# INTERIM RESPONSE CONSTRUCTION SUMMARY REPORT FOR ASBESTOS CONTAINING BUILDING MATERIALS ABATEMENT

Abandoned Mining Wastes – Torch Lake Non-Superfund Site CHLL Hubbell Processing Area Houghton County, Michigan Site ID# 31000098



**APRIL 2017** 

PREPARED FOR: MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY REMEDIATION & REDEVELOPMENT DIVISION CALUMET FIELD OFFICE CALUMET, MICHIGAN



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## 1.0 INTRODUCTION

The Mannik & Smith Group, Inc. (MSG) has prepared this *Interim Response Construction Summary Report for Asbestos Containing Building Materials Abatement* (CSR) as part of the Abandoned Mining Wastes – Torch Lake non-Superfund Site (Project) <u>http://www.michigan.gov/deq/0,4561,7-135-3311\_4109\_9846\_76560---,00.html</u> (Site ID: 31000098). This CSR summarizes the asbestos containing building material (ACBM) abatement interim response (IR) completed at the Calumet & Hecla Lake Linden Operations Area (CHLL) Hubbell Processing Area Mineral Building and Coal Dock properties. The IR entailed the removal and disposal of ACBM adjacent to the Mineral Building, including outside the fence line in the Michigan Department of Transportation (MDOT) right of way. The Hubbell Processing Area is located in Hubbell, Houghton County, Michigan. This CSR was prepared in accordance with the *Indefinite Scope Indefinite Delivery (ISID) Discretionary Proposal for FS and Remedial Action Activities* (24 February 2016) prepared by MSG in response to a request from the Michigan Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD), Calumet Field Office under MSG's 2015 Environmental Services ISID Contract Number 00538 with the State of Michigan.

#### 1.1 Project Location

The Project area is located along the shoreline and in Torch Lake, Houghton County, Michigan. Due to the complex nature and very large area RRD subdivided the Project into study areas based on past use and known issues. Depicted on *Figure 1, Project Location Map* are the CHLL and Calumet and Hecla Tamarack City Operations Area (CHTC) areas and their respective former industrial operations.

Centralized around Calumet & Hecla's copper mining and processing operations near Lake Linden and Hubbell, Michigan, the CHLL consists of approximately 155 acres of land extending approximately two miles along the shoreline of Torch Lake and incorporates over 40 different parcels with multiple property owners.

The CHLL Hubbell Processing Area is located between Lake Linden and Hubbell along the southeast side of Highway M-26 and is comprised of three mining era industrial properties including the Hubbell Coal Dock and Mineral Building that are vacant, and the Hubbell Smelter that is the location of an operating industrial facility. The Hubbell Processing Area is bordered by residential (single-family residences and an apartment complex), commercial (restaurant and retail business), and industrial (sand and gravel pit, construction company, and manufacturing) land uses, and Torch Lake. The IR for ACBM abatement was limited to two properties within the Hubbell Processing Area, the Mineral Building and Hubbell Coal Dock. *Figure 2, Roofing Material Debris Removal Area*, depicts features and the areas of ACBM abatement within the Hubbell Processing Area.

## 1.2 Project Background

Copper mining was extensive in the Keweenaw and formed the backbone of the regional economy and society. Copper ore milling and smelting operations conducted from the mid-1860s to the 1960s, included the importation, reprocessing, and smelting of various scrap metals in the later years of operation. Consistent with past industrial practices, Torch Lake served as dumping grounds for virtually all mining industry related waste products produced, including tailings, slag, and various chemicals. It is estimated that at least 20 percent of the Torch Lake's volume was filled with tailings and other waste products.

The environmental legacy resulting from over 100 years of mining and reclamation led to Torch Lake and its western shoreline to be designated as a Superfund site by the United States Environmental Protection Agency (EPA) <u>https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0503034</u> and a Great Lakes Area of Concern by the U.S./Canada Great Lakes Water Quality Agreement <u>https://www.epa.gov/torch-lake-aoc</u> The EPA undertook cleanup activities to address some of the byproducts of the mining industry while others were not addressed or left to recover through natural processes.

The DEQ Project is addressing some of the remaining concerns in Houghton County not addressed by the EPA. The Project concerns involve groundwater, surface water, sediments, and "upland" media. Known or

suspected problems which are being evaluated include: an unidentified, significant in-lake and/or terrestrial source of polychlorinated biphenyls (PCBs); uncharacterized waste deposits and >750 uncharacterized drums on the lake bottom; slag; landfills; industrial ruins; coal storage areas; underground storage tanks (USTs); residual process materials (RPM); asbestos containing materials (ACM); and any other waste materials identified during future investigations.

During 2014 and 2015, RRD conducted Site Investigation activities and confirmed the remaining concerns in the Project area involve groundwater, surface water, sediments, and "upland" media. Priority concerns which were evaluated and deemed to require IRs include: significant terrestrial sources of PCBs; ACM; RPM; abandoned mining era containers; seeps; limited areas of soil in which there are Direct Contact Criteria (DCC) and Particulate Soil Inhalation Criteria (PSIC) exceedances; and, physical hazards.

In the case of the Hubbell Processing Area Mineral Building and Coal Dock properties, the identified risks pose potential threats to human and ecological receptors, including but not limited to human health risks in the event of direct contact with affected media and inhalation of particulates and asbestos; physical hazards; and, erosion and deposition of contaminated soils into Torch Lake. ACBM, specifically roofing material that had fallen and/or been blown off the roof of the Mineral Building was present on the ground surface, including outside of the fenced Hubbell Processing Area in a publically accessible right of way. The damaged and friable or potential to become friable ACBM posed a potential risk to human health as it related to the inhalation pathway. The adjacent publically accessible MDOT right of way includes a sidewalk used heavily by local residents.

Based on these conditions the Upper Peninsula RRD staff prepared an Emergency Procurement Action Form included in *Appendix A, Emergency Procurement Action Form.* Upon authorization, RRD staff completed an IR that removed and disposed of ACBM adjacent to the Mineral Building to mitigate potential risks to human health.

