Waste / Stack Debris Pile
- Fence
- Property Boundary

Source of Aerial Photograph: ESRI World Imagery Service - DigitalGlobe 6/20/2016  
Source of ROW Restoration Photos: Wood Environment & Infrastructure Solutions, Inc.

EPA Contract No.: 68-HE-0519-D0005  
TOLIN: F0069-0002AI028



C&H Mineral Building - RS Site  
Hubbell, Michigan

**Figure 3**  
**Asbestos Abated Area Map**

**TETRA TECH**

Prepared For: USEPA  
Prepared By: KRB - MSG  
Coordinate System: NAD\_1983\_Michigan\_GeoRef\_Meters





**ATTACHMENT B**  
**EPA START Photographic Documentation**



## Photographic Documentation

**Client:** EPA

**Site Name:** C&H Mineral Building

**Location:** Hubbell, Michigan

**Prepared by:** Danielle Pilarski

**TO-TOLIN Number:** F0069-0002AI028

**Dates:** 4/25, 6/24, 8/14, 9/26, and 10/31/2019

### Photograph No. 1

**Date:** 4/25/2019

**Description:** View looking south of suspect asbestos containing building material (ACBM) roofing material within the Michigan Department of Transportation right-of-way (MDOT ROW) on the southeast side of Highway M-26



### Photograph No. 2

**Date:** 4/25/2019

**Description:** View looking south of suspect ACBM roofing material within the MDOT ROW on the southeast side Highway M-26.







## Photographic Documentation

**Client:** EPA

**Site Name:** C&H Mineral Building

**Location:** Hubbell, Michigan

**Prepared by:** Danielle Pilarski

**TO-TOLIN Number:** F0069-0002AI028

**Dates:** 4/25, 6/24, 8/14, 9/26, and 10/31/2019

### Photograph No. 3

**Date:** 4/25/2019

**Description:** View looking south of suspect ACBM roofing material within the MDOT ROW on the northwest side of Highway M-26.



### Photograph No. 4

**Date:** 4/25/2019

**Description:** Close up view of suspect ACBM roofing material found within the MDOT ROW.







## Photographic Documentation

**Client:** EPA

**Site Name:** C&H Mineral Building

**Location:** Hubbell, Michigan

**Prepared by:** Danielle Pilarski

**TO-TOLIN Number:** F0069-0002AI028

**Dates:** 4/25, 6/24, 8/14, 9/26, and 10/31/2019

### Photograph No. 5

**Date:** 6/24/2019

**Description:** View of a piece of suspect ACBM roofing material found within the MDOT ROW on the southeast side of Highway M-26 during visual inspections.



### Photograph No. 6

**Date:** 8/14/2019

**Description:** View of a partially buried piece of suspect ACBM roofing material found within the MDOT ROW on the southeast side of Highway M-26 during visual inspections.







## Photographic Documentation

**Client:** EPA

**Site Name:** C&H Mineral Building

**Location:** Hubbell, Michigan

**Prepared by:** Danielle Pilarski

**TO-TOLIN Number:** F0069-0002AI028

**Dates:** 4/25, 6/24, 8/14, 9/26, and 10/31/2019

### Photograph No. 7

**Date:** 9/26/2019

**Description:** View of a piece of suspect ACBM roofing material found in the drainage ditch within the MDOT ROW on the northwest side of Highway M-26 during visual inspections.



### Photograph No. 8

**Date:** 10/31/2019

**Description:** View looking southwest of surficial soil scraping along the MDOT ROW.





## Photographic Documentation

**Client:** EPA

**Site Name:** C&H Mineral Building

**Location:** Hubbell, Michigan

**Prepared by:** Danielle Pilarski

**TO-TOLIN Number:** F0069-0002AI028

**Dates:** 4/25, 6/24, 8/14, 9/26, and 10/31/2019

### Photograph No. 9

**Date:** 10/31/2019

**Description:** View looking southwest at the installation of mulch blankets over the seeded and fertilized topsoil placed in the MDOT ROW. Photo taken by Wood Environment & Infrastructure Solutions, Inc.



### Photograph No. 10

**Date:** 10/31/2019

**Description:** View looking northeast at the completed site restoration in the MDOT ROW. Photo taken by Wood Environment & Infrastructure Solutions, Inc.





