

Analysis of Brownfields Cumulative Alternatives (ABCAs)
Draft Analysis of Brownfields Cleanup Alternatives

Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation

For

Former Post Office, 1300 Military St. Port Huron, MI 48060

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I. Introduction & Background

a. Site Locations

The former Post Office site is located at 1300 Military Street in Port Huron, MI 48060, coordinates: 42.970416, -82.424119. This site is on fee land.

b. Previous Site Use(s) and any previous cleanup/remediation

Historical information from a 2022 Phase I Environmental Site Assessment indicates that the west portion of the Site (along Military Street) consisted of residential use from at least 1887 through the mid-1930s. During this time, Union Street had bisected the northern half of the Site, between Military Street (west) and 4th Street (east). Site development near the former Union Street and 4th Street intersection (northeast portion of Site) had consisted of commercial and industrial use from at least 1887 through the early 1950s. This area had been developed during the late 1800s as the “Phoenix Iron Works”, including a metal foundry, machine shop, blacksmith shop and flask yard. This facility was later known as the “Jenks Ship Building Co.” in the early 1900s. Other commercial/industrial use identified along 4th Street included the Port Huron Construction Co., Port Huron Creamery Co., Yokum Sales & Service, Inc, Blue Water Screw Co. and Marler Collision Service. By 1950, the majority of the Site was vacant.

During the late 1950s, the Site was redeveloped with the current commercial building (including the removal of Union Street) and began operating as the U.S. Post Office. The post office continued to operate from the Site, until ending operations circa 2010. In 2010 Bay Mills Indian Community purchased the site. The building has since been vacant.

Prior records indicate that asbestos containing materials and lead based paint were found in the former Post Office building and some abatement work was completed for these materials in the past.

c. Site Assessment Findings

Environmental Testing & Consulting (ETC) completed an asbestos survey for the Site building (former U.S. Post Office) in 1994. Various asbestos containing materials (ACMs) were identified throughout the building.

ETC also completed a lead paint survey for the Site building in 1996. Lead-based paint was identified throughout the building.

A Baseline Environmental Assessment (BEA) was completed for the former owner, Acheson Ventures, LLC and received by EGLE (BEA: 2335) on March 25, 2004. According to the BEA, asbestos containing materials (ACMs) and lead based paint was present in the Post Office building.

In October, 2023, S.A. Torello Inc. conducted an ACM and universal waste survey. These materials were found throughout the building.

Previous environmental assessments have revealed a variety of contaminants present in the soil due to historical uses occurring on and adjacent to the site.

d. Project Goal

The overall purpose of a cleanup at this site is to allow the property to be redeveloped while mitigating risks posed to human health and the environment. The cleanup goals for this site are listed below.

- Safely remove and properly dispose of ACMs and universal wastes found in the structure.
- Demolish and remove the structure on the site. This will eliminate the health concern posed to the public.
- Cap the site with clean fill
- Conduct cleanup operations that are compliant with applicable state and federal standards and will protect human health and the environment

II. Applicable Regulations and Cleanup Standards

a. Cleanup Oversight Responsibility

The cleanups will be overseen by the Tribal Brownfields Program and Environmental Program, in coordination with U.S. EPA Region 5 and MI EGLE. Certified contractors will be hired to conduct the cleanup.

b. Cleanup Standards for major contaminants

These standards will follow rules and regulations during the cleanup tasks and activities:

§ Michigan EGLE Cleanup Criteria Requirements for Response Activity (formerly the Part 201 Generic Cleanup Criteria.)

c. Laws & Regulations Applicable to the Cleanup (briefly summarize any federal, tribal, state, and local laws and regulations that apply to the cleanup)

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act; State of Michigan Cleanup Criteria Requirements for Response Activity; Tribal laws. The cleanup contractor will be required to follow OSHA and EPA regulations and notifications. Federal, State and Tribal laws regarding procurement of contractors to conduct the cleanup will be followed. In addition, all appropriate permits (e.g., notify before you dig, soil transport/disposal manifests) will be obtained prior to the work commencing.

III. Evaluation of Cleanup Alternatives

Each of the potential cleanup alternatives is evaluated against the following set of four criteria:

1) Compliance

- Compliance with applicable tribal, state and federal regulations.