## 2.0 OBJECTIVE AND SCOPE OF WORK

The objective of the IR was to abate ACBM adjacent to the Mineral Building, including the adjacent publically accessible right of way. To meet this objective MSG developed a Trade Contractor (TC) scope of work and assisted DEQ with soliciting bids in accordance with DEQ RRD Emergency Funding and Procurement Procedures.

# 3.0 INTERIM RESPONSE ACTIVITIES

MSG supported the DEQ RRD in the procurement and oversight of a TC during implementation of the IR. The TC selected and retained by the State of Michigan was Upper Peninsula Abatement Company Inc. (UP Abatement) of Negaunee, Michigan. Refer to *Appendix B, Purchase Order*. UP Abatement completed the work in accordance with the TC procurement package included in *Appendix C, Hubbell Processing Area ACBM Abatement Project Revised Scope of Work* during June and July 2016. As required by the National Emission Standards for Hazardous Air Pollutants (NESHAP) for asbestos, the TC provided notice that is included in *Appendix D, Notification of Intent to Renovate/Demolish*. The TC also conducted personal air monitoring during the work, the data for which are included in *Appendix E, Air Sampling Results*. Documentation of ACBM disposal is included in *Appendix F, Waste Management Records*. Photographs of the IR operations are included in *Appendix G, Photographic Log*.

## 4.0 <u>SUMMARY AND CONCLUSIONS</u>

The following ACBM Abatement IR operations were completed at the Mineral Building and Coal Dock properties within the Hubbell Processing Area:

• Picked-up, contained, and transported for disposal all visible pieces of ACBM/roofing material within Area A, Area B, and Area C adjacent to the Mineral Building totaling 11.81 tons of ACBM.

The completed IR operations temporarily met the objective of ACBM abatement to mitigate potential risks to human health.

# 5.0 <u>RECOMMENDATIONS</u>

MSG has the following recommendation:

• Because roofing material continues to fall and blow off the Mineral Building periodic monitoring and ongoing ACBM abatement as required to maintain the IR's effectiveness.









**Emergency Procurement Action Form** 



## **EMERGENCY PROCUREMENT ACTION FORM**

Site Name: Abando	oned Minir	ng Wastes	County: Houghton
Index: 44251	PCA:	30870	Project #: 456990
ERD Staff Contact:	Amy Ker	anen	Date of Emergency: May 2016
District Supervisor's	s Signatu	re: <u>Chij</u>	Hon Clark 6/10/16

Site Description: The Hubbell Coal Dock and Mineral Building portion of the Calumet and Hecla Lake Linden Operations Area (CHLL) consists of a combined approximately 45-acre area where polychlorinated biphenyls (PCBs) and metals contaminated soil, asbestos containing building materials (ACBM), abandoned drums, coal pile residuals, and other mining wastes are present on the ground surface. Due to deterioration of a large mining-era structure, ACBM, primarily roofing material, is concentrated on the ground surface in an approximate eight-acre area around the structure. In early May 2016 ACBM was also observed up to the paved public roadway shoulder which is frequented by children and recreational users. The ACBM is also across from a residential area. Asbestos concentrations in one bulk black asphaltic roofing material sample contained asbestos fibers at concentrations greater than 1 percent (%). The damaged and friable or potential to become friable nature of the roofing material poses a potential risk to human health as it relates to the inhalation pathway. Although, asbestos fibers were not detected in a limited number of soil samples collected from the study area, the exposed nature of these materials, makes them subject to further degradation that could potentially impact surface soils at the Hubbell Coal Dock and Mineral Building properties. The identified conditions warrant an emergency response action to mitigate potential risks to human and ecological receptors. Failure to undertake an emergency response action will allow for the ongoing potential exposure risk.

**Cause of Emergency:** Roofing material containing asbestos has blown off of a large deteriorating mining-era structure. The ACBM is present on the ground surface in publically accessible areas and is subject to being blown around inside and outside the short perimeter fence.

**Specific Threats:** ACBM is present on the ground surface across from a residential area and readily available to recreational users of the adjacent well-used paved roadway shoulder, as well as people accessing the properties. The area is generally open and the ACBM is subject to being blown around. Some asbestos is also present in grassy shoulder areas subject to seasonal mowing, which could break-down and spread the material further. The damaged and friable or potential to become friable nature of these materials pose a potential risk to human health as it relates to the inhalation pathway.

Action Taken: Because of the imminent threat the emergency procurement process is being utilized to contract ACBM removal from the ground surface and proper disposal. The presence of publically accessible asbestos was observed in early May 2016 and budget estimates were obtained to judge funding needs. Specifications have been developed and a Pre-Bid Meeting is scheduled for June 2, 2016 to obtain firm bids for the work. Bids obtained on June 9, 2016 have been evaluated and U.P. Abatement Company, Inc has been notified they are the successful bidder at \$22,026.00

Additional Information:

Funding Source: Contingency Funds allocated to #31000098 Abandoned Mining Wastes project

Authorized by:

**Responsible Party:** 

Cost Recovery:





#### STATE OF MICHIGAN

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GRAND TOTAL			22,026.	00
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#### STATE OF MICHIGAN

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PENALTY: FAILURE TO DELIVER MAX	Y RESULT IN CAN	CELLATION OF (	ORDER OR C	CONTRACT

**APPENDIX C** 

Hubbell Processing Area ACBM Abatement Project Revised Scope of Work



Hubbell Coal Dock and Mineral Building Interim Response

Revised Asbestos Containing Building Materials Removal Scope of Work

The Michigan Department of Environmental Quality (MDEQ) identified the presence of asbestos containing building materials (ACBM) around the Mineral Building at the Hubbell Coal Dock and Mineral Building properties in Hubbell, Michigan. **Figure 1** depicts the project location.

To reduce potential exposure to the public, MDEQ will remove and properly dispose pieces of ACBM, specifically pieces of roofing materials which have apparently fallen off of the roof of the Mineral Building. **Figure 2** depicts the approximate limits of the work along with existing sample results. Removal will consist of picking up pieces of roofing material, either by-hand and/or through use of an appropriate vacuum with high-efficiency particulate air (HEPA) filter as may be appropriate to the material size. The short duration work in the Michigan Department of Transportation (MDOT) right of way (ROW) does not require a permit per communication from MDOT. However, use of a high visibility traffic vest is required along with other personal protective equipment (PPE). Work in the MDOT ROW should occur between 9:00 am and 11:00 am.

