

Analysis of Brownfield Cleanup Alternatives
3210 Corunna Road, Flint, Michigan
September 30, 2023



Report Prepared By:
Genesee County Land Bank
452 S. Saginaw Street, 2nd Floor
Flint, MI 48502
(810) 257-3088
Grant Number: BF-00E02711-0

1.0 INTRODUCTION

The Genesee County Land Bank Authority (GCLBA) received EPA Multipurpose Grant funding to assist with assessment and cleanup of specific contaminants on properties within the Innovation District in Flint, Michigan. GCLBA received the subject site through involuntary transfer in December 2021. GCLBA's mission is to return formerly tax foreclosed properties to productive use with responsible owners. Since adding subject site to its inventory, GCLBA has worked with environmental consultants on Asbestos and Hazardous Materials Survey and Phase I Environmental Site Assessments (ESA). Conditions of the property, present contaminants, and potential for unknown contaminants pose barriers to reuse of the site. EPA grant funding is available to address hazardous materials such as asbestos and petroleum contamination. The Analysis of Brownfield Cleanup Alternatives (ABCA) is a required element of the United States Environmental Protection Agency (USEPA) USEPA Hazardous Substances Assessment Grant awarded to the GCLBA. In preparing the ABCA, the GCLBA considered environmental factors, various site characteristics, surrounding properties, land use restrictions, potential future uses, and cleanup goals.

2.0 BACKGROUND

The subject property consists of a 0.367 acre parcel located at 3210 Corunna Road, in Flint, Michigan. The property is developed with a burned and collapsed 2,160 SF single-story warehouse with a basement and associated parking. According to property records, the construction date for the building is 1962.

2.1 Site Location

The site consists of one (1) parcel located at 3210 Corunna Road in City of Flint, in Genesee County, Michigan (herein referred to as "the Site").

2.2 Site Ownership

GCLBA is the sole owner of the Property. The Property was acquired involuntarily through tax reversion in December 2021.

2.3 Previous Site Uses

Prior to 1928, the subject property was developed with two residential dwellings, one each on the north and south portions of the property and a church (later residential) on the southwest portion. By the 1950s, a commercial building was developed on the southeast portion of the subject property. By 1962, the residential dwellings on the southwest portion were demolished and the current building was developed. By 1975, the commercial building on the southeast portion and the residential dwelling on the north portion were demolished. The building collapsed in 2021.

Previous uses include residential, the Church of the Brethren (1930s); Mudge Walter Radio Report (1942); Mac's Restaurant (1950s); Groves Realty (1957-1985); Weeblew Inn (1966) Eklips Hair Salon (1990-1995); and Budget Marketing (2000- 2016).

3.0 SITE ASSESSMENT FINDINGS

The following subsections provide a summary of previous environmental investigations, areas of known contamination, an evaluation of exposure pathways, and an evaluation of known or potential exposures at the Subject Property.

3.1 Asbestos-Containing Materials

Asbestos-Containing Materials (ACMs)– an Asbestos & Hazardous Materials Survey (Hazardous Materials Survey) was completed on June 16, 2022, by Professional Service Industries, Inc. (PSI) an Intertek company as a part of the pre-demolition evaluation.

No ACMs (>1% asbestos) were identified through laboratory analysis during this investigation. However, as the site has burned and is collapsed, the GCLBA assumes that the structure has ACMs and Hazardous materials and will treat it as contaminated during the demolition process.

Regulated ACM (RACM) and Category II Non-Friable ACM must be properly removed by a licensed asbestos abatement contractor prior to demolition that would disturb the material. Federal, State and Local regulations and guidelines should be strictly adhered to when removing the ACM. Category I Non-Friable ACM may often be left in place during demolition if not made friable by cutting, grinding or sanding. If there is a potential for the non-friable materials to be rendered friable by demolition activities, the materials must be removed prior to demolition by a certified asbestos removal contractor utilizing the appropriate engineering controls. If left in place, these materials cannot be recycled or used as clean fill.

HAZMATs

No suspected HAZMAT categories were identified through visual observation during this investigation. However, as the site has burned and is collapsed, the GCLBA assumes that the structure has ACMs and Hazardous materials and will treat it as contaminated during the demolition process.

PSI recommends disposing the hazardous materials identified on the site in accordance with applicable regulations. Any unknown containers present on the site need to be verified through testing followed by proper disposal in accordance with applicable regulations.