**ATTACHMENT C**  
**Manifests**

# WASTE SHIPMENT RECORD/ASBESTOS MANIFEST

(See Reverse for Instructions)

For Disposal Site Use Only

Elevation \_\_\_\_\_

North \_\_\_\_\_ East \_\_\_\_\_

1-A. Special Waste Profile Number <b>122 844-Mi</b>		NESHAP Notified <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		WSR Number <b>211135</b>	
1-B. Generator Name, Contact Name, and Complete Mailing Address (including Zip Code) <b>5. New Shore Enterprise 45505 Champion Street, PO Box 460 South Range, MI</b>					1-C. Generator's Phone Number <b>Bill Siler</b>
1-D. Work Site Address <b>Mineral Building 52986 M-26; Hubbell, MI 49934</b>					1-E. 24 Hour Emergency Response Telephone Number
2. Operator's Name and Complete Mailing Address <b>Upper Peninsula Abatement Company 349 W. S. Highway 41E; Negaunee, MI 49866</b>					Operator's Phone Number <b>906.250.6710</b>
3. Waste Disposal Site (WDS) Name and Complete Mailing Address <b>K&amp;W Landfill 11877 State Hwy M38; Ontonagon, MI 49955</b>					WDS Phone Number <b>906.883.3504</b>
4. Name and Address of Responsible Agency					
5. Description of Materials					
<input checked="" type="checkbox"/> friable asbestos <b>Roofing</b>		RQ, NA2212, Asbestos, 9, PGIII		6. Containers No. <b>30</b> Type <b>C-70</b>	7. Total Quantity yd3 <b>9.38 tons</b>
non-friable asbestos		Cat I _____ Cat II _____			
8. Special Handling Instructions and Additional Information 24 HOUR NOTICE GIVEN PRIOR TO DISPOSAL, MUST BE BURIED					
9. GENERATOR/OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations. I hereby certify that the asbestos is not contaminated with hazardous, PCB, and/or any special waste.					
Printed/Typed Name and Title <b>William Siler President</b>		Signature <i>William Siler</i>		Date <b>8-24-18</b>	
10. Transporter 1 Company Name <b>Bill Siler Contracting Inc</b>		Driver Signature <i>R. Bleise Jr</i>			
Complete Mailing Address <b>P.O. Box 460 South Range MI 49963</b>		Printed Name and Title <b>Richard Bleise Jr.</b>			
Telephone Number (including area code) <b>906-442-4518</b>		Date <b>8-24-18</b>			
11. Transporter 2 Company Name		Driver Signature			
Complete Mailing Address		Printed Name and Title			
Telephone Number (including area code)		Date			
12. Discrepancy Indication Space					
13. Waste Disposal Site Owner or Operator Special Waste Approval is issued by signature in the case of a Generic Asbestos Approval. Certification of receipt of asbestos materials covered by this manifest except as noted in Item 12.					
Printed/Typed Name and Title <b>Linda Thoreson Specialist</b>		Signature <i>Linda Thoreson</i>		Date <b>8-24-18</b>	



# WASTE SHIPMENT RECORD/ASBESTOS MANIFEST

(See Reverse for Instructions)

