

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Morrow Power Plant - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial
Morrow Power Plant
C5H3
Comstock Township, MI
Latitude: 42.2883837 Longitude: -85.4962873

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From: Jeffrey Kimble, OSC

Date: 10/15/2012

Reporting Period: 10/3/12 - 10/12/12

1. Introduction

1.1 Background

Site Number:	C5H3	Contract Number:	
D.O. Number:		Action Memo Date:	9/19/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/3/2012	Start Date:	10/4/2012
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000510761	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-critical removal

1.1.2 Site Description

The Site is located at 6900 East Michigan Avenue in Comstock, Kalamazoo County, Michigan. The Site's geographic coordinates are 42°16'48.0" North latitude and 85°29'33.0" West longitude. The Site is bordered to the north by an operational power plant, the Kalamazoo River, residential homes, and East Michigan Avenue; to the east by Morrow Lake; to the south by undeveloped land and some residential homes; and to the west by undeveloped land and some residential homes. The closest residential homes are located approximately 0.25 mile west of the Site and the closest body of water to the Site is Morrow Lake, approximately 110 feet directly east.

The Site contains a single, estimated 10-story decommissioned power plant building located on a largely undeveloped, partially forested lot, with a network of dirt roads and work areas and several smaller shop buildings. Currently throughout the Site are numerous staged piles of debris, trailers, scrap metal, and heavy machinery and equipment. Consumer's Energy constructed this coal-burning power plant building in 1939. Consumer's Energy closed this facility in the late 1980's, and the property was later sold to private industry. Nordic Fuel Supply and their affiliates operated the plant until they closed in 1998. B&B Enterprises & Environmental, LLC (B&B) subsequently purchased the property from the State of Michigan in 1999.

Subsequent to that purchase, metal from inside the power plant building was salvaged for sale. In the process of salvaging metal from the facility, intact asbestos was disturbed which resulted in thousands of cubic yards of friable asbestos abandoned in the on site building.

1.1.2.1 Location

6900 East Michigan Avenue in Comstock, Kalamazoo County, Michigan

1.1.2.2 Description of Threat

Friable loose asbestos and approximately 100 55-gallon drums, and hundreds of smaller containers, of potentially hazardous wastes.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On May 17, 2012, the Michigan Occupational Safety and Health Administration (MIOSHA), supported by MDEQ, requested EPA's assistance in evaluating the site for any potential threats.

EPA performed a site assessment on July 3, 2012. During the site assessment, EPA and its contractors conducted field sampling designed to identify, assess, and collect bulk samples of suspected ACM from inside and outside the power plant building. Written and photographic documentation of site conditions were also recorded.

A Site Assessment Report was issued on July 27, 2012. The following is documented in the Site Assessment Report:

Eight bulk samples and one surface soil sample were analyzed for asbestos in accordance with EPA Method 600/R-93/116, "Method for the Determination of Asbestos in Bulk Building materials," using polarized light microscopy.

Lab analysis indicated asbestos in all six bulk samples collected from inside the power plant building in the following concentrations:

- Sample MPP-ASB-01: 15% chrysotile and 10% amosite asbestos
- Sample MPP-ASB-02: 10% chrysotile and 2% amosite asbestos
- Sample MPP-ASB-03: 15% chrysotile
- Sample MPP-ASB-04: 15% chrysotile and 3% amosite asbestos
- Sample MPP-ASB-05: 12% chrysotile and 2% amosite asbestos
- Sample MPP-ASB-06: 5% chrysotile and 2% amosite asbestos

Lab analysis indicated asbestos in all three samples collected outside the power plant building at the following concentrations:

- Sample MPP-ASB-07: 15% chrysotile asbestos
- Sample MPP-ASB-08: 20% chrysotile asbestos
- Sample MPP-S-01: less than 0.1% asbestos

Throughout the site, several areas contained drums and containers exposed to the weather and without secondary containment.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

As a result of the referral and site investigation, the EPA OSC determined that a Time-critical removal action at this site was warranted. EPA will conduct a cleanup to remove a large portion of the friable asbestos from the site building and will also remove and dispose of drums and smaller containers found to have waste in them.