Cutting branches off the shrubs on the northwest side of the Mineral Building up to a height not to exceed four feet to facilitate access for material removal is acceptable. Pruning shall be kept to the minimum necessary to access the area for removing roofing material. Clean and smooth thinning cuts shall be used to remove branches at their points of origin, leaving the bark at the edges of the cuts firmly attached to the wood. Do not leave stubs. Cuts shall be just outside the branch bark ridge and the outer portion of the collar, which is the enlarged area at the branch attachment point. On larger branches a three-cut process shall be used to remove the weight of the branch (first two cuts) prior to making the final cut.

The Contractor is responsible for compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) for asbestos. This includes providing notice to MDEQ and the Michigan Department of Licensing and Regulatory Affairs (LARA). It also includes work practices and engineering controls to prevent asbestos release and visible emissions such as using a water spray as needed. Refer to <u>http://www.michigan.gov/deq/0,4561,7-135-3310-11856--</u>,00.html. All visible pieces of ACBM/roofing material shall be removed from the ground surface and readily reachable tree branches within the areas depicted on **Figure 2**. Suspect and actual ACBM encountered during clean-up activities shall be picked up for disposal such that the clean-up activities do not crush or pulverize the observed material. It is understood that some large material pieces may be broken during pick-up but actions shall be taken to minimize potential asbestos release.

The Contractor shall provide all required waste characterization and profiling, including all sampling and analysis that may be required by the disposal facility for waste acceptance.

The MDEQ shall be provided all waste characterization and disposal documents for review and approval at least two business days in advance of when they are needed. MDEQ will sign all disposal documents as the waste generator.

40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training is required for all on-site persons that may encounter contaminated media. A summary of existing data is provided in **Attachment A**. The Contractor is responsible for their own health and safety, including compliance with 29 Code of Federal Regulations (CFR) Part 1910 and 29 CFR Part 1926.

Refer to **Attachment B** for Conditions for Emergency Bids that will apply to the work. In addition, the selected Contractor must supply the following written information within five business days after receiving a telephone authorization from the MDEQ district Project Manager to start the work:

- Copy of Certificate of Awardability, for contracts over \$100,000.
- Proof of 40-hour hazardous waste safety training for on-site personnel.

Schedule:

- ACBM removal from Area A identified on **Figure 2** shall be completed by 30 June 2016.
- ACBM removal from Area B and Area C identified on **Figure 2** shall be completed by 15 July 2016.
- No on-site work shall occur from 2 July through 4 July 2016.

The following tasks will be required of the Contractor to complete the work. Note that if Work Items 2 and/or 3 are awarded they will be additive to Work Item 1 and will be awarded at the time of Contract award.

<u>Wo</u> 1.	<u>ork Item</u> Pick-up, contain, and transport for disposal all visible pieces of ACBM material within <u>Area A</u> identified on <b>Figure 2</b> . This includes all required notifications, PPE, materials, tools, supplies, equipment, power, water, personnel, mobilization/demobilization, transport,	<u>Contractor Quote</u> A/roofing
	complete the material pick-up and transportation.	\$
2.	Unit rate for <u>Area A</u> disposal from Waste Management = $\frac{40.00}{120.00}$ per ton or $\frac{120.00}{120.00}$ minimum per load for non-friable ACBM.*	\$ <u>120.00</u> (assuming minimum charge)
3.	Pick-up, contain, and transport for disposal all visible pieces of ACBM material within <u>Area B</u> identified on Figure 2. This includes all required notifications, PPE, materials, tools, supplies, equipment, power, water, personnel, mobilization/demobilization, transport, waste characterization, profiles, and manifesting required to complete the material pick-up and transportation.	И/roofing \$
4.	Unit rate for <u>Area B</u> disposal from Waste Management = $$40.00$ per ton or $$120.00$ minimum per load for non-friable ACBM.*	\$ <u>360.00</u> (Assuming 9 tons)
5.	Pick-up, contain, and transport for disposal all visible pieces of ACBM material within <u>Area C</u> identified on Figure 2. This includes all required notifications, PPE, materials, tools, supplies, equipment, power, water, personnel, mobilization/demobilization, transport, waste characterization, profiles, and manifesting required to complete the material pick-up and transportation.	Л/roofing \$
6.	Unit rate for <u>Area C</u> disposal from Waste Management = $\frac{40.00}{120.00}$ per ton or $\frac{120.00}{120.00}$ minimum per load for non-friable ACBM.*	\$ <u>480.00</u> (Assuming 12 tons)
7.	Budgeted amount for other Waste Management charges of tax at \$0.3 per ton, \$20.00 per load environmental fee, and \$100.00 profile fee.*	6 \$ <u>150.00</u>
* _	<b>TOTAL</b> Payment for Items 2. <i>A</i> and 6 will be on a per-ton or per load basis. Payment for It	\$

\* = Payment for Items 2, 4, and 6 will be on a per-ton or per load basis. Payment for Item 7 will be for actual taxes and fees. The number of tons/loads is estimated and may be more or less than the estimated value. Payment to the Contractor for disposal will be at the stated unit rates for the actual quantities disposed to complete the project for the combined number of Areas awarded. FIGURES