2) Effectiveness

- Protectiveness of human health and the environment, including workers during implementation;
- Reliability for mitigation of risk in the short-term and long-term effectiveness;
- Reduction of toxicity, mobility, and/or volume of contaminants;
- Ability to achieve the cleanup goals; and
- Resiliency to climate change conditions (including extreme weather conditions such

as flooding).

3) Implementability

- Technical feasibility;
- Availability of required services, materials, and equipment;
- Administrative feasibility;
- Construction feasibility; and
- Maintenance and monitoring requirements.

4) Cost (Conceptual costs for comparative analysis only)

- Amount time, effort, materials, and labor necessary.

The selection of “effectiveness,” “implementability,” and “cost” as evaluation criteria is based upon the EPA’s Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA (EPA, 1988). In addition, the selection of “compliance” as an evaluation criterion is used to take into account variations between federal, state, and/or local regulations, if applicable, on a site-by-site basis.

IV. Cleanup Alternatives

a. Cleanup Alternatives Considered (minimum two different alternatives plus No Action)

To address contamination, three different alternatives were considered, including:

- Alternative #1: No action
- Alternative #2: Safely remove and properly dispose of ACMs and universal wastes found in the structure. Building demolition/removal and capping of site.
- Alternative #3: Continue to monitor site with possible future action or no action

Alternative #1: No Action

Advantages

- No Cost

Disadvantages

- All contamination will still exist.
- Health, environmental, and safety hazards remain
- An eyesore will remain.
- The needs of the community will not be met since the sites cannot be reused with the status quo situation.
- Not compliant with Federal, Tribal, State and City regulations
- No immediate costs, but potential high costs in future due to unlimited liability and deteriorating conditions.
- The “No Action” alternative is technically ineffective

Alternative #2: Building demolition/removal and capping of site.

Advantages

- Safely remove and properly dispose of ACMs and universal wastes found in the structure.
- Demolish and remove building at the Site
- Cap site with clean fill

- Conduct cleanup operations that are compliant with applicable tribal, city, state, federal standards
- Removal of the buildings will eliminate safety, health and environmental risks.
- No longer an eyesore
- This will allow for reuse/redevelopment of these sites.

Disadvantages

- Alternative would incur a moderate amount of time, effort, labor, and material costs to complete the excavation, removal, and disposal of the impacted soil, concrete, and homogenized liquids.
- Estimated total cost is \$22,000 for the removal of ACMs and universal wastes present in the building at the Site.

Alternative #3: Continue to monitor site with possible future action or no action

Advantages

- Continue to monitor the site

Disadvantages

- All contamination will still exist.
- Health, environmental, and safety hazards remain
- An eyesore will remain.
- The needs of the community will not be met since the site cannot be reused with the status quo situation.
- Not compliant with Federal, Tribal and State regulations
- Costs associated with continued monitoring

b. Cost Estimate of Cleanup Alternatives (summary of the compliance, effectiveness, implementability and a preliminary cost estimate for each alternative)

To satisfy EPA compliance, requirements, the effectiveness, implementability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

Summary Comparison of Potential Alternatives

Cleanup Alternative	Compliance	Effectiveness	Implementability	Cost	Comment
Alternative #1: No Action	Compliant	Not effective	Implementable	Low (3 rd)	This alternative does not satisfy the cleanup goals or allow for redevelopment of the site
Alternative #2: Excavation, removal, and disposal of impacted soil, concrete, and homogenized liquids	Compliant	Effective	Implementable	High (1st)	This alternative satisfies the cleanup goals and allows for redevelopment of the sites.
Alternative #3: Continue to monitor site with possible future action or no action	Compliant	Not effective	Implementable	Moderate (2nd)	This alternative does not satisfy the cleanup goals or allow for redevelopment of the site in a timely manner.

c. Recommended Cleanup Alternative

Of the three cleanup alternatives evaluated for selection at the Former U.S. Post Office Site, 1300 Military Street in Port Huron, MI 48060, coordinates: 42.970416, -82.424119, the preferred alternative recommended is: Alternative 2: Safely remove and properly dispose of ACMs and universal wastes found in the structure. Building demolition/removal and capping of site. This alternative was selected based upon overall compliance with city, state and/or federal regulations, effectiveness in protecting human health and the environment in both the short-term and long-term, feasibility of implementation, and cost effectiveness.