3.2 Phase I Environmental Site Assessment

Phase I Environmental Site Assessment - A Phase I Environmental Site Assessment (ESA) was completed on August 8, 2022, by Professional Service Industries, Inc., and Intertek Company. PSI performed the Phase I ESA in conformance with the scope and limitations of ASTM Standard E 1527-13. The assessment revealed the potential for RECs on adjacent properties that could impact the site:

Based on a review of historical sources, the east adjoining property (3116 Corunna) operated as an auto repair business in the 1930s. These types of businesses routinely use

automotive-related hazardous substances and petroleum products. The former operations may include the possible use of USTs, hydraulic hoists, service pits, and floor drains. Potential contaminants associated with these operations include petroleum-based oils, fuels, and lubricants. Therefore, the former operations on the east adjoining property represent evidence of a REC in connection with the subject property.

Based on the findings, additional site investigation activities in the form of subsurface sampling has been recommended at the Site to verify the absence or presence of environmental impact from the adjacent identified RECs. A phase II Environmental Assessment is currently being conducted by PSI.

4.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

The United States Occupational Safety and Health Administration (OSHA) and the United States Environmental Protection Agency (USEPA) both have regulations that are applicable to this project. The OSHA Construction Industry Standard (29 CFR 1926.1101) covers employees engaged in demolition and construction activities likely to involve asbestos exposure. In Michigan, the Michigan Occupational Safety and Health Administration (MIOSHA) Asbestos Program enforces the federal standards. The EPA regulates asbestos application, removal, and disposal of ACMs, under the National Emission Standards for Hazardous Air Pollutants (NESHAP). The asbestos NESHAP protects the public and environment by minimizing the release of asbestos fibers during renovation and demolition activities. In Michigan the Air Quality Division (AQD) of the Michigan Department of Environment, Great Lakes and Energy (EGLE) has been delegated authority to implement the NESHAP program for asbestos. MIOSHA and EGLE are made aware of and provide oversight of asbestos removal projects by receiving and reviewing the “Notification of Intent to Renovate/Demolish” forms, which are required to be submitted a minimum of 10 working days prior to starting work. Other agencies promulgating regulations on asbestos include the Department of Transportation (DOT) – establishing regulations regarding the transport of asbestos. All cleanup work proposed at the property will comply with the above regulations and notification requirements. The proposed cleanup project will comply with all other applicable local, state, and federal regulations not specifically mentioned.

5.0 CLEANUP OBJECTIVES

3210 Corunna is a burned and collapsed commercial building, assumed to have asbestos and hazardous materials as part of the remaining building and remaining debris. Additionally adjacent automotive uses may have impacted the site. The potential exists that there may be petroleum contamination beneath the slab of the structure. The project goal is to clean-up the damaged asbestos, abate the remaining RACMs prior to demolition, remove connected utilities, demolish the buildings, and assess the area for sub-basement impacts. This project will rid the area of a public nuisance and prepare the Property for future redevelopment.

As this site is part of a commercial district, it is envisioned that a new or expanded commercial endeavor would occupy the site, removing blight and increasing economic vitality.

5.1 Cleanup Alternatives

Three alternatives were considered for the Site which include:

- Alternative #1: No Action
- Alternative #2: Remediation of Asbestos-Containing Materials prior to Demolition of Site Structures

5.1.1 Alternative # 1 – No Action Alternative

Effectiveness – The No Action alternative is not effective in controlling or preventing the exposure of ACM contamination at the Site.

Implementation – No Action is easy to implement since no actions will be conducted.

Cost - \$0, but a No Action alternative would leave the Site in its existing condition making it undesirable for redevelopment, and difficult to obtain private interest for the redevelopment of the Site. Additionally, there will be costs to secure the building that will continue indefinitely.

Summary - The Site would be left in the current burned and collapsed state. The ACMs would still pose a health risk to legal and illegal visitors entering the buildings. Transfer of the property to other parties would require notification of the presence of asbestos-containing materials and existing RECs, and controls would be necessary to manage exposure to those entering the buildings. Under the No Action Alternative, if the Site remains unused for an extended period, the Site will continue to deteriorate, creating an attractive nuisance and increasing the risk to those entering the Site Building. It is additionally of note that vacant and abandoned buildings in Flint are often the target of arson. The No Action Alternative increases the risk of further fire damage to identified contaminants.

5.1.3 Alternative #2 – Remediation of Asbestos Containing Materials and Demolition of Site Structures

Effectiveness – Removal of ACMs is an effective method for preventing exposure to and stopping further deterioration and exacerbation. As this site is burned and collapsed, abatement would occur as part of a asbestos-containing demolition.

Implementation - Removal and disposal of ACMs and building demolition are technically feasible and are common actions for reducing or eliminating the human health risks of exposure to hazardous building materials. Services and materials are readily available.

Cost – \$39,656

Summary - The ACM Remediation and Building Demolition alternative will properly manage the hazardous building materials and achieves the project goals of providing a Site ready for redevelopment. This alternative provides the safest environment for demolition due to complete removal of ACMs prior to demolition thereby preventing exposure to workers. The

removal of the Site buildings, and marking any subsurface contaminants encountered, will provide the maximum flexibility for site redevelopment.