ATTACHMENT A



School or It Cake					
MDEO. Part 201 Cleanup Criteria for Response Action					
<ul> <li>1=Statewide Default Background Level</li> <li>2*=Groundwater Surface Water Interface Protection Criteria</li> <li>3=Soil Saturation Concentration Screening Levels</li> <li>4*=Residential Drinking Water Protection Criteria</li> <li>5=Residential Soil Volatilization to Indoor Air Inhalation Criteria (VSIC)</li> <li>6=Residential Finite Source Volatile Soil Inhalation Criteria</li> <li>7=Residential Finite VSIC for 5 Meter Source Thickness</li> <li>8=Residential Direct Contact Criteria</li> <li>10=Residential Direct Contact Criteria</li> <li>11*=Nonresidential Dirinking Water Protection Criteria</li> <li>12=Nonresidential Soil Volatilization to Indoor Air Inhalation</li> <li>13=Nonresidential Direct Contact Criteria</li> <li>14=Nonresidential Soil Volatilization to Indoor Air Inhalation</li> <li>13=Nonresidential Finite VSIC for 5 Meter Source Thickness</li> <li>15=Nonresidential Finite VSIC for 5 Meter Source Thickness</li> <li>15=Nonresidential Finite VSIC for 2 Meter Source Thickness</li> <li>16=Nonresidential Direct Contact Criteria</li> <li>17=Nonresidential Direct Contact Criteria</li> <li>18=Hazardous Waste Toxicity Screening Value</li> <li>* Exceedances of criteria 2, 4, and 11 shown for organics and cyanide only</li> </ul>					
Figure 0.2					
Sample Analytical Result Map					

Building Materials, Containers, and Wastes Hubbell Processing Area Lake Linden, Houghton County, Michigan



The part of the pa
MDEQ Part 201 Cleanup Criteria for Response Action 1=Statewide Default Background Level 2*=Groundwater Surface Water Interface Protection Criteria 3=Soil Saturation Concentration Screening Levels 4*=Residential Drinking Water Protection Criteria 5=Residential Drinking Water Protection Criteria 5=Residential Soil Volatilization to Indoor Air Inhalation Criteria (VSIC) 6=Residential Infinite Source Volatile Soil Inhalation Criteria 7=Residential Finite VSIC for 5 Meter Source Thickness 8=Residential Particulate Soil Inhalation Criteria 10=Residential Direct Contact Criteria 11*=Nonresidential Dirinking Water Protection Criteria 12=Nonresidential Dirinking Water Protection Criteria 13=Nonresidential Soil Volatilization to Indoor Air Inhalation 13=Nonresidential Soil Volatilization to Indoor Air Inhalation 13=Nonresidential Finite VSIC for 5 Meter Source Thickness 15=Nonresidential Finite VSIC for 2 Meter Source Thickness 16=Nonresidential Particulate Soil Inhalation Criteria 17=Nonresidential Finite VSIC for 2 Meter Source Thickness 16=Nonresidential Direct Contact Criteria 17=Nonresidential Direct Contact Criteria 18=Hazardous Waste Toxicity Screening Value * Exceedances of criteria 2, 4, and 11 shown for organics and cyanide only
Figure 9-3a

Sample Analytical Result Map - Soil Hubbell Processing Area - Coal Dock Lake Linden, Houghton County, Michigan





MDEQ Part 201 Cleanup Criteria for Response Action 1=Statewide Default Background Level 2\*=Groundwater Surface Water Interface Protection Criteria 3=Soil Saturation Concentration Screening Levels 4\*=Residential Drinking Water Protection Criteria 5=Residential Soil Volatilization to Indoor Air Inhalation Criteria (VSIC) 6=Residential Infinite Source Volatile Soil Inhalation Criteria 7=Residential Finite VSIC for 5 Meter Source Thickness 8=Residential Finite VSIC for 2 Meter Source Thickness 9=Residential Particulate Soil Inhalation Criteria 10=Residential Direct Contact Criteria 11\*=Nonresidential Drinking Water Protection Criteria 12=Nonresidential Soil Volatilization to Indoor Air Inhalation 13=Nonresidential Infinite Source Volatile Soil Inhalation Criteria 14=Nonresidential Finite VSIC for 5 Meter Source Thickness 15=Nonresidential Finite VSIC for 2 Meter Source Thickness 16=Nonresidential Particulate Soil Inhalation Criteria 17=Nonresidential Direct Contact Criteria 18=Hazardous Waste Toxicity Screening Value \* Exceedances of criteria 2, 4, and 11 shown for organics and cyanide only

#### Figure 9-3b

Sample Analytical Result Map - Soil Hubbell Processing Area - Mineral Building Lake Linden, Houghton County, Michigan ATTACHMENT B



Remediation and Redevelopment Division Department of Environmental Quality Conditions for Emergency Bids

Printed under the authority of the Natural Resources and Environmental Protection Act, PA 451, February 1995, as amended

- 1. INSURANCE: No work connected with this contract shall be started until the contractor has submitted evidence that (a) all workers are insured to protect him/her from claims for damages for personal injury or death which may arise from operations under this contract and that (b) he/she is covered by Property Damage Insurance in the amount of \$100,000 and Public Liability Insurance in the amount of \$100,000-\$300,000. All of the above insurances shall be maintained until final payment is made. The contractor shall assume full responsibility for any damage which may result from any cause including fire or other casualty until completion of the contract and final payment. Any casualties shall not relieve the contractor from performing the contract.
- 2. EMPLOYEES AND SUPERINTENDENT: Contractor shall enforce good order among his/her employees and shall not employ on the work site any disorderly, intemperate, or unfit person or anyone not skilled in the work assigned to him/her. Contractor or a competent person having authority to act for him/her shall be at the work site at all times.
- **3. PROTECTION**: Contractor shall properly protect all new and existing work from damage. Proper safety provisions shall be made at all times for the protection of all persons.
- 4. ROYALTIES, PATENTS, NOTICES, AND FEES: Contractor shall give all notices and pay all royalties, building permits, and fees. He/she shall defend all suits or claims for infringement of any patent rights and shall save the state harmless from loss on account thereof. He/she shall comply with all laws, ordinances, and codes applicable to any portion of the work.
- 5. EXAMINATION OF PREMISES: Bidder shall familiarize himself/herself with local conditions affecting the job. He/she shall take his/her own measurements and be responsible for the correctness of same. Bidder shall be held to have made such examinations and no allowances will be made in his/her behalf by reason of error or omission on his/her part. If any part of the contractor's work depends upon existing work for proper results or the work of another contractor, the contractor shall notify the Department before commencing work of any defects that will affect the results. Failure to so notify will constitute his/her acceptance of the conditions.
- 6. OTHER CONTRACTS: The state may let other contracts in connection with the work and the contractor shall properly connect and coordinate his/her work with the work of such other contractors. The state shall not be liable for any damages or increased costs occasioned by the failure of other contractors to execute their work as may be anticipated by these documents.
- 7. PAYMENT: Payment for the work will be made in one sum upon completion of the work. When applying for payment, the contractor shall submit a statement based upon an itemized schedule. The work will not be considered complete until the work has been finally accepted by the Department of Environmental Quality and the contractor has furnished satisfactory evidence that all payrolls and other indebtedness connected with the work have been paid.

