

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #8
Morrow Power Plant
C5H3
Comstock Township, MI
Latitude: 42.2883837 Longitude: -85.4962873

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From: Jeff Kimble, OSC

Date: 12/21/2012

Reporting Period: 12/10 - 12/21/2012

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, 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 10th, 2012, the crew continued removing bags of ACM from the basement and loading out into roll-offs for disposal. Dewatering of the basement with a six inch pump through a 5 micron filter continued as needed. Two 20 yard roll-off of friable asbestos were transported to the landfill for proper disposal. Amerigas picked up two 500 lbs and one 30 lb propane tanks for proper disposal. Air monitoring and sampling continued.

On Tuesday, December 11th, 2012, the crew continued removal of ACM from the basement. Two 20 yard roll-off of friable asbestos were transported to the landfill for proper disposal. Air monitoring and sampling continued.

On Wednesday, December 12th, 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. The remaining 14 cylinders on Site were decommissioned and taken for recycling. Air monitoring and sampling continued.

On Thursday, December 13th, 2012, the crew continued cleanup in the basement. One 20 yard roll-off of friable asbestos and two hazardous waste trucks were loaded and transported to the landfill for proper disposal. The crew continues to pump water from the basement as needed. Air monitoring and sampling continued.

On Friday, December 14th, 2012, the crew continued ACM removal in the basement. The crew filled and sealed one 20 yard roll-off in preparation for disposal. One 20 yard roll-off of friable asbestos was transported to the landfill for proper disposal.

No Site activities Saturday, December 15th and Sunday, December 16th.

On Monday, December 17th, 2012, the crew continued removing ACM from the basement. Two 20 yard roll-off of friable asbestos was transported to the landfill for proper disposal. The crew began boarding up the 1st floor windows. Air monitoring and sampling continued.

On Tuesday, December 18th, 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. Continued to board up windows and put up Warning/Asbestos signs on the Site building. Air monitoring and sampling continued.

On Wednesday, December 19th, 2012, the crew completed removal of ACM from the basement and started to decon equipment in preparation for demobilization from the Site. One 20 yard roll-off of friable asbestos was transported to the landfill for proper disposal. Air monitoring and sampling continued.

On Thursday, December 20th, 2012, the crew continues to prepare to demob from the Site.

On Friday, December 21st, 2012, the crew continues to demob crew and equipment from the Site. On December 26, the three office trailers will be taken from the Site.

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
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
Friable Asbestos	solid	20 yards	027	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	028	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	029	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	030	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	031	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	032	Westside RDF 14094 M-60 West Three Rivers, MI
Flammable Solids	solid	850 gallons	033	EQ Detroit 1923 Frederick St Detroit, MI 48211

Flammable Liquids	liquid	510 gallons	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Corrosive Liquids (acidic)	liquid	110 gallons	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Corrosive Liquids (basic)	liquid	325 gallons	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Flammable Liquids	liquid	650 gallons	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Flammable Liquids	liquid	55 gallons	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Waste, Paint	liquid	5 yards	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Waste, Aerosols	liquid	1 yard	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Non Regulated Material	liquid	55 gallons	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Non Regulated Material	solid	2 yards	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Non Regulated Material	solid	2 yards	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Non Regulated Material	liquid	650 gallons	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Non Regulated Material	liquid	55 gallons	033	EQ Detroit 1923 Frederick St Detroit, MI 48211
Waste, PCBs	solid	340 kg	034	Wayne Disposal Inc., Site #2 49350 N I-94 Service Drive Belleville, MI 48111
PCB's Liquid	liquid	8,200 kg	035	Veolia ES Technical Solutions, Inc Hwy 73 Port Arthur, TX 77640
PCB's Liquid	liquid	450 kg	035	Veolia ES Technical Solutions, Inc Hwy 73 Port Arthur, TX 77640
Friable Asbestos	solid	20 yards	036	Westside RDF 14094 M-60 West Three Rivers, MI
RCRA Empty Drums/Containers	solid	20 yards	037	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	038	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	039	Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards	040	Westside RDF 14094 M-60 West Three Rivers, MI

2.2 Planning Section

2.2.1 Anticipated Activities

Demob site trailers.

Return in Spring 2013 to apply spray adhesive to remaining asbestos.

2.2.1.1 Planned Response Activities

Spray adhesive to remaining asbestos inside Site building this spring.

2.2.1.2 Next Steps

See above.

2.2.2 Issues

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

All loose friable asbestos waste was removed to the extent practicable. However, there appears to be approximately at least one-half foot of sludgy material, including asbestos, covering the entire floor in the basement. Visible loose asbestos was removed from the basement floor, but there are likely fibers throughout the remaining material. 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

DEMOBING ALL RESOURCES.

Final equipment demobilization should occur on December 26th, 2012.

2.4 Finance Section

2.4.1 Narrative

Funding adequate at present time.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$870,000.00	\$783,534.41	\$86,465.59	9.94%
IAGs	\$43,709.00	\$35,971.80	\$7,737.20	17.70%
TAT/START	\$95,000.00	\$66,623.53	\$28,376.47	29.87%
Intramural Costs				
USEPA - Direct	\$45,000.00	\$42,206.00	\$2,794.00	6.21%
USEPA - InDirect	\$90,000.00	\$78,413.00	\$11,587.00	12.87%
Total Site Costs	\$1,143,709.00	\$1,006,748.74	\$136,960.26	11.98%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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

All are demobing.

Security will be on site until remaining equipment leaves on December 26th, 2012.

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

No further reports will be issued until the Spring 2013 remobilization..

7. Situational Reference Materials

No information available at this time.

POLREP #8 Last Updated 12/21/2012