



# Former Chippewa Landing

# Environmental Overview

## Two Project Goals:

1. Demolition of Seven On-site Buildings
  - a) Required asbestos abatement prior to demolition
  - b) Lead-Based Paint must be removed or be below a certain threshold
2. Remediation of Petroleum-Contaminated Soils



# Pre-Work Requirements

- Quality Assurance Project Plan (QAPP)
  - Documents all aspects of the work to be performed, including:
    - Data Quality Objectives
    - Quality Assurance Objectives (precision, accuracy, representativeness, etc.)
    - Documentation and Records
    - Data Generation and Acquisition (sampling design, analytical methods, QA/QC, etc.)
    - Data Validation/Useability
  - Must be approved by EPA and Client
- Sampling Analysis Plan (SAP)
  - Project Schedule
  - Project Quality Objectives
  - Sampling Design
  - Decontamination Procedures
  - Field and Analytical Methodologies
- Approved EPA Cleanup Plan
- Project Bidding
- Davis-Bacon (Prevailing Wage) Requirements



# Asbestos – The Miracle Mineral

- Asbestos is a group of naturally-occurring minerals with a needle-like morphology
  - Chrysotile (the most common)
  - Amosite (3-5% in US)
  - Crocidolite (1-3% in US)
  - Tremolite
  - Anthophyllite
  - Actinolite
  - Vermiculite



- Asbestos does not conduct electricity, is chemical-resistant, will not burn, has a tensile strength greater than steel, doesn't degrade from UV light, can be spun into thread, and has good acoustical and exceptional aerodynamic properties
- Asbestos was mined in Canada (stopped in 1994-ish) and Brazil (stopped in 2022). However, asbestos is **STILL** mined today in China, Russia (where 700,000 metric tons were mined in 2023) and Kazakhstan. India stopped mining, but imports asbestos and manufactures asbestos roofing and other asbestos products (pipe, tape, brake pads, etc.)
- Asbestos products manufactured today include; asbestos cement pipe/sheet/shingles, roofing, caulks/glazing, drywall, brakes, clutches, gaskets, etc.
- At last count, over 4,000 products are known to contain asbestos

# Asbestos – The Miracle Mineral

- African and Finnish Pottery with asbestos is known from 4000 years ago.
- Romans made candle wicks from asbestos.
- Norwegians made asbestos candle wicks and asbestos paper in the 1700's.
- Industrial Revolution – use of steam required insulation to reduce heat loss.
- World War II – The US government specified the use of asbestos in many military vehicles.
- 1975 – preformed pipe and boiler insulation banned
- 1978 – spray applied applications (like plaster and structural fireproofing) banned
- 1985 – Transite banned
- 1989 – all new uses of asbestos banned. Overturned by 1991 court action.
- 2024 – Chrysotile ban (can use until 2027 or 2037 in one case)
- Legacy (already present in existing buildings) uses remain and there is no ban that affects those items.



# Asbestos Abatement

- Stuff People Often Forget
  - Asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP)
    - Federal law requiring an asbestos inspection prior to building demolition or renovation activities
  - 10-Day Notification of Intent to Renovate/Demolish
- Two On-Site Buildings Containing Asbestos:

3-Story, 6,550-SF Commercial/  
Residential Building with attached 3,520-  
SF Garage/ Workshop

