

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #5
Progress
Morrow Power Plant
C5H3
Comstock Township, MI
Latitude: 42.2883837 Longitude: -85.4962873

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From: Jeff Kimble, OSC and Betsy Nightingale, OSC
Date: 11/12/2012
Reporting Period: 11/5 - 11/10/2012

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, over 200 gas cylinders, several tanks including a 2,500-gallon tank full of waste, more than 110 55-gallon drums, and hundreds of smaller containers of potentially hazardous wastes exists at the site in an uncontrolled manner.

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, November 5th, 2012, the crew continued removal of ACM from the 4th and 5th floors. One 20 yard roll-off of ACM was transported to the landfill for proper disposal. Bulking of the liquid and solid waste streams was initiated. USCG remains on site and assisted the contractors with air monitoring and sampling.

On Tuesday, November 6th, 2012, the crew completed cleanup of the 4th and 5th floors. The lighting and equipment was moved to the 1st, 2nd, and 3rd floors in preparation of ACM removal on those levels. Bulking of waste in drums, buckets, and small containers into totes and overpacks for disposal continued. Air monitoring and sampling continued.

On Wednesday, November 7th, 2012, the crew began clean up of the 2nd and 3rd floors. The crew continued bulking waste for disposal. Air monitoring and sampling continued.

On Thursday, November 8th, 2012, the crew continued cleanup on the 1st, 2nd and 3rd floor and continued bulking waste for disposal. Two mini-loaders were delivered to the Site to aid the removal process on the 1st floor. Air monitoring and sampling continued.

On Friday, November 9th, 2012, the crew completed ACM cleanup and washing of the 2nd and 3rd floors. Two mini-loaders were lifted into the building and the crew continued removal on the 1st floor. The crew filled one 20 yard roll-off of ACM. The outside crew completed bulking all wastes in preparation of disposal. Bulk samples were collected to be sent to an off site laboratory for analysis to support completing the disposal profiles. The samples will be picked by the laboratory courier Monday 11/12. Air monitoring and sampling continued.

On Saturday, November 10th, 2012, the crew continued ACM removal on the 1st floor. RCRA empty drums

were crushed and staged for disposal. Perimeter air monitors were not deployed due to rain, however the remainder of air monitoring and sampling continued..

No site work occurred on Sunday November 11th, 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	001	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	002	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	10 yards	003	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	004	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	005	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	10 yards	006	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	007	Westside RDF 14094 M-60 West Three Rivers, MI
Non Friable Asbestos	solid	20 yards	008	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	009	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
Establish disposal facilities for other waste streams.
Disposal of cylinders

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 cold weather will impact the ability to finish the job site this year. The majority of work will be completed in 2012. However, the sealant spray to limit any further fiber releases inside the building can not be applicated at current temperatures. It is anticipated that this work will not occur until Spring 2013.

2.3 Logistics Section

ERRS: 3 office trailers, 2 decon shower trailers, 4 generators, 6 trucks, 1 water truck, 1 storage pod, 1 skidsteer, 2 mini-loaders, 1 conveyor belt, 1 forklift, 1 storage box, 2 industrial size fans, and 2 pressure

washers.

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
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 - 3
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.