- **8. REGULATIONS:** The contractor shall comply with all authorities having jurisdiction over the work. This includes all applicable federal, state, and local laws, ordinances, rules and regulations.
- **9. PREVAILING WAGES.** The contractor shall comply with Michigan's Prevailing Wage Act, MCL 408.551 et seg. Shall ensure that all employees covered by this act are compensated at a rate not less than those established by the Michigan Department of Consumer and Industry Service as Prevailing Wage and Fringe Benefit rates.

The contractor shall secure all construction permits necessary for proper execution of the work prior to starting work on the project. All fees for securing the permits shall be paid by the contractor, including all inspection costs which may be legally assessed by the Bureau of Construction Codes in accordance with authority granted under 1980 PA 371. All work shall be executed in accordance with the state of Michigan's Construction Codes. If the contractor performs any work knowing it to be contrary to the state of Michigan's Construction Codes, the contractor shall assume full responsibility and shall bear all attributable costs.

The contractor shall conform to the provisions of the Michigan Right to Know law, 1986 PA 80 and all other applicable state and federal health and safety regulations, including U.S. Occupational Safety and Health Administration (29 CFR 1910).

The contractor shall follow all state and federal laws and regulations that govern the handling, transportation, and disposal of material and waste that are deemed part of the work and shall use licensed personnel were appropriate.



MICHIGAN DEPARTMENT OI (MDEQ) AIR QUALITY DIVISI MESHAP 40 CFR Part 61, SU	F ENVIRONMENTAL QUALITY ON bpart M	LARA REG	HIGAN DEPARTMENT OF LICENSING AND ULATORY AFFAIRS (LARA), ASBESTOS PROGRAM, 135 OF 1986, AS AMENDED, Section 220 (1-4) or (8)
1. NOTIFICATION:		4. DEMOLITION CONTRACT	TOR: Internal Project #:
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DEQ (NESHAP) [260 In. ft.760 Sq. ft. or into Planned Renovation - 10 working days Emergency Renovation Scheduled Demolition - 10 working days Intentional Burn - 10 working days notic Ordered Demolition LARA (MIOSHA) [Will not accept annual no Demo, Reno, Encap. (>10 In. ft./15 sq. ft	s notice s notice tifications] t.) 10 <u>calendar</u> days notice	5. FACILITY OWNER: Name: SILVER SHORI Mailing Address: 4550 City/State/Zip: SOUT) E-mail: JChrestensen( Contact: Jed Chresten	Internal Project #: E ENTERPRISES, INC. WILLIAM SILER, PRESIDENT 05 CHAMPION STREET H RANGE, MI 49963 @manniksmithgroup.com sen of Mannik & Smith Group Phone: 906-487-7452
Calculate LARA Asbestos Project Fee:(1% P Total Project Cost: \$22,026.00 Type of Contractor: Type II Licensing Authority: MIOSHA	roject Fee) Time & material x 0.01 = \$220.26 License No: C39239	6. FACILITY DESCRIPTION Facility Name: HUBBE Location Address: M: City/State/Zip: HUBBE County: Houghton	N: ELL MINERAL BUILDING PROPERTY 26 ELL, MI 49934 Age: 0
2. PROJECT SCHEDULE:  Check here if this is a multi-phased project date of each phase.  START DATE  Renovation:  Asb. Removal: 06/27/2016  Demolition:  Encossulation:	, attach a schedule showing the start/end END DATE 07/01/2016	No. of Floors: 0 Nearest Crossroad: Size: (sq. ft.) 5000 Present Use: Vacant i Prior Use: Industrial Specific Location(s) in F	If Apt, # of units: Floor No.: industrial property Facility: On the ground on property
<ul> <li>Includes setup, build enclosure, asbestos remo +Include gely those dates you are conducting as Work Schedule: Please indicate the antici for the purpose of scheduling a compliance page of the Weak</li> </ul>	val, demobilizing, etc. sbestos removalidemo. pated days of the week and work hours e inspection. Work Hours	7. DISPOSAL SITE: Name: K & W Landfill Location Address: 11 City/State/Zip: Ontoni	1 1877 State Highway M38 agon, MI 49953
Asb. Removal: M, Tu, W, Th, F	7:30 a.m. to 5:30 p.m.	8. WASTE TRANSPORTED Name: UPPER PEN	R(S): INSULA ABATEMENT COMPANY INCORPORATED
Demolition: Encapsulation:		Location Address: 34 City/State/Zip: NEGA Name:	19 U. S. HIGHWAY 41 E. UNEE, MI 49856
Check here if the work hours are not the same a day and attach a document with Detailed Work I	cross the days of the week or vary from day to fours.	Location Address: City/State/Zip:	
3. ABATEMENT CONTRACTOR: Inter Name: Upper Peninsula Abatement Compa Mailing Address: 349 East U. S. 41 Highw City/State/Zip: Negaunee, MI 49866 E-mail: dale@upabatementco.com Contact: Dale Carrier	nal Project #: ny, Inc. ay Phone: 906-475-4900	9. ORDERED DEMOLITION Demoition.") A copy of the of Gov't Agency Ordering Name/Title of Person Si Date of Order.	VS: (See NESHAP regulations for definition of "Ordered official Order must accompany this notification. Demo: igning Order: Date Ordered to Begin:

Is asbestos present? (i.e. Assumed or identified in asbestos inspection report) Ves No Will asbestos be removed prior to demolition? Ves No Estimate the amount of asbestos: include RACM (Regulated Asbestos Containing Material) to be removed, encapsulated, etc. Also include the amount and type (floor tile, roofing, etc.) of non-friable Category I and/or Category II ACM that <u>will not</u> be removed prior to demolition, comentatious ACM <u>cannot</u> remain in a structure, as it is likely to become regulated in the demolition/handling process. It <u>must</u> be removed prior to demolition. Also, all asbestos must be removed prior to an intentional burn.)
RACM/ACM RACM to be Non-friable ACM <u>not</u> removed prior to demol.

to be removed	Encapsulated	Category I	Category II	Units of	Measure
				🗋 Ln. Ft.	🔲 Ln. M.
Roofing material scattered on ground		5.000		Ø Sq. Ft.	🔲 Sq. M.
				Cu. FL*	🖸 Cu. M.*

NOTIFICATION OF I	NTENT TO R	ENOVATE/DE	MOLISH (continue	d)	
11. PROJECT DESCRIPTION: Complete A) for Renovation (asbesto	s removal/encapsula	tion) or B) for Demo	lition:		
A) RENOVATION: Mark all surfaces/types of RACM to be remov	ed: E	ncapsulation (for LA	RA): Mark surfaces/types to	be encapsulated.	
Piping     Fittings     Boiler(s)     Tan     Beam(s)     Duct(s)     Tunnel(s)     Ceil     Mag Block     Other (describe):     OFF THE GROUND	ks(s) [] ling Tile(s) [] []	Piping     Image: Constraint of the section of the sect	Fittings Doiler(s) Duct(s) Tunnel(s)	<ul> <li>Tanks(s)</li> <li>Ceiling Tile(s)</li> </ul>	
Method of removal: Describe how the asbestos will be remov Glove Bag Neg. Pressure Cont. Cut into Dry Removal (please provide attachment with a description HAND PICKING	red: sections and remove n and explanation	e ☐ Hand S ☑ Other (o	craping (escribe):		
Complete or Partial (describe part of facility to be defined on the second	emolished):				
Method of Demolition: Describe the method of demolition of Excavator or other heavy equipment Disassi	facility, bridge, etc. embly by hand	Explosives	Other (describe):		
12. ENGINEERING CONTROLS: Describe work practices and engine Water spray to control dust Place in leak tight or HEPA VAC	eering controls used ontainers Ad	to prevent visible em equately wet materia	issions before, during, and a Other (describe)	ifter removal, and until p	oroper disposal
<ol> <li>UNEXPECTED ASBESTOS: Describe the steps you intend to foll (crumbled, pulverized, reduced to powder, etc.) and therefore results and therefore results and therefore results are statistically are statistically and therefore results are statistically are statistically are statistically and therefore results are statistically are statisti</li></ol>	low in the event that egulated:	unexpected RACM i	s found or previously non-fria	able asbestos becomes	friable
Stop Work Wet material Contain SAME AS ABOVE	ct DEQ and abatem	ent contractor	Revise notification	n ⊠ Other (de	scribe):
B) Name, address, and phone number of company performing MUNDELEIN, IL, 60060 C) Name, accreditation number of inspector, and date of inspe	asbestos survey: Nection: MICHAEL C	MESTON SOLUTION	IS, INC., 224-864-7200, 300 b/15/2014	PLAZA CIRCLE, SUITI	E 202,
15. EMERGENCY RENOVATIONS: Date/time of emergen Describe the sudden, unexpected event	cy:				
Explain how the event caused unsafe conditions, and/or would	f cause equipment o	lamage and/or an un	easonable financial burden:		
<ol> <li>I certify that an individual trained in the provisions of 40 CFR Par threshold and/or during an ordered demolition. Evidence that this site.</li> </ol>	t 61, Subpart M, will s person has comple	be on-site during the ted the required train	renovation and during deming will be available for inspi	olition involving RACM a action at the renovation	above the or demolition
Signature of Owner or Abatement/Demolition Contractor	Date	—			
17. Signature Requirements for Projects with Negative Pressure E Per Section 221(1)(2) of P.A. 135 of 1986, as amended, clearar feet or more of friable material which is performed within a ne responsibility under Act 135 to have clearance air monitoring	inclosures: (requir nce air monitoring i gative pressure en performed on this	ed by LARA) s required for any as closure. I (the buildi project.	ibestos abatement project i ng owner or lessee) have b	involving 10 linear feet een advised by the cor	15 square stractor of my
Signature of Building Owner or Lessee	Date	Signature of	Asbestos Abatement Contra	ctor Representative	Date
NOTE: It is not mandatory that a signed copy be sent to LARA unless For affected projects, this section of the notification form must be comp	s requested. leted, signed, and mad	e part of your records t	efore the project begins.		
18. I certify that the above information is correct:					
Printed Name of Owner/Operator	Date	Signature of	Owner/Operator		Date





#### 105 N. Rose St - Ishpeming, MI 49849 Phone (906) 486-4063

Company Name	U P ABATEMENT CO	Date Received	7/8/2016
Project Name	HUBBELL MINERAL BUILDING	Date Analyzed	7/8/2016
Project Number		Analyst	E. GREGORICH
Date of Collection	6/27/2016	1	
Collected By	U P ABATEMENT CO		-7
Filter Lot No		ت Signature	and the second se

