

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
Morrow Power Plant
C5H3
Comstock Township, MI
Latitude: 42.2883837 Longitude: -85.4962873

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From: Jeffrey Kimble, OSC

Date: 10/22/2012

Reporting Period: October 15-21, 2012

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

On Monday, October 15th, 2012, the crew further improved the site from existing physical hazards and removed waste containers from inside the building and moved them to the staging pad. This completed the staging of waste containers. The containers will be sampled this week and testing will be done later for hazard categorization of the wastes.

On Tuesday, October 16th, 2012, the crew continued to improve the safety of the site building work zone. The second decontamination shower trailer was made operational. The crew initiated asbestos removal from the building. USCG and the contractors conducted particulate monitoring and sampling. Monitoring and sampling will be conducted daily and adjusted as results deem appropriate. Perimeter monitoring may be halted during times of inclement weather.

On Wednesday, October 17th, 2012, the crew completed setup of the load out room and continued removing asbestos bags from the top floor of the building. Eight cubic yard boxes were filled today. USCG conducted perimeter air monitoring and provided health and safety oversight of removal activities.

On Thursday, October 18th, 2012, the crew continued to remove and dispose of asbestos from the top floor into cubic yard boxes. A total of 17 cubic yard boxes were filled and sealed for disposal. U.S. EPA and START opened drums in Level-B and collected samples from drums which required the samples to be collected in Level B PPE. All containers were screened and the remaining drums will be sampled for hazard categorization purposes by the crew.

On Friday, October 19th, 2012, the crew filled and sealed 20 cubic yard boxes of asbestos with material from the top floor of the site building. One enclosed roll-off containing 10 cubic yard boxes of asbestos was picked up for disposal. Perimeter air monitoring was not conducted due to heavy rains. Fifty four soil samples from the exterior extent of contamination survey were shipped to an offsite laboratory for asbestos analysis.

On Saturday, October 20th, 2012, the crew bagged and staged asbestos bags for removal from the building on Monday, October 22, 2012. The crew completed sampling drums in Level-C for hazard categorization analysis.

No site work occurred on Sunday October 21, 2012. Off hours site security continued.

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>
friable asbestos	solid	10 yards	0001		XXXXX

2.2 Planning Section

2.2.1 Anticipated Activities

Collection of friable asbestos
Conduct Hazcatting of samples from waste containers
Continue off site disposal of asbestos

2.2.1.1 Planned Response Activities

Remove friable asbestos from the on site building.
Remove hazardous wastes from site.
Secure building to prevent access to remaining asbestos.

2.2.1.2 Next Steps

Continue cleanup.

2.2.2 Issues

The crew continues to adjust removal techniques to increase production yet maintain safety on site.

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
Hazcatting - Hazard categorization, a testing method used to determine the general chemical class of an unknown compound

6. Additional sources of information

6.1 Internet location of additional information/report

6.2 Reporting Schedule

Periodic, as determined by the OSC. At this point, Polreps will be issued weekly.

7. Situational Reference Materials

No information available at this time.