

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Morrow Power Plant
C5H3
Comstock Township, MI
Latitude: 42.2883837 Longitude: -85.4962873

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From: Jeffrey Kimble, OSC

Date: 10/29/2012

Reporting Period: 10/22/12 - 10/27/12

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

See Initial Polrep for information on site assessment history.

Asbestos and other hazardous waste was found at the site in an abandoned nature.

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 22th, 2012, the crew continued to wet, bag, and remove ACM from the 8th level of the building. Fifteen cubic yards were filled today. Two 30-yard roll-offs of asbestos were shipped off site for disposal. The USCG did not deploy perimeter air monitoring equipment because of rain. ERRS contractor collected four air samples, two samples in the hot zone, one sample outside the contamination reduction zone, and one sample outside the load out room. The samples were sent off site for analysis.

On Tuesday, October 23th, 2012, the crew continued to remove ACM from the Site building and prepare for disposal. Fifteen cubic yard boxes were filled and sealed for disposal. One roll-off containing 20 cubic yard boxes of ACM was shipped off site for disposal. USCG did not conduct perimeter air monitoring due to rain.

On Wednesday, October 24th, 2012, the crew completed additional 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. The chemist began hazard categorization of collected waste samples.

On Thursday, October 25th, 2012, the crew continued to remove and dispose of asbestos from the 8th floor into cubic yard boxes. A total of 13 cubic yard boxes were filled and sealed for disposal. One 20-yard roll-off of ACM was shipped off site for disposal. ERRS collected 130 samples from 5 gallon and smaller containers for hazard categorization analysis. USCG and contractors conducted air monitoring and sampling. A water sample from the Site building basement was collected and delivered to Kar Lab in Kalamazoo, MI for analysis. The ERRS chemist continued hazard categorization of samples.

On Friday, October 26th, 2012, the crew filled and sealed one 20yd roll-off of ACM from the 8th floor of the site building. One enclosed roll-off containing 10 cubic yard boxes of asbestos was picked up for disposal. USCG and contractors conducted air monitoring and sampling. The chemist completed hazcat analysis of all waste samples. The sample data will be compiled for bulking of hazardous materials and disposal.

On Saturday, October 27th, 2012, the crew removed approximately 5 cubic yards of ACM from the 8th floor. USCG and contractors conducted air monitoring and sampling.

No site work occurred on Sunday October 28, 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>Disposal Facility</i>
Friable Asbestos	solid	10 yards	0001	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	0002	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	10 yards	0003	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	0004	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	0005	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	10 yards	0006	Westside RDF 14094 M-60 West Three Rivers, MI

2.2 Planning Section

2.2.1 Anticipated Activities

Collection of friable asbestos
Continue off site disposal of asbestos
Bulk waste streams for disposal

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, 5 trucks, 1 water truck, 1 storage pod.

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.