H-627         P         PICK UP ROOFING DEBRIS         2         1300         1700         240         480         9.5/100         0.001         N           H-628         P         PICK UP ROOFING DEBRIS         2         0900         1700         480         9.6/100         0.007         N           H-629         P         PICK UP ROOFING DEBRIS         2         0930         1730         540         1080         13/100         0.006         N           H-630         P         PICK UP ROOFING DEBRIS         2         0730         1500         450         1900         6.5/100         0.003         N           H-630         P         PICK UP ROOFING DEBRIS         2         0730         1500         450         900         6.5/100         0.003         N           H-630         P         PICK UP ROOFING DEBRIS         2         0730         1500         450         900         6.5/100         0.003         N           H-630         P         PICK UP ROOFING DEBRIS         2         0730         1500         450         900         6.5/100         0.003         N           H-630         PICK UP ROOFING DEBRIS         Imagetion         Imagetion         Imagetion		Sample Number	Sample TYPE	Location/Person	PUMP	Flow Rate	Start Time	Stop	Total Time	Total VOLUME	Average	Results	8 HR TWA
H-628       P       PICK UP ROOFING DEBRIS       2       0900       1700       460       960       13.5/100       0.007       N         H-629       P       PICK UP ROOFING DEBRIS       2       0830       1730       540       1080       13/100       0.006       N         H-630       P       PICK UP ROOFING DEBRIS       2       0730       1500       450       900       6.5/100       0.003       N         H-630       P       PICK UP ROOFING DEBRIS       2       0730       1500       450       900       6.5/100       0.003       N         H-630       P       PICK UP ROOFING DEBRIS       2       0730       1500       450       900       6.5/100       0.003       N         H-630       P       PICK UP ROOFING DEBRIS       2       0730       1500       450       900       6.5/100       0.003       N         H-630       P       PICK UP ROOFING DEBRIS       2       0730       1500       450       900       6.5/100       0.003       N         H-630       PICK UP ROOFING DEBRIS       PICK UP		H-627	P	PICK UP ROOFING DEBRIS		2	1300	1700	240	480	9 5/100 L	0.001	ΙΝΑ
H-629       P       PICK UP ROOFING DEBRIS       2       0830       1730       540       1080       13/100       0.006       N         H-630       P       PICK UP ROOFING DEBRIS       2       0730       1500       450       900       6.5/100       0.003       N         H-630       P       PICK UP ROOFING DEBRIS       2       0730       1500       450       900       6.5/100       0.003       N         H-630       P       PICK UP ROOFING DEBRIS       2       0730       1500       450       900       6.5/100       0.003       N         H-630       P       PICK UP ROOFING DEBRIS       2       0730       1500       450       900       6.5/100       0.003       N         H-630       P       PICK UP ROOFING DEBRIS       2       0730       1500       450       900       6.5/100       0.003       N         H-630       P       PICK UP ROOFING DEBRIS       2       0730       1500       450       900       6.5/100       0.003       N         H-630       PICK UP ROOFING DEBRIS       PICK UP R		H-628	P	PICK UP ROOFING DEBRIS		2	0900	1700	480	960	13 5/100	0.007	NA NA
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		H-630	P	PICK UP ROOFING DEBRIS		2	0730	1500	450	900	6.5/100	0.000	NA NA
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Comments:

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Contractor:

Standard-Using Phase Constrast Microscopy Method NiCSH 7400 "A" Rules	Sample Abbreviations B= Baseline EX= Excusion A= Area Sample	HEX: Hepa Exhaust SPI≈ Sig Pat Inter LOD = Limit of Detection	OSHA Relative Stendards PEL=Permissable Exposure Limit= 0.1 Fice EL=Excursion Limit=10 Fice ANERA Clearance Standard= 0.01 Fice
~ 이상 이번에 전한 것이 같다. 승규가 가지 않는 것 같아요.	P- Personal	LB= Lab Blank	
e pengang di pang terter di pang terter di pang di pang di pang terter di pang terter di pang terter di pang te	C= Cléarance	FB= Field Blank	
	5	BKG- Background	이 전에 걸쳐 있는 것 같아. 그는 것 같아. 이 것 이 가 있다. 이 가 있는 것 이 가 있다. 이 가 있는 것 이 가 있는 것이 같아. 이 이 가 있는 것이 같아. 이 가 있는 것이 집 않아. 이 가 있는 것이 같아. 이 가 있는 것이 같아. 이 이 이 이 이 이 이 이 이 이 이 이 이 이 이 이 이 이 이

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WAS-E MANAGEMENT	KEW Lat 11877 F Ontonag Pha 906	odfill Mry 38 Jon, MI, 4 5-883-3504	9953			Origi Ticke	na <b>1125836</b> 4 F# 275619
Customer Nome UPPERPE Ticket Date 06/29/2 Payment Type Credit Manual Ticket# Hauling Ticket# Route State Maste Code Manifest 80395 Destination PD Profile AEB1185 Generator 136-MIC	(INSULAD) 016 Account 7901 (NO) 116ANDEPT	I FRIABLE OFENVIRO	PPER Cal Vel Con Dr Chu Bi Ger Ger ASBESTOS	rier UP nicle# 1 stainen iver sck# iling # 1 s EPA ID id s) i DEPARTMED	PERPENINSULA 00003385 NT OF ENVIRO	ABATEM Upp Volum	ier Peninsula ie
Time In 06/29/2016 09:22 Dut 06/29/2016 10:10 Comment: MICHIGAN HUBBLE MI	90 23 Sca 211 Bea DEO IDERAL BU	ale le le MLDING	Oper LThors LThors		Inbound	Bross Tare Net Tops	20960 15 17600 15 3060 15 1.68
Product	LDS	Oty	LIDH	Rate	Tax	Amount	Origin
1 Asb Non Fri-Tens 2 FUEL-Fuel Surcha 3 EVF-L-Standard E	A 100 100 100 100	1,68	Tons % Load				HOUGNT HOUGNT HOUGNT