For Disposal Site Use Only

Generator	1-A. Special Waste Profile Number <b>122844 Mi</b>		NESHAP Notified <b>X</b> YES <input type="checkbox"/> NO <input type="checkbox"/>		WSR Number <b>230317</b>		Elevation _____ North _____ East _____	
	1-B. Generator Name, Contact Name, and Complete Mailing Address (including Zip Code) <b>Silver Shore Enterprise S 45505 champion street PO Box 400 South Range Mi 49963</b>						1-C. Generator's Phone Number <b>906-482-8517</b>	
	1-D. Work Site Address <b>Mineral Building 52986 M 26 Habbell, Mi 49934</b>						1-E. 24 Hour Emergency Response Telephone Number <b>906-482-8517</b>	
	2. Operator's Name and Complete Mailing Address <b>Upper Peninsula Abatement Company 349 45 Highway 41E Negaunee Mi 49866</b>						Operator's Phone Number <b>906-250-6710</b>	
	3. Waste Disposal Site (WDS) Name and Complete Mailing Address <b>K &amp; W Landfill 49965 11877 state Hwy M 38 Ontonagon Mi</b>						WDS Phone Number <b>906-883-3509</b>	
Transporter	4. Name and Address of Responsible Agency							
	5. Description of Materials				6. Containers No. Type		7. Total Quantity yd3	
	friable asbestos <b>Roofing</b>				RQ, NA2212, Asbestos, 9, PGIII		<b>10 CYO 2.03 tons</b>	
	non-friable asbestos				Cat I _____ Cat II _____			
	8. Special Handling Instructions and Additional Information 24 HOUR NOTICE GIVEN PRIOR TO DISPOSAL, MUST BE BURIED							
Disposal Site	9. GENERATOR/OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations. I hereby certify that the asbestos is not contaminated with hazardous, PCB, and/or any special waste.							
	Printed/Typed Name and Title <b>William Siler President</b>				Signature <i>William Siler</i>		Date <b>9-21-18</b>	
	10. Transporter 1 Company Name <b>Bill Siler Contracting Inc</b>				Driver Signature <i>[Signature]</i>			
	Complete Mailing Address <b>P.O. Box 460 South Range Mi 49963</b>				Printed Name and Title <b>Bill Siler Driver</b>			
	Telephone Number (including area code) <b>906-482-8517</b>				Date <b>9-21-2018</b>			
Disposal Site	11. Transporter 2 Company Name				Driver Signature			
	Complete Mailing Address				Printed Name and Title			
	Telephone Number (including area code)				Date			
12. Discrepancy Indication Space								
13. Waste Disposal Site Owner or Operator Special Waste Approval is issued by signature in the case of a Generic Asbestos Approval. Certification of receipt of asbestos materials covered by this manifest except as noted in Item 12.								
Printed/Typed Name and Title <b>Linda Thoreson Specialist</b>				Signature <i>Linda Thoreson</i>		Date <b>9-21-18</b>		

WHITE - Disposal Site

CANARY - Generator  
(To be mailed by Disposal Site)

PINK - Transporter

GOLD - Generator  
(To be taken prior to disposal)



K&W Landfill  
11877 HWY 38  
Ontonagon, MI, 49953  
Ph: 906-883-3504

Reprint  
Ticket# 298020

Customer Name HONEYWELLINT HONEYWELL INTERN Carrier BILLSILERCONTR Bill Siler Contractin  
Ticket Date 10/31/2019 Vehicle# 2028 Volume  
Payment Type Credit Account Container  
Manual Ticket# Driver  
Hauling Ticket# Check#  
Route Billing # 0000509  
State Waste Code Gen EPA ID  
Manifest 924618  
Destination Grid  
PO A0004I4730  
Profile ASB125476MI (SOIL IMPACTED WITH ROOFING MATERIAL WM011A)  
Generator 136-HONEYWELL52986 HONEYWELL

	Time	Scale	Operator	Inbound	Gross	
In	10/31/2019 10:08:04	Scale	LThoreson		Tare	63200 lb 31640 lb
Out	10/31/2019 10:20:48	Scale	LThoreson		Net	31560 lb
					Tons	15.78

Comments HONEYWELL  
52986 HIGHWAY M26  
HUBBELL, MI

Product	LD%	Qty	UOM	Rate	Tax	Amount	Origin
1 Asb Non Fri-Tons-A	100	15.78	Tons				HOUGMI

Total Tax  
Total Ticket

Driver's Signature



Load #1

# WASTE SHIPMENT RECORD / ASBESTOS MANIFEST

(See Reverse for Instructions)