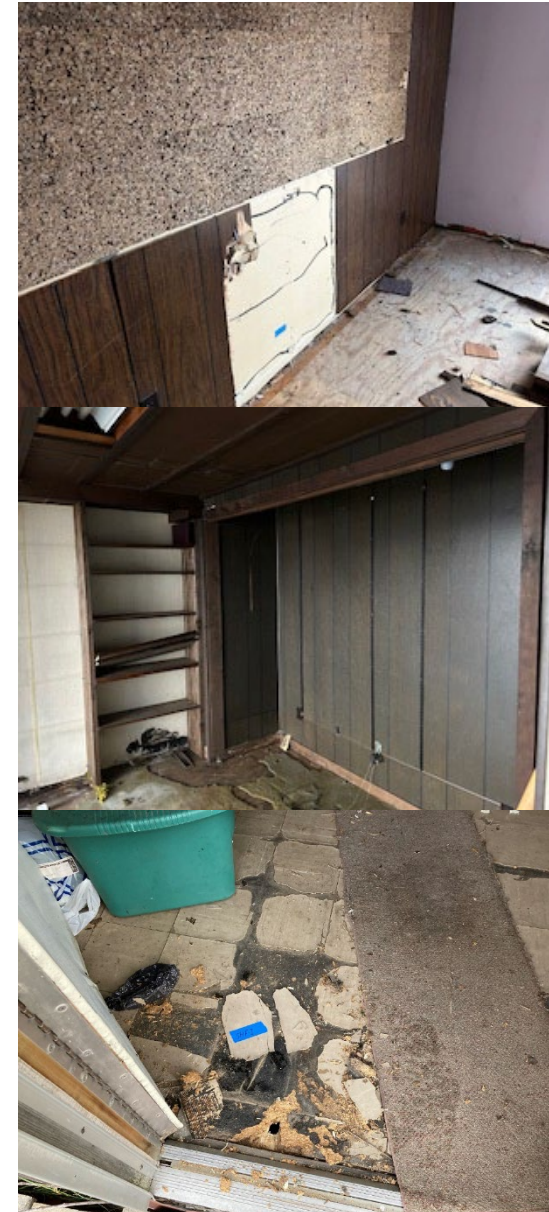


216-SF Shed



# More Asbestos Abatement

- The Big Building
  - 3,300 SF of asbestos-containing mastic between drywall and wood paneling
  - 15 Windows and 33 Doors with asbestos-containing caulk around the frames
  - 88 SF of asbestos-containing sheet flooring
- The Little Building
  - 216 SF of asbestos-containing floor tile



# Even More Asbestos Abatement!

- Asbestos abatement began in November of 2024 (Quality Environmental Services did the abatement)
  - The mastic and sheet flooring in The Big Building and the floor tiles in The Little Building were removed within negative pressure enclosures



- The windows and doors of The Big Building were removed within regulated areas via whole structure removal
- Work area perimeter and worker representative exposure air samples were collected during all abatement work and analyzed for lead and asbestos
  - NO EXCEEDANCES
- All workers wore full-body disposable coveralls and P100 air-purifying respirators

