

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #6
Morrow Power Plant
C5H3
Comstock Township, MI
Latitude: 42.2883837 Longitude: -85.4962873

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From: Jeff Kimble, OSC

Date: 12/3/2012

Reporting Period: 11/12 - 12/1/2012

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 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 12th, 2012, the crew continued removal of ACM from the 1st floor. One 20 yard roll-off of ACM was transported to the landfill for proper disposal. The remaining empty drums and containers were cut up and disposed of into 20 yard roll-off. The outside crew began organizing the 211 cylinders in preparation of disposal. USCG did not deploy perimeter air monitors due to rain. The bulk waste samples were picked up by the laboratory courier for analysis for disposal.

On Tuesday, November 13th, 2012, the crew continued removal of ACM from the 1st floor and lido deck. One 20 yard roll-off of RCRA empty drums and containers and one 20 yard roll-off of friable ACM was transported to the landfill for proper disposal. The outside crew continued organizing and decommissioning cylinders for disposal. Air monitoring and sampling continued.

On Wednesday, November 14th, 2012, the crew continued removal of ACM from the 1st floor and lido deck. The crew loaded out one double bagged 20 yard roll-off ACM for disposal. AmeriGas picked up 90 propane cylinders for disposal. Air monitoring and sampling continued.

On Thursday, November 15th, 2012, the crew continued cleanup on the 1st floor and lido deck. One 20 yard roll-off of RCRA empty drums and one 20 yard roll-off of friable ACM were transported to the landfill for proper disposal. The crew completed venting and decommissioning the remaining cylinders. AirGas picked up 21 cylinders for disposal. Air monitoring and sampling continued.

On Friday, November 16th, 2012, the crew continued cleanup on the 1st floor and lido deck. The crew setup the pump and filtration system to begin pumping the water from basement. Air monitoring and sampling continued. The crew secured equipment and site trailers in preparation for a one week shut down with 24 hour security. The crew will mobilize back to the Site November 25th to begin work November 26th.

On Monday, November 26th, 2012, cleanup and ACM removal from the lido deck continued. The crew removed 327 bags of ACM. The basement in the Site building contains approximately 1.5 million gallons of water. The crew began dewatering the basement using a six inch pump and a 5 micron filtering system. Air monitoring and sampling continued.

On Tuesday, November 27th, 2012, ACM removal from the lido deck and dewatering the basement continued. One 20 yard roll-off of ACM was transported to the landfill for proper disposal. A 20 yd scrap metal roll-off was delivered to the Site. One load of 22A road gravel was delivered for Site road maintenance. Air monitoring and sampling continued.

On Wednesday, November 28th, 2012, cleanup and ACM removal from the lido deck continued. One 20 yard roll-off of ACM was transported to the landfill for proper disposal. The crew continued dewatering the basement using the pump and filter system. One 20yd roll-off was filled with the decommissioned cylinders for scrap metal. Air monitoring and sampling continued.

On Thursday, November 29th, 2012, the crew continued cleanup and ACM removal from the lido deck. One 20 yard roll-off of ACM was transported to the landfill for proper disposal. The crew ran 24 hour operations dewatering the basement. Approximately, 20 inches of water remains in the basement. Air monitoring and sampling continued.

On Friday, November 30th, 2012, the crew continued cleanup on the lido deck and dewatering the basement. Scaffolding and additional conveyors delivered to the Site to assist with removal operations in the basement. A 20 yard roll-off of decommissioned cylinders was picked up for scrap metal recycling. Air monitoring and sampling continued.

On Saturday, December 1st, 2012, cleanup on the lido deck and dewatering the basement continued. Air monitoring and sampling 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
Friable Asbestos	solid	20 yards	010	Westside RDF 14094 M-60 West Three Rivers, MI
RCRA Empty Drums/Containers	solid	20 yards	011	Westside RDF 14094 M-60 West

				Three Rivers, MI
Friable Asbestos	solid	20 yards	012	Westside RDF 14094 M-60 West Three Rivers, MI
Non Friable Asbestos	solid	20 yards	013	Westside RDF 14094 M-60 West Three Rivers, MI
RCRA Empty Drums/Containers	solid	20 yards	014	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	015	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	016	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	017	Westside RDF 14094 M-60 West Three Rivers, MI
RCRA Empty Drums/Containers	solid	20 yards	018	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	019	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	020	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.

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

Remove ACM from basement.

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, 1 conveyor belt, 1 storage box, 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.