For Disposal Site Use Only

1-A. Special Waste Profile Number ASB125476MI		NESHAP Notified ____ YES ____ NO		WSR Number <b>924618</b>		Elevation _____ North _____ East _____	
1-B. Generator Name, Contact Name, and Complete Mailing Address (Including Zip Code) Honeywell 115 Tabor Road Morris Plains, NJ 07950						1-C. Generator's Phone Number 763-954-5418	
1-D. Work Site Address Honeywell 52986 Highway M-26 Hubbell, MI 49934						1-E. 24 Hour Emergency Response Telephone Number 763-954-5418	
2. Operator's Name and Complete Mailing Address						Operator's Phone Number 1	
3. Waste Disposal Site (WDS) Name and Complete Mailing Address K&W Landfill 11877 State Highway M38, Ontonagon, MI 49953						WDS Phone Number 906-883-3504	
4. Name and Address of Responsible Agency Michigan Dept. of Environmental Quality PO Box 30260, Lansing, MI 489090-7760							
5. Description of Materials Soil Impacted with Roofing Material							
friable asbestos				RQ, NA2212, Asbestos, 9, PGIII		6. Containers No. Type	
non-friable asbestos				Cat I _____ Cat II <u>5</u>		7. Total Quantity yd3 <b>15.78 tons</b> 16	
8. Special Handling Instructions and Additional Information 24 HOUR NOTICE GIVEN PRIOR TO DISPOSAL, MUST BE BURIED							
9. GENERATOR/OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations. I hereby certify that the asbestos is not contaminated with hazardous, PCB, and/or any special waste.							
Printed/Typed Name and Title Michael J. McManus				Signature <i>[Signature]</i>		Date 10-31-19	
10. Transporter 1 Company Name B.I. Siler Contracting Complete Mailing Address 45505 Champion St South Range MI 49763 Telephone Number (including area code) 906 482 8518				Driver Signature <i>[Signature]</i> Printed Name and Title Richard Bleise Jr. Date 10-31-19			
11. Transporter 2 Company Name Complete Mailing Address Telephone Number (including area code)				Driver Signature  Printed Name and Title  Date			
12. Discrepancy Indication Space							
13. Waste Disposal Site Owner or Operator Special Waste Approval is issued by signature in the case of a Generic Asbestos Approval. Certification of receipt of asbestos materials covered by this manifest except as noted in Item 12.							
Printed/Typed Name and Title Linda Thompson Operations Specialist				Signature <i>[Signature]</i>		Date 10-31-19	



K&W Landfill  
11877 HWY 38  
Ontonagon, MI, 49953  
Ph: 906-883-3504

Reprint  
Ticket# 298027

Customer Name HONEYWELLINT HONEYWELL INTERN Carrier BILLSILERCONTR Bill Siler Contractin  
Ticket Date 10/31/2019 Vehicle# 535 Volume  
Payment Type Credit Account Container  
Manual Ticket# Driver  
Hauling Ticket# Check#  
Route Billing # 0000509  
State Waste Code Gen EPA ID  
Manifest 924619  
Destination Grid  
PO A000414730  
Profile ASB125476MI (SOIL IMPACTED WITH ROOFING MATERIAL WM011A)  
Generator 136-HONEYWELL52986 HONEYWELL

	Time	Scale	Operator	Inbound	Gross	
In	10/31/2019 10:50:18	Scale	LThoreson		Tare	66100 lb 31400 lb
Out	10/31/2019 11:06:11	Scale	LThoreson		Net	34700 lb
					Tons	17.35

Comments HONEYWELL  
52986 HIGHWAY M26  
HUBBELL, MI

Product	LD%	Qty	UOM	Rate	Tax	Amount	Origin
1 Asb Non Fri-Tons-A	100	17.35	Tons				HOUGMI

Total Tax  
Total Ticket

Driver's Signature

# WASTE SHIPMENT RECORD/ASBESTOS MANIFEST

(See Reverse for Instructions)

For Disposal Site Use Only

Generator	1-A. Special Waste Profile Number ASB125476MI	NESHAP Notified ____ YES ____ NO	WSR Number <b>924619</b>	Elevation _____ North _____ East _____
	1-B. Generator Name, Contact Name, and Complete Mailing Address (including Zip Code) Honeywell 115 Tabor Road Morris Plains, NJ 07950			1-C. Generator's Phone Number 763-954-5418
	1-D. Work Site Address Honeywell 52986 Highway M-26 Hubbell, MI 49934			1-E. 24 Hour Emergency Response Telephone Number 763-954-5418
	2. Operator's Name and Complete Mailing Address			Operator's Phone Number
	3. Waste Disposal Site (WDS) Name and Complete Mailing Address K&W Landfill 11877 State Highway M38, Ontonagon, MI 49953			WDS Phone Number 906-883-3504
Generator	4. Name and Address of Responsible Agency Michigan Dept. of Environmental Quality PO Box 30260, Lansing, MI 48909-7760			
	5. Description of Materials Soil Impacted with Roofing Material		6. Containers No. Type	7. Total Quantity yd3
	friable asbestos	RQ, NA2212, Asbestos, 9, PGIII		<b>17.35 tons</b> 16
	non-friable asbestos	Cat I _____ Cat II <u>5</u>		
8. Special Handling Instructions and Additional Information 24 HOUR NOTICE GIVEN PRIOR TO DISPOSAL, MUST BE BURIED				
9. GENERATOR/OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations. I hereby certify that the asbestos is not contaminated with hazardous, PCB, and/or any special waste.				
Printed/Typed Name and Title <i>Michael J. McGowan</i>		Signature <i>Michael J. McGowan</i>		Date 10/31/19
Transporter	10. Transporter 1 Company Name <i>B.I. Siler Contracting</i> Complete Mailing Address <i>45805 Champion St</i> <i>South Range MI 49963</i>		Driver Signature <i>Michael McCloskey</i>	
	Telephone Number (including area code) <i>906 482 8578</i>		Printed Name and Title <i>Michael McCloskey</i>	
	11. Transporter 2 Company Name		Date <i>10-31-19</i>	
	Complete Mailing Address		Driver Signature	
Disposal Site	Telephone Number (including area code)		Printed Name and Title	
	12. Discrepancy Indication Space		Date	
	13. Waste Disposal Site Owner or Operator Special Waste Approval is issued by signature in the case of a Generic Asbestos Approval. Certification of receipt of asbestos materials covered by this manifest except as noted in Item 12.			
	Printed/Typed Name and Title <i>Linda Thompson Operations Specialist</i>		Signature <i>Linda Thompson</i>	
		Date <i>10-31-19</i>		