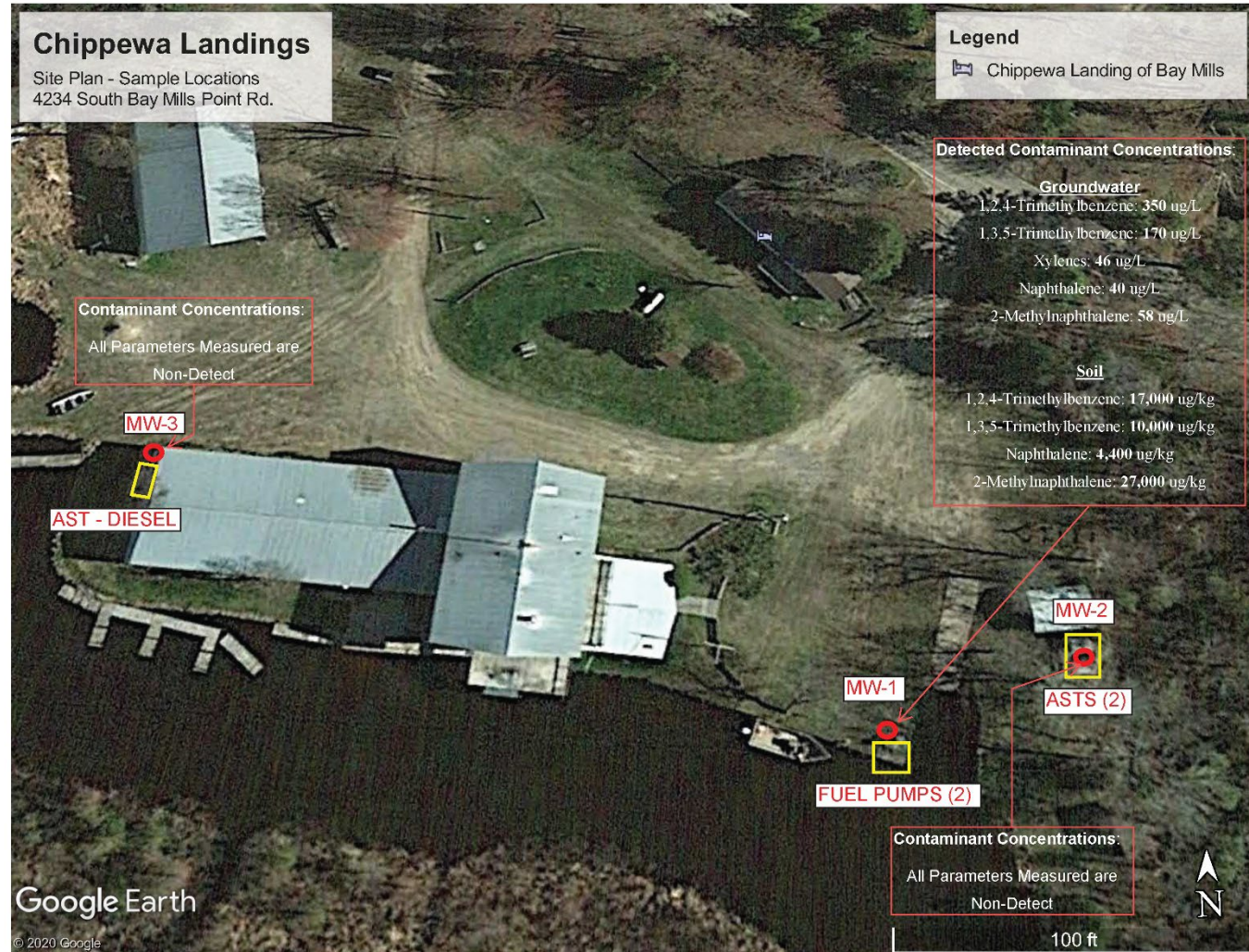
# Demolition aka The Fun Part!

- After asbestos abatement, demolition began
- Before demolition, paint samples were collected from all buildings which contained lead-bearing paint
  - All results were below the threshold for hazardous waste
- ERG oversaw the demolition of the five buildings covered by the grant
- ERG conducted representative exposure monitoring of workers for lead