Once the easily accessed asbestos has been removed, the building will be further stabilized and the remaining asbestos documented so that the information can be handed over to MDEQ and MIOSHA for further actions at the site.

The EPA action is to deal with the immediate threats only.

2.1.2 Response Actions to Date

Wednesday, 10/3/2012

- Mobilized 1 EPA, 1, START, and 6 ERRS personnel, U.S. EPA hazcat trailer, a decon trailer, and an equipment trailer.

Thursday, 10/4/2012

- Conducted site walk through in site building and yard.
- One office trailer and generator delivered to the Site. Electrician was on site to connect power to office trailer.
- Mobilized 4 more ERRS personnel to the site.

Friday, 10/5/2012

- Began clearing debris and work hazards, and designating work zones and parking areas.
- The new crew conducted site walk through to get familiarized with the Site.
- Second office trailer and generator were delivered to the site. Electricians hooked up power.

Saturday, 10/6/2012

- Continued to clear debris from parking area and work zones.

Monday, 10/8/2012

- Cleared out area and constructed a waste staging pad.
- Began clearing out and constructing site building entrance and load out rooms.
- Received 5 loads of gravel to construct load out dock and for road improvements.
- Mobilized 2,000 gallon water truck to site.
- Collected background air samples from inside site building.

Tuesday, 10/9/2012

- Began staging 55-gallon drums, buckets, and containers from around the site yard.
- Third office trailer delivered to the site. Electrician connected power to office trailer and hazcat trailer.
- Constructed wall and door to site building entrance for use in the contamination reduction zone.
- Continued construction of the load out room. This room will be on negative air.
- Collected background air samples in site building.
- 50 soil sampling locations were identified and marked with pin flags.
- 13 of 50 soil samples were collected for asbestos PLM CARB 435 0.1% sensitivity analysis. These samples are for a statistical sampling of outside soils for an extent of contamination survey.

Wednesday, 10/10/12

- Continued collecting drums, buckets, and containers from around the site yard.
- Cleared additional area for a waste staging pad.
- Collected background air samples.
- Collected 36 soil samples and 5 duplicate soil samples for asbestos PLM CARB 435 0.1% sensitivity analysis. One sample location was not sampled due to access.

Thursday, 10/11/2012

- 4 U.S. Coast Guard Strike Team mobilized to the site. The Strike Team will conduct perimeter air monitoring and sampling, and conduct health and safety oversight during removal activities.
- Completed construction of chute in the load out room.
- Completed gathering and staging drums and containers from the site yard.
- Continued with improvements in the site entrance room and strung lights.

Friday, 10/12/2012

- Cleared walkways of debris and maked paths with caution tape inside site building.
- Collected and staged drums and containers inside site building for removal.
- Located and marked sharp edges and trip hazards within work areas in site building.
- One load of gravel was delivered to repair the site drive.
- Emergency Contingency Plan was delivered to local agencies.

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

Ongoing.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Collection of ACM
Complete restaging of drums and containers
Sample and Hazcat drums and containers

2.2.1.1 Planned Response Activities

Collect and dispose of asbestos
Sample and hazcat drums and containers
Conduct perimeter air monitoring and sampling

2.2.1.2 Next Steps

Continue cleanup.

2.2.2 Issues

None

2.3 Logistics Section

ERRS: 3 trailers, 2 decon shower trailers, 3 generators, 4 trucks, 1 water truck.

EPA: Haz cat trailer.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

OSC Jeff Kimble
ERRS Brooks Cooper

2.5.2 Liaison Officer

OSC

2.5.3 Information Officer

OSC

3. Participating Entities

3.1 Unified Command

None, this is an EPA cleanup.

3.2 Cooperating Agencies

Michigan Department of Environmental Quality

Michigan Occupational Safety and Health Administration

4. Personnel On Site

U.S EPA - 1
U.S. Coast Guard Strike Team - 4
ERRS - 12
START - 1

5. Definition of Terms

ACM - asbestos containing materials
EPA - Environmental Protection Agency
ERRS - Emergency and Rapid Response Services
START - Superfund Technical Response and Assessment Team

6. Additional sources of information

6.1 Internet location of additional information/report

6.2 Reporting Schedule

weekly

7. Situational Reference Materials

No information available at this time.