K&W Landfill  
11877 HWY 38  
Ontonagon, MI, 49953  
Ph: 906-883-3504

Reprint  
Ticket# 298034

Customer Name HONEYWELLINT HONEYWELL INTERN Carrier BILLSILERCONTR Bill Siler Contractin  
Ticket Date 10/31/2019 Vehicle# 2029 Volume  
Payment Type Credit Account Container  
Manual Ticket# Driver  
Hauling Ticket# Check#  
Route Billing # 0000509  
State Waste Code Gen EPA ID  
Manifest 924620  
Destination Grid  
PO A000414730  
Profile ASB125476MI (SOIL IMPACTED WITH ROOFING MATERIAL WM011A)  
Generator 136-HONEYWELL52986 HONEYWELL

	Time	Scale	Operator	Inbound	Gross	
In	10/31/2019 11:45:53	Scale	LThoreson		Tare	69300 lb
Out	10/31/2019 11:57:01	Scale	LThoreson		Net	31440 lb
					Tons	37860 lb
						18.93

Comments HONEYWELL  
52986 HIGHWAY M26  
HUBBELL, MI

Product	LD%	Qty	UOM	Rate	Tax	Amount	Origin
1 Asb Non Fri-Tons-A	100	18.93	Tons				HOUGMI

Total Tax  
Total Ticket

Driver's Signature



# WASTE SHIPMENT RECORD/ASBESTOS MANIFEST

(See Reverse for Instructions)

For Disposal Site Use Only

1-A. Special Waste Profile Number ASB125476MI		NESHAP Notified <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		WSR Number <b>924620</b>		Elevation _____ North _____ East _____	
1-B. Generator Name, Contact Name, and Complete Mailing Address (including Zip Code) Honeywell 115 Tabor Road Morris Plains, NJ 07950					1-C. Generator's Phone Number 763-954-5418		
1-D. Work Site Address Honeywell 52986 Highway M-26 Hubbell, MI 49934					1-E. 24 Hour Emergency Response Telephone Number 763-954-5418		
2. Operator's Name and Complete Mailing Address					Operator's Phone Number		
3. Waste Disposal Site (WDS) Name and Complete Mailing Address K&W Landfill 11877 State Highway M38, Ontonagon, MI 49953					WDS Phone Number 906-883-3504		
4. Name and Address of Responsible Agency Michigan Dept. of Environmental Quality PO Box 30260, Lansing, MI 489090-7760							
5. Description of Materials Soil Impacted with Roofing Material							
friable asbestos				RQ, NA2212, Asbestos, 9, PGIII		6. Containers No. Type	
non-friable asbestos				Cat I _____ Cat II <u>✓</u>		7. Total Quantity yd3 <b>16</b>	
8. Special Handling Instructions and Additional Information 24 HOUR NOTICE GIVEN PRIOR TO DISPOSAL, MUST BE BURIED							
9. GENERATOR/OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations. I hereby certify that the asbestos is not contaminated with hazardous, PCB, and/or any special waste.							
Printed/Typed Name and Title <i>Michael J. McEwan</i>				Signature <i>Honeywell</i> <i>Michael J. McEwan</i>		Date <i>10/31/19</i>	
10. Transporter 1 Company Name <i>B.I. Siler Contracting</i> Complete Mailing Address <i>45505 Champion St</i> <i>South Range MI 49763</i> Telephone Number (including area code) <i>906 482 8578</i>							
11. Transporter 2 Company Name				Driver Signature <i>Jordan Klemett</i>			
Complete Mailing Address				Printed Name and Title <i>Jordan Klemett</i>			
Telephone Number (including area code)				Date <i>10-31-19</i>			
12. Discrepancy Indication Space							
13. Waste Disposal Site Owner or Operator Special Waste Approval is issued by signature in the case of a Generic Asbestos Approval. Certification of receipt of asbestos materials covered by this manifest except as noted in Item 12.							
Printed/Typed Name and Title <i>Linda Hresin Operations Specialist</i>				Signature <i>Linda Hresin</i>		Date <i>10-31-19</i>	