_	(See Reverse for Instructions)					Elevatio	
I	1-A.Special Waste Profile Number	NESHAP Notified		WSR Number	0395	Licvano	
	1-B. Generator Name, Contact Name, a	TES	NO	ng Zin Code)	1.0	North	Phone Number
	PD. Generator Name, Comaci Name, a	ind complete maning Au		ig the cool	10.0	/ (	
	Elizabet (pro	and Hyperda	200		100	16 + 2	81-4726
	1-D. Work Site Address	Martel Gali	7		1-E, 2	4 Hour Em	Number
	2. Operator's Name and Complete Mail	ing Address			Opera	tor's Phone	e Number
	2411 45 41 E 415	44-			70	350	-27
	3. Waste Disposal Site (WDS) Name an	nd Complete Mailing Add	iress		WDS	Phone Nur	nber
tor	11877 State Hwy. M	38, Ontonagon M	49953		906-	883-350	34
nera	4. Name and Address of Responsible A	gency	ters				
99	1090 US Highway 41	South; South M	arquette, I	VI 49855			
	5. Description of Materials				6. Con No.	tainers Type	7, Total Quantity yd3
	friable asbestos		RQ, NA2	212, Asbestos, 9, PGIII		. (	1.68 Ton
	non-friable asbestos		Cat I	Cat II	90	1	24.15
					14.0	1. J.M.	- Janes
	9. GENERATOR/OPERATOR'S CERTI ping name and are classified, packed, r and accomment regulations. I barehy c	FICATION: I hereby dec marked, and labeled, and	clare that the of are in all res	contents of this consignment are fit pects in proper condition for transpected with bazardous PCB and/or	ully and accurat	ely describ according	ed above by proper ship- to applicable internationa
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ansporter	GENERATOR/OPERATOR'S CERTI ping name and are classified, packed, r and government regulations. I hereby c Printed/Typed Name and Title 10. Transporter 1 Company Name Complete Mailing Address Telephone Number (including area code	FICATION: I hereby det marked, and labeled, and entify that the asbestos is 1/844 e)	clare that the d are in all res s not contamin Signature	Driver Signature Printed Name and Title Date	ully and accurat port by highway r any special wa	ely describ according ste.	ed above by proper ship- to applicable internationa
ansporter	GENERATOR/OPERATOR'S CERTI ping name and are classified, packed, r and government regulations. I hereby c Printed/Typed Name and Title 10. Transporter 1 Company Name Complete Mailing Address Telephone Number (including area code 11. Transporter 2 Company Name	FICATION: I hereby det marked, and labeled, and ertify that the asbestos is 1990 1990 1990 1990	clare that the 5 are in all res 5 not contamin Signature	Driver Signature	ully and accurat port by highway r any special wa	ely describ according iste.	ed above by proper ship- to applicable internationa
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Disposal Site Transporter	P. GENERATOR/OPERATOR'S CERTI ping name and are classified, packed, r and government regulations. I hereby c Printed/Typed Name and Title 10. Transporter 1 Company Name Complete Mailing Address Telephone Number (including area cod 11. Transporter 2 Company Name Complete Mailing Address Telephone Number (including area cod 12. Discrepancy Indication Space 13. Waste Disposal Site Owner or Open Special Waste Approval Certification of receipt of Printed/Typed Name and Title	FICATION: I hereby det marked, and labeled, and ertify that the asbestos is e) e) rator is issued by signature in asbestos materials cove	the case of a red by this mu	Contents of this consignment are fine proper condition for transpated with hazardous, PCB, and/or provide condition for transpated with hazardous, PCB, and/or prover Signature Printed Name and Title Date Driver Signature Printed Name and Title Date Context Data Date Context Data Data Date Context Data Data Data Data Data Data Data Da	ully and accurat port by highway r any special wa	ely describ according iste.	ed above by proper ship- to applicable internationa

WASTE MANAGEMENT	KAW Lan 11877 H Ontonag Ph: 906	dfill Fry 38 Jon, MI, 883-350	19953			Origi Ticke	11258416
Customer Namo HPPEPPE Ticket Date 07/01/2 Payment Type Credit Nonval Ticket# Hauling Ticket# Poute State Waste Code Manifest 80396 Destination PO Profile () Benerator	NTNBULAAB 2016 Account	IPPER PI	FNINS Ca Ve Co Dr Ch Bl Ga Gr	erien UP htole# 1 htoiner ivar eck# lling # n EPA TD id	PERPENINGULF	NDERTEM UPF Volus	ier Deninsulu ie
Time In 07/01/2016 10:18 Dut 07/01/2016 10:37 Comments MICHIGON HUBBELL M HUBBELL	Sc :05 Sca :50 Sca DEC INEPAL BU NI	ale le le HLDING	Oper EThor EThor	ator tean eion	Inbound	Gross Tare Net Tons	23260 16 12120 16 11140 16 5.57
Product	上顶%			Rete	Tax	Anount	Origin
1 1000T-MSW TON 2 EVF-L-Standard E 3 FUEL-Fuel Surcha	100 nv 100 ng 190	5.57	Tons Load X				HOUGMI HOUGMI HOUGMI
and Signature	200				Tat Tat	tal Tax al Tickst	æ

	(See Reverse for Instructions)			LAIN LOT		I OI DIS	posar one use Uniy			
	1-A.Special Waste Profile Number	NESHAP Notified		WSR Number		Elevatio	n			
	A50 118579 MI	YES	NO	8	0396	North	East			
	1-B. Generator Name, Contact Name, a	and Complete Mailing A	ddress (includir	ng Zip Code)	1-0	1-C. Generator's Phone Number				
	Michigan Department	5	ELEU	1 cohran						
	SED OTIVER NO 2	3	05-28	1-4726						
	1-D. Work Site Address	46.34			1-E.	24 Hour En	ergency Response			
	The live I Al	accal instit	11		19	Telephone	Number			
	2. Operator's Name and Complete Mail	ing Address	7		Ope	rator's Phon	e Number			
	349,05 41 E	Hadenalt to			8	16 2	50. 10			
	3. Waste Disposal Site (WDS) Name an	d Complete Mailing Add	dress		WDS	S Phone Nur	nber			
	K & W Landrill									
Lato	FIDTE DEALE FILLY, MI	ae, waanagen M	49803		MOL	H2103-3.51	a.			
anac	4. Name and Address of Responsible Agency State of Michigan, Region 1 Headquartera									
	(290 L/S Highway 41	South, South M	anquette, fl	49866						
	5. Description of Materials	Aug			6. Co	ntainers	7. Total Quantity			
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The product of the start of the start							704 -	281-4706			
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Photo 1: Area A prior to roofing debris removal. Photo taken on 5/6/16.



Photo 3: Areas A and B during roofing debris removal. Photo taken on 6/28/16.



Photo 5: Area C during roofing debris removal. Photo taken on 6/30/16.



Photo 2: Area C prior to roofing debris removal. Photo taken on 6/28/16.



Photo 4: Area B following roofing debris removal. Photo taken on 7/1/16.



Photo 6: Area C after roofing debris removal. Photo taken on 9/19/16.



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