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| <b>MONTHLY PROGRESS REPORT 6 – MARCH 2019</b> |
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TO: Brian Kelly, U.S. EPA; Dave Kline, MDEQ      DATE: April 15, 2019

FROM: Tim Francis, Project Manager, ASTI Environmental

C.C.: Steven Kaiser, U.S. EPA, Rich Conforti, MDEQ, Dennis Schreibeis, MSC Land Company, LLC, Todd Goss, MSC Land Company, LLC, Tom Wackerman, ASTI Environmental

RE: **Progress Report  
(Pursuant to Section VIII, Para. 37 of CERCLA Docket No. V-W-18 C-012  
McLouth Steel Facility Trenton, MI)**

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1. **ACTIONS PERFORMED**

- a) Area 4 – Transformer preparation for off-site disposal
- b) Area 6 – Asbestos abatement continues – 90% (excluding galbestos)
- c) Area 7 – Asbestos abatement complete – 100% (excluding galbestos)
- d) Area 9 – Wrapping ACM insulated piping with plastic to abate – 100%
- e) Area 9 – Concrete support pillar demolition – 85%
- f) Area 15 – Sinter Building demolition – 95%
- g) Area 16 – Concrete support pillar demolition – 90%
- h) Area 16 – Lime Storage Bin demolition – 70%
- i) Area 17 – Asbestos abatement – 100% (excluding galbestos)
- j) Area 17 – Galbestos removal and demolition – 35%
- k) Area 18 – Asbestos abatement activities – 100%
- l) Area 18 – Railroad Transfer Building demolition began – 15%
- m) Area 21 – Asbestos abatement activities complete – 100% (excluding galbestos)
- n) Area 21 – Payroll Building demolition complete – 100%
- o) Area 22 – Asbestos abatement activities – 100% (excluding galbestos)
- p) Area 22 - Buildings A and B demolition – 100%
- q) EPA Monthly Report 5 – February 2019 submitted
- r) 15 Transformers (Trans# 11, 13, 17, 18, 19, 19A, 28, 29, 30, 35, 36, 72, 73, 113, #6 Furnace) shipped off-site for disposal
- s) Association of General Contractors courtesy Safety Audit completed
- t) Storm Water retention berm construction – 100%
- u) Silt fence construction – 100%

**2. ANALYTICAL DATA RECEIVED**

- Air Monitoring –
  - Perimeter Dust Monitoring exceeded the NAAQS standard on March 8th, 20th, 21st, and 28<sup>th</sup> on each of these days:
    - The frequency of work site road wetting was increased to reduce airborne particulate matter; and
    - Potential dust generating materials were sprayed with water during demolition activities
  - Real-Time Dust Monitoring was conducted March 1 – 29, Mon. – Fri.
    - Exceedances were addressed immediately by deploying engineering controls and re-monitoring to ensure the controls were mitigating the exceedance
      - Common control measures utilized:
        - Reduction of work speed to reduce the quantity of dust produced over time
        - Applying water to the surface of the dust generating material, such as concrete, during pillar demolition
    - Manganese Sampling occurred on March 8th, 15th, 22nd, and 28th
      - Sampling analyses for these days revealed no exceedance of the ATSDR MRL action level
- Waste Characterization Analyses
  - WMU 15 Wastewater Treatment Plant (several locations)
    - East Clarifier
    - West Clarifier
    - Blue Clarifier
    - Thickener
  - WMU 43 Concast Grit Basin

**3. SCHEDULE FOR COMING MONTH**

- a) Area 5 – Galbestos removal and building demolition
- b) Area 6 – Building demolition
- c) Area 7 – Galbestos removal and outbuilding demolition
- d) Area 8 – Bag House and associated cinder block building demolition
- e) Area 9 – Remove wrapped piping from pipe rack and dispose
- f) Area 16 – Lime Storage Bin demolition continues
- g) Area 16 - Remnant concrete pillar demolition continues
- h) Area 17 – Galbestos removal and demolition continues
- i) Area 18 – Railroad Transfer Building demolition continues
- j) Area 20 – Labor Building historic mercury release remediation
- k) Area 20 – Labor Building demolition begins
- l) Area 22 – Buildings A, B, and C demolition – 100%
- m) Submit sampling notifications for: WMU 1 (Sedimentation Basin), WMU 2 (Oil Processing Tank), and WMU 42 (Concast Scale Pit)
- n) Step-down and Large Transformers scheduled for shipping
- o) Courtesy MIOSHA Health and Safety audit scheduled for April 9

4. **ANTICIPATED PROBLEMS**

- None identified during this reporting period

5. **PLANNED RESOLUTION TO EXISTING/ANTICIPATED PROBLEMS**

- MDEQ Notice of Violation resolution reached on March 12
  - Resolution involves either: a) Wet Method, or b) Using a specialty rubber-tipped shear excavator
  - A voluntary step has been taken to manage all galbestos panels as friable material

6. **OBSERVATIONS**

- a) On March 5, 2019 members of the USEPA Criminal Investigations unit were on site to investigate the ACM bags that were discovered in Area 4, the Mill Building. The members of their team were Rich Porter, Eric Falletich, Todd Garavanta, Jamie Iatropolis, and Erick Thorson, MI DNR. The team took several samples and photos of the materials from the 17 bags of ACM that were in the barricaded area. Allen Offenbecker, Next Generation Abatement Supervisor, escorted them thru the building showing them areas where ACM may have been abated and placed in the bags.
- b) On March 25, 2019 email received from USEPA Criminal Investigation Division authorizing the cleanup and abatement of the area.

7. **DEVIATION FROM WORK PLAN**

- a) None at this time

Please let me know if you have any questions related to this report.

Thank you,

Tim Francis  
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