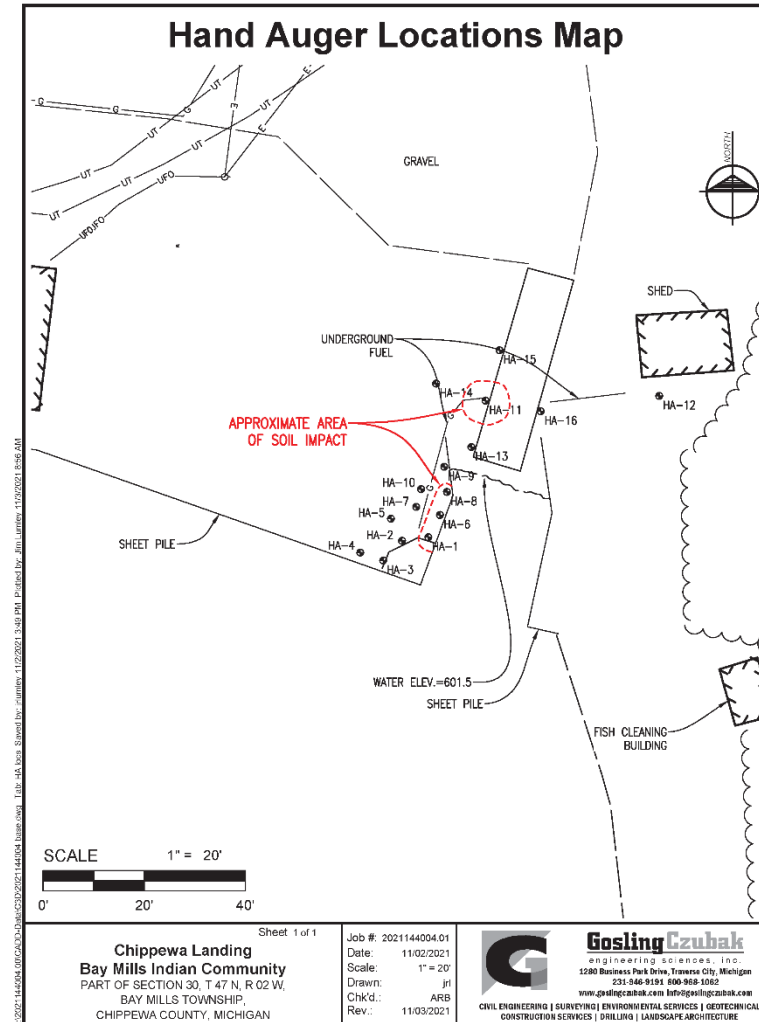
# Environmental Investigations

- Previous investigations on the property identified petroleum-related contaminants above State of Michigan criteria related to former fueling operations
- Soil borings were advanced, and monitoring wells were installed by Mackinac Environmental Technologies in 2020