5.1.4 Recommended Cleanup Alternative

The recommended cleanup alternative is Alternative #2: Remediation of Asbestos Containing Materials and Demolition of Site Structures. Alternative #1: No Action cannot be recommended since it does not address Site risks or project objectives.

Figures

1 Site Location Map

2 Site Features Map

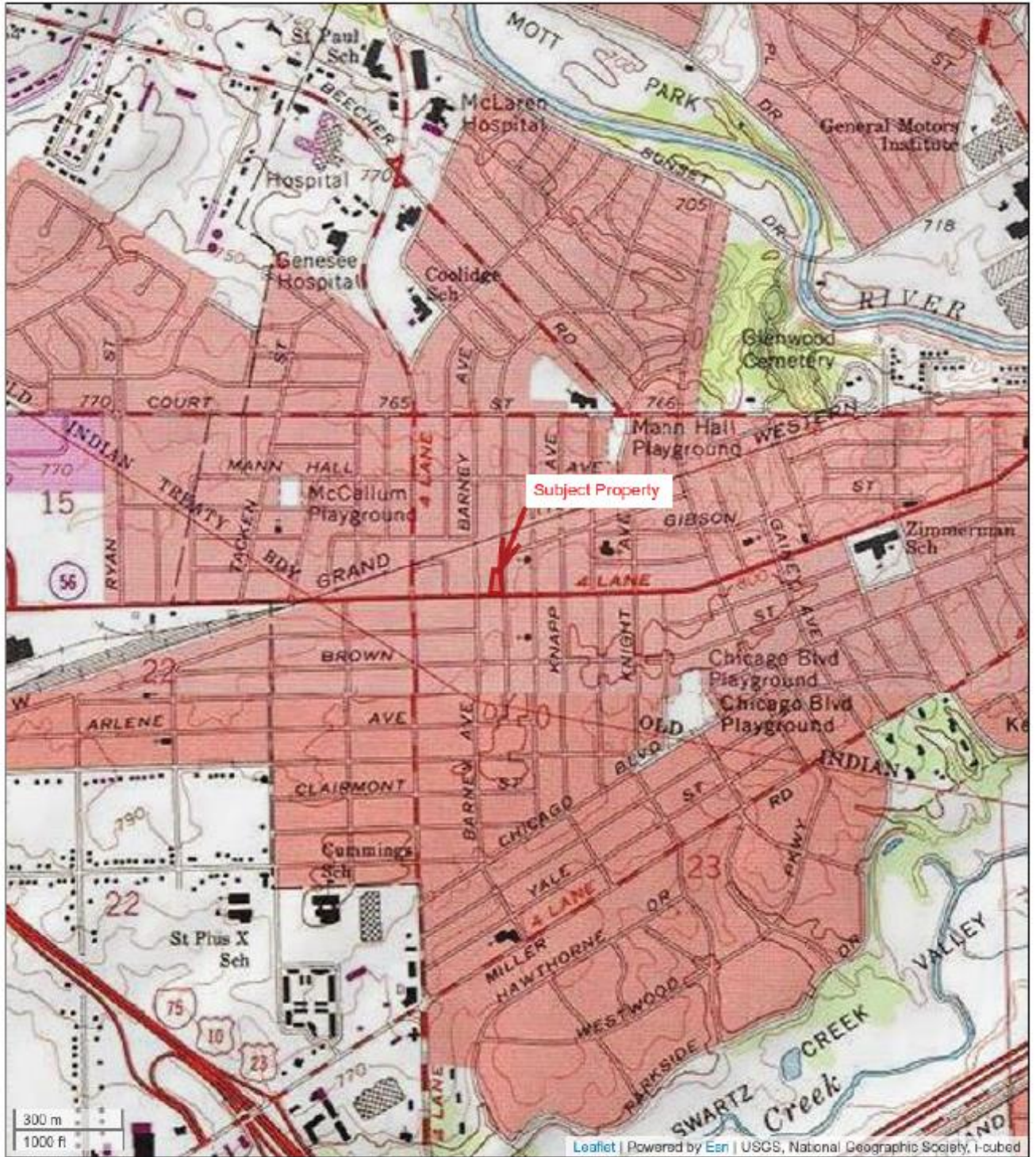


Figure 1 - Topographic Map
 Vacant Property
 3210 Corunna Road
 Flint, Michigan 48503
 Project Number: 0166-1701-4





Figure 2 - Site Vicinity Map

Vacant Property
3210 Corunna Road
Flint, Michigan 48503
Project Number: 0166-1701-4