K&W Landfill  
11877 HWY 38  
Ontonagon, MI, 49953  
Ph: 906-883-3504

Reprint  
Ticket# 298045

Customer Name HONEYWELLINT HONEYWELL INTERN Carrier BILLSILERCONTR Bill Siler Contractin  
Ticket Date 10/31/2019 Vehicle# 535 Volume  
Payment Type Credit Account Container  
Manual Ticket# Driver  
Hauling Ticket# Check#  
Route Billing # 0000509  
State Waste Code Gen EPA ID  
Manifest 924621  
Destination Grid  
PO A000414730  
Profile ASB125476MI (SOIL IMPACTED WITH ROOFING MATERIAL WM011A)  
Generator 136-HONEYWELL52986 HONEYWELL

	Time	Scale	Operator	Inbound	Gross	94380 lb
In	10/31/2019 13:38:06	Scale	LThoreson		Tare	41620 lb
Out	10/31/2019 14:04:27	Scale	LThoreson		Net	52760 lb
					Tons	26.38

Comments HONEYWELL  
52986 HIGHWAY M26  
HUBBELL, MI

Product	LD%	Qty	UOM	Rate	Tax	Amount	Origin
1 Asb Non Fri-Tons-A	100	26.38	Tons				HOUGMI

Total Tax  
Total Ticket

Driver's Signature

# WASTE SHIPMENT RECORD/ASBESTOS MANIFEST

(See Reverse for Instructions)

For Disposal Site Use Only

1-A. Special Waste Profile Number ASB125476MI		NESHAP Notified ____ YES ____ NO		WSR Number <b>924621</b>		Elevation _____ North _____ East _____	
1-B. Generator Name, Contact Name, and Complete Mailing Address (including Zip Code) Honeywell 115 Tabor Road Morris Plains, NJ 07950					1-C. Generator's Phone Number 763-954-5418		
1-D. Work Site Address Honeywell 52986 Highway M-26 Hubbell, MI 49934					1-E. 24 Hour Emergency Response Telephone Number 763-954-5418		
2. Operator's Name and Complete Mailing Address					Operator's Phone Number		
3. Waste Disposal Site (WDS) Name and Complete Mailing Address K&W Landfill 11877 State Highway M38, Ontonagon, MI 49953					WDS Phone Number 906-883-3504		
4. Name and Address of Responsible Agency Michigan Dept. of Environmental Quality PO Box 30260, Lansing, MI 489090-7760							
5. Description of Materials Soil impacted with Roofing Material							
friable asbestos				RQ, NA2212, Asbestos, 9, PGIII		6. Containers No. Type	
non-friable asbestos				Cat I _____ Cat II <u>5</u>		7. Total Quantity yd3	
8. Special Handling Instructions and Additional Information 24 HOUR NOTICE GIVEN PRIOR TO DISPOSAL, MUST BE BURIED							
9. GENERATOR/OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations. I hereby certify that the asbestos is not contaminated with hazardous, PCB, and/or any special waste.							
Printed/Typed Name and Title Michael J. McCann				Signature <i>Michael J. McCann</i>		Date 10-31-19	
10. Transporter 1 Company Name B.I. Siler Contracting Complete Mailing Address 45805 Champion St South Range MI 49763				Driver Signature <i>Michael McCloskey</i>			
Telephone Number (including area code) 906 482 8518				Printed Name and Title Michael McCloskey			
				Date 10-31-19			
11. Transporter 2 Company Name				Driver Signature			
Complete Mailing Address				Printed Name and Title			
Telephone Number (including area code)				Date			
12. Discrepancy Indication Space							
13. Waste Disposal Site Owner or Operator Special Waste Approval is issued by signature in the case of a Generic Asbestos Approval. Certification of receipt of asbestos materials covered by this manifest except as noted in Item 12.							
Printed/Typed Name and Title Kinda Thoreson, Operations Specialist				Signature <i>Kinda Thoreson</i>		Date 10-31-19	