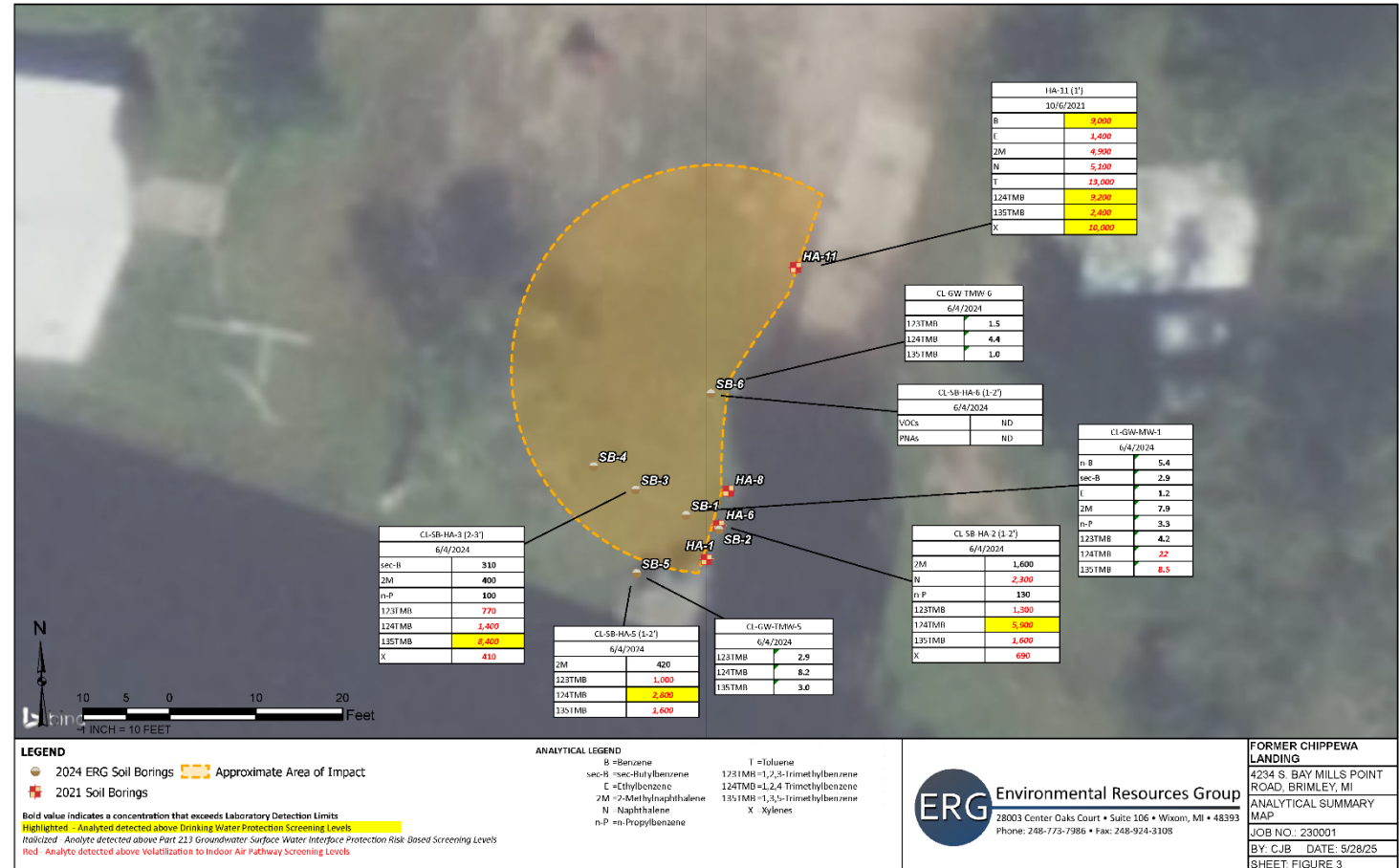
# More Environmental Investigations

- Gosling Czubak advanced 16 hand augur soil borings in 2021 to define the area of impact



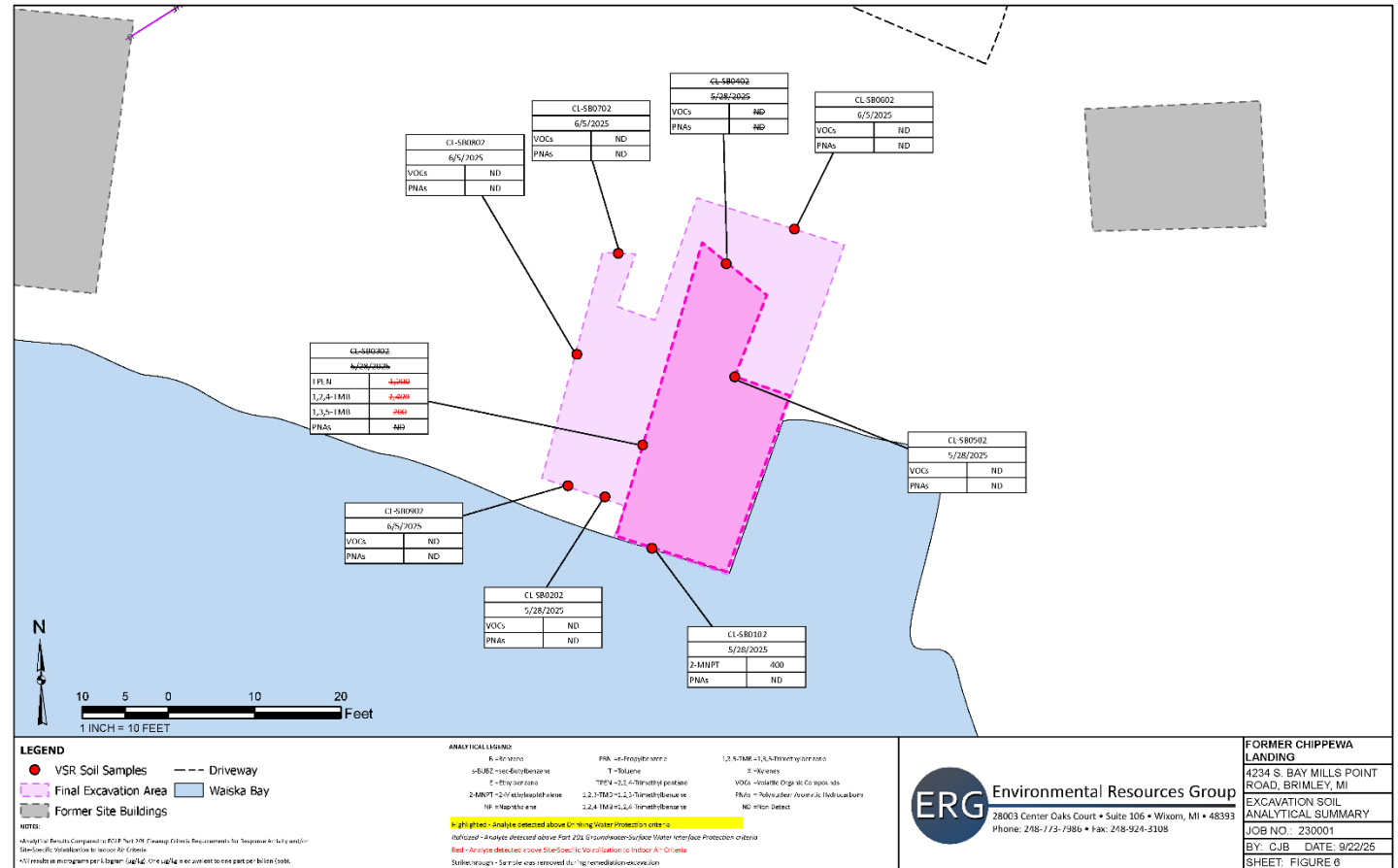
# More More Environmental Investigations

