

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #7
Morrow Power Plant
C5H3
Comstock Township, MI
Latitude: 42.2883837 Longitude: -85.4962873

To: Mark Johnson, ATSDR
Valincia Darby, Department of Interior
Bruce VanOtteren, MDEQ
Joe Walczak, MDEQ
Dan Wyant, MDEQ
Bill Schuette, Michigan Department of Attorney General
Rodney Stokes, Michigan DNR
Todd Goeks, NOAA
Marguerite Matera, NOAA
Wayne Babcock, U.S. Department of Interior
Lindy Nelson, U.S. DOI
Sam Borries, U.S. EPA
Yolanda Bouchee-Cureton, U.S. EPA
Mindy Clements, U.S. EPA
Jason El-Zein, U.S. EPA
Sherry Fielding, U.S. EPA
John Glover, U.S. EPA
Jennifer Manville, U.S. EPA
Thomas Marks, U.S. EPA
Carol Ropski, U.S. EPA
Annette Trowbridge, U.S. Fish & Wildlife
Michelle Watters, ATSDR
Nola Hicks, EPA
Linda Dykema, MDCH
Rob Alvarez, USCG AST
Jennifer Magro, MDEQ
Scott Thelan, MIOSHA
Anthony Casaletta, MIOSHA
Mike McNulty, ITC
Cheryl McIntyre, EPA
Michael Ortega, LEWIS REED & ALLEN P.C.

From: Jeff Kimble, OSC

Date: 12/10/2012

Reporting Period: 12/3 - 12/8/2012

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, December 3rd, 2012, the crew continued to wash the bottom floor, de-water the basement, and set up scaffolding and conveyors. The scaffolding and conveyors were set up to move the bagged ACM from the basement to the load out room for disposal. Air monitoring and sampling continued.

On Tuesday, December 4th, 2012, the crew completed washing the bottom floor. The crew began removing ACM bags from the basement. Dewatering of the basement with a six inch pump through a 5 micron filter continued. One 20 yard roll-off of friable asbestos was transported to the landfill for proper disposal. Air monitoring and sampling continued.

On Wednesday, December 5th, 2012, the crew continued removal of ACM from the basement. One 20 yard roll-off of friable asbestos was transported to the landfill for proper disposal. Air monitoring and sampling continued.

On Thursday, December 6th, 2012, the crew continued removal of ACM from the basement. One 20 yard roll-off of friable asbestos was transported to the landfill for proper disposal. One tank, 2,800 gallons, of combustible liquid waste was pumped out and transported for disposal. Bulked wastes were pumped into totes for disposal. Air monitoring and sampling continued.

On Friday, December 7th, 2012, the crew continued cleanup in the basement. One 20 yard roll-off of friable asbestos was transported to the landfill for proper disposal. The crew continues to pump water from the basement as needed. Air monitoring and sampling continued.

On Saturday, December 8th, 2012, the crew continued ACM removal in the basement. The crew filled and

sealed one 20 yard roll-off in preparation for disposal. Perimeter air monitors were not set up due to rain. There were no Site activities on Sunday, December 9th. Site security continued.

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

Ongoing.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Disposal Facility
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
Friable Asbestos	solid	20 yards	021	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	022	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	023	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	024	Westside RDF 14094 M-60 West Three Rivers, MI
Non-Regulated Liquid (combustible)	liquid	2,800 gallons	025	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	026	Westside RDF 14094 M-60 West Three Rivers, MI

2.2 Planning Section

2.2.1 Anticipated Activities

Collection of friable asbestos.
Remove bags of asbestos waste from the basement.
Continue off site disposal of asbestos
Dispose of 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

Continue to 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.

All asbestos waste that was above the water line in the basement will be removed. However, there appears to be approximately at least one-half foot of sludgy material, including asbestos, covering the entire floor in the basement. This material will be left as it exceeds the scope of the current removal action. This material will likely remain underwater which will eliminate the threat of friable asbestos exposure. However, this will be documented for any future activities or demolition which may occur at the site in the future.

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.