K&W Landfill  
11877 HWY 38  
Ontonagon, MI, 49953  
Ph: 906-883-3504

Reprint  
Ticket# 298053

Customer Name HONEYWELLINT HONEYWELL INTERN Carrier BILLSILERCONTR Bill Siler Contractin  
Ticket Date 10/31/2019 Vehicle# 2028 Volume  
Payment Type Credit Account Container  
Manual Ticket# Driver  
Hauling Ticket# Check#  
Route Billing # 0000509  
State Waste Code Gen EPA ID  
Manifest 924622  
Destination Grid  
PO A000414730  
Profile ASB125476MI (SOIL IMPACTED WITH ROOFING MATERIAL WM011A)  
Generator 136-HONEYWELL52986 HONEYWELL

	Time	Scale	Operator	Inbound	Gross	
In	10/31/2019 15:25:57	Scale	LThoreson		Tare	82820 lb 31480 lb
Out	10/31/2019 15:38:33	Scale	LThoreson		Net	51340 lb
					Tons	25.67

Comments HONEYWELL  
52986 HIGHWAY M26  
PELKIE, MI

Product	LD%	Qty	UOM	Rate	Tax	Amount	Origin
1 Asb Non Fri-Tons-A	100	25.67	Tons				HOUGMI

Total Tax  
Total Ticket

Driver's Signature

# WASTE SHIPMENT RECORD/ASBESTOS MANIFEST

(See Reverse for Instructions)

For Disposal Site Use Only

Generator	1-A. Special Waste Profile Number ASB125476MI	NESHAP Notified ____ YES ____ NO	WSR Number <b>924622</b>	Elevation _____ North _____ East _____
	1-B. Generator Name, Contact Name, and Complete Mailing Address (including Zip Code) Honeywell 115 Tabor Road Morris Plains, NJ 07950			1-C. Generator's Phone Number 763-954-5418
	1-D. Work Site Address Honeywell 52986 Highway M-26 Hubbell, MI 49934			1-E. 24 Hour Emergency Response Telephone Number 763-954-5418
	2. Operator's Name and Complete Mailing Address			Operator's Phone Number
	3. Waste Disposal Site (WDS) Name and Complete Mailing Address K&W Landfill 11877 State Highway M38, Ontonagon, MI 49953			WDS Phone Number 906-883-3504
	4. Name and Address of Responsible Agency Michigan Dept. of Environmental Quality PO Box 30260, Lansing, MI 489090-7760			
	5. Description of Materials Soil Impacted with Roofing Material		6. Containers No. Type	7. Total Quantity yd3
	friable asbestos		RQ, NA2212, Asbestos, 9, PGIII	<b>25.67 tons</b> 16
	non-friable asbestos		Cat I _____ Cat II <u>5</u>	
	8. Special Handling Instructions and Additional Information 24 HOUR NOTICE GIVEN PRIOR TO DISPOSAL, MUST BE BURIED			
9. GENERATOR/OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations. I hereby certify that the asbestos is not contaminated with hazardous, PCB, and/or any special waste.				
Printed/Typed Name and Title Michael J. McEwan		Signature <i>Honeywell</i> <i>[Signature]</i>	Date 10-31-19	
Transporter	10. Transporter 1 Company Name B.I. Siler Contracting Complete Mailing Address 45505 Champion St South Range MI 49763		Driver Signature <i>[Signature]</i>	
	Telephone Number (including area code) 906 482 8578		Printed Name and Title Richard Bleise Jr.	
			Date 10-31-19	
	11. Transporter 2 Company Name		Driver Signature	
Disposal Site	Complete Mailing Address		Printed Name and Title	
	Telephone Number (including area code)		Date	
	12. Discrepancy Indication Space			
	13. Waste Disposal Site Owner or Operator Special Waste Approval is issued by signature in the case of a Generic Asbestos Approval. Certification of receipt of asbestos materials covered by this manifest except as noted in Item 12.			
Printed/Typed Name and Title Kinda Thoreson Operations Specialist		Signature <i>[Signature]</i>	Date 10-31-19	

**ATTACHMENT D**  
**EGLE RRD Photographic Documentation**