- Following approval of the EPA grant, in 2024, ERG advanced six soil borings and installed two temporary monitoring wells to determine current site conditions before excavation activities began
- The estimated area of impact was ~600 square feet



# Remediation Activities (Dig and Haul)

- A Soil Erosion and Sediment Control Plan and Permit were put in place
- The estimated soil to be removed was 205 tons.
- From May-June 2025, 125.49 tons of contaminated soil were removed from the property by Green For Life (GFL) Environmental
- Soils were excavated to between 3-4 feet below ground surface due to the water table
- Verification of Soil Remediation samples were collected, and no contaminants were identified above Michigan criteria in soils, however...



# Digging and Hauling!





# No Further Action

- In December of 2025, ERG completed a No Further Action (NFA) report for the site
- While the property is planned to be used for nonresidential purposes, the NFA was submitted as an Unrestricted Residential Closure
- The NFA was approved by EGLE on April 16, 2026



STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
REMEDIATION AND REDEVELOPMENT DIVISION



April 16, 2026

CERTIFIED MAIL 9589 0710 5270 3381 7905 05  
RETURN RECEIPT REQUESTED

Bay Mills Indian Community  
Whitney Gravelle  
12410 West Lakeshore Drive  
Brimley, Michigan 49715

Dear Whitney Gravelle:

SUBJECT: Notice of Approval of No Further Action Report for the Former Chippewa Landing Facility  
4234 South Bay Mills Point Road, Brimley, Chippewa County, Michigan  
Facility ID No.: 17000532

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Remediation and Redevelopment Division (RRD), has reviewed the No Further Action (NFA) Report submitted by the Bay Mills Indian Community on December 15, 2025. The NFA Report was submitted under Section 20114d of Part 201 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). Based on this review, the NFA Report is approved.

EGLE has determined that the remedial action described in the NFA Report satisfies the requirements of Part 201 for the unrestricted residential cleanup category provided for in Section 20120a(1) of the NREPA for the facility. Therefore, the NFA Report is approved, and this correspondence serves as the No Further Action Letter, as defined by Section 20101(1)(ee) of the NREPA.

As provided in Section 20126(4)(e) of the NREPA, a person with an approved NFA Report has an exemption to liability for the environmental contamination addressed in the NFA Report but may be subject to liability for environmental conditions under the circumstances described in that subparagraph.

EGLE approval is based upon representations and information contained in the NFA Report for the facility.

EGLE expresses no opinion as to any other contaminants or areas beyond those identified and addressed as described in the NFA Report.

DEBORAH A. STABENOW BUILDING • 525 WEST ALLEGAN STREET • P.O. BOX 30426 • LANSING, MICHIGAN 48909-7926  
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# Thank You! (aka shameless marketing plug)

If you have environmental issues or have any questions, feel free to contact us:

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(248) 773-7986

