

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #9**
FINAL
Morrow Power Plant
C5H3
Comstock Township, MI
Latitude: 42.2883837 Longitude: -85.4962873

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From: Tricia A. Edwards, OSC

Date: 10/2/2013

Reporting Period: 7/10/13 - 10/2/13

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:	9/27/2013	Completion Date:	10/1/2013
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 conducted a cleanup to remove a large portion of the friable asbestos from the site building and also removed and disposed of drums and smaller containers found to have waste in them.

Once the easily accessed asbestos was been removed, the building was further secured 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 Wednesday, July 10, 2013, EPA and ERRS mobilized to the site. A skid-steer, man-lift, and two roll-off boxes were delivered to the site. The crew's objective was to secure the lower windows of the building as best that they could and load out friable asbestos material that resulted from the demolition of an on-site building. The crew conducted the load out of the asbestos debris in Level C PPE. 2 roll off boxes of mixed construction and asbestos containing debris were shipped off site for disposal.

The building had been secured at the time that the crew demobilized in December, although it was apparent that trespassers had broken into the building. The crew began boarding up the lower windows to deter anyone from breaking into the building. EPA and ERRS met with the local fire chief to discuss emergency entry options. 2 windows were designated to have all of the framing removed, in case the fire department had to make an entry.

On July 11 and 13, 2013, the crew continued to board up the windows on the west and south sides of the building. The overhead door and man door on the south side of the building was welded shut to prevent trespassers from gaining entry. On July 13 - EPA and ERRS demobilized from the site.

The OSC chose not to conduct any additional work on site at this time because a potential purchase agreement was in discussion for the property. It was decided to put the site work on hold temporarily until it is determined who, if anyone is going to purchase the property.

As of September 1, 2013, it appeared the the purchase agreement discussions had stalled. Therefore, the week of September 16, EPA and ERRS mobilized back to the site to further secure the building. Due to the number of broken windows, EPA put forth an effort to try and contain any potential material from being blown outside of the building. A heavy geo-fabric was used in the existing frames to help prevent any material

from inside the building to get out of the building. Parts of the building appear to be structurally unsound. In these areas the crew was directed to avoid and cover as best that they could. The crew worked on site until Thursday, September 26 and demobilized on Friday, September 27.

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
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
Friable Asbestos	solid	20 yards		Westside RDF 14094 M-60 West Three Rivers, MI
Friable Asbestos	solid	20 yards		Westside RDF 14094 M-60 West Three Rivers, MI

Stand Alone	Acres Protected	40
	Number of contaminated residential yards cleaned up	0

Assessment	Human Health Exposures Avoided	20
	Number of workers on site	15
Contaminant(s) of Concern		
Contaminant(s) of Concern	Asbestos, Flammables, Corrosives,	

2.2 Planning Section

2.2.1 Anticipated Activities

No further actions are anticipated at this time.

2.2.1.1 Planned Response Activities

No further actions are anticipated at this time.

2.2.1.2 Next Steps

See above.

2.2.2 Issues

None

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

OSC

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 personnel have demobilized from site.

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

No information available at this time.

7. Situational Reference Materials

No information available at this time.

