

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
MCLOUTH STEEL - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
MCLOUTH STEEL
A557_01
Trenton, MI
Latitude: 42.1699480 Longitude: -83.1696370

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From: Brian Kelly, OSC

Date: 3/26/2019

Reporting Period:

1. Introduction

1.1 Background

Site Number:	A557_01	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	1/2/2019
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	YES
FPN#:		Reimbursable Account #:	

Incident Category

Privately Funded CERCLA Cleanup

Site Description and Location

The former McLouth Steel facility originally consisted of 273 acres and operated from 1950 until 1995. In 1995, McLouth filed for bankruptcy. In 1996, the McLouth bankruptcy estate sold the McLouth facility to DSC. DSC tried without success to restart steel operations. In 2000, DSC sold the 76-acre northern portion of the facility to the Riverview-Trenton Railroad Co.

In 2017, Wayne County acquired 183 acres of the 197-acre southern portion through tax foreclosure. Wayne County then entered into a Purchase and Development Agreement with Crown Enterprises/MSD.

On August 6, 2018, Crown/MSD entered into a Settlement Agreement with EPA, MDEQ, and DOJ. The settlement will foster redevelopment by allowing MSD and Crown to clarify their cleanup responsibilities while EPA investigates and later fully addresses existing contamination within the property. The steps to be taken by MSD include:

- Demolish of 45 structures.
- Removing asbestos-containing material, containerized wastes, and materials containing PCBs from all structures before demolition,
- Installing a fence around the property,
- Removing contaminated water and sludges from 23 subsurface structures,
- Investigate five areas where PCBs may have been released, and
- Assessing and reporting on options for stormwater management.

The southern portion is scheduled to be listed on the NPL April 16, 2019.

The northern portion will be addressed under a Corrective Action Consent Order between MDEQ and Riverview-Trenton Railroad Co.

Preliminary Removal Assessment/Removal Site Inspection Results

Multiple environmental reports were issued between 1999-2017. The most recent report issued by ECT Environmental Consulting & Technology, Inc. identified 134 Recognized Environmental Conditions including abandoned debris piles, machinery and equipment, hazardous material storage piles, waste treatment process piles, and other industrial equipment. Many of these identified conditions were located within the southern portion.

More information about the McLouth cleanup can be found at www.epa.gov/superfund/mclouth-steel

2. Current Activities

2.1 Operations Section

Narrative

In December 2018, EPA approved plans submitted by MSD including Dust Control Plan, Liquid and Sludge Removal Plan, PCB Investigation Plan, Site Security Plan Storm Water Management Plan, and Traffic Control Plan.

Site work started in December 2018, and is ongoing. Work is expected to be completed under the settlement by 2022.

Work on the NPL is expected to continue through 2033.

Community Involvement

- o A joint EPA-MDEQ community meeting was held on September 5, 2018. Comments from the community and EPA-MDEQ's responses can be found on the EPA website at www.epa.gov/superfund/mclouth-steel.
- o During the weeks of March 25 and April 8, 2019, EPA and MDEQ will meet with community members on development of a Community Involvement Plan (CIP).
- o EPA and MDEQ have held several calls and meetings with municipal officials and congressional staff to update them on the progress of the cleanup.

December-March Work Progress Update

- o Baseline monitoring and sampling was completed
- o Initial two-week monitoring and sampling was completed
- o Catch basins were fitted with particulate filters
- o Berm construction and silt fencing completed - 90% (prevent sheet flow to the river)
- o 29 PCB Transformers shipped off-site for disposal (Trans# A, B, E, 7, 9, 10, 25, 26, 27, 35, 26, 37, 38, 39, 41, 42, 43, 44, 45, 46, 47, 74, 75, 76, 85, 86, 87, 114, 115)

Demolition and Asbestos Removal

- o Area 1 – Main Office Bldg. asbestos abatement complete – 100%
- o Area 2 – Wash House asbestos abatement complete – 100% (excluding galbestos)
- o Guard Shack and Clock House demolition – 100%
- o No. 3 Finishing and Shipping demolition – 45%
- o Area 5 – Asbestos abatement activities – 90%
- o Area 6 – Asbestos abatement activities continue – 60% (excluding galbestos)
- o Small Outbuildings demolition – 100%
- o Area 8 – EAF Bag House cleaning – 100%
- o Perimeter fence installation – 100%
- o Area 9 – concrete support pillar demolition – 70%
- o Area 10 – Maintenance Building and Spare Parts Warehouse demolition – 100%
- o Area 16 – concrete support pillar demolition – 80%
- o Area 18 – Asbestos abatement activities – 85%
- o Area 21 –Asbestos abatement activities complete – 100% (excluding galbestos)
- o Area 22 – Asbestos abatement activities – 95%

Sampling

- o WMU 15 WWTP Clarifiers 1 & 2
- o AOC 60-b South Motor Room Basement
- o WMU 49 Downcoiler Sump – sampled
- o WMU 51 Six Stand Basement Sump
- o WMU 52 Finish Stand Scale Pit
- o WMU 53 Roughing Mill Scale Pit

- o WMU 54 Old Four High Scale Pit
- o WMU 55 Blooming Mill Scale Pit
- o WMU 56 Reheat Sump
- o WMU 57 Heater Area Drains Sump

Air Monitoring and Sampling

- o Perimeter Air Monitoring and Manganese Sampling Conducted
- o Real-Time Dust Monitoring Conducted

Waste Characterization Analyses

- o AOC 60-b South Motor Room Basement
- o WMU 15 WWTP Clarifiers 1 & 2
- o WMU 47 EAF Bag House Dust
- o WMU 49 Downcoiler Sump
- o WMU 52 Finish Stand Scale Pit
- o WMU 53 Roughing Mill Scale Pit
- o WMU 54 Old Four High Scale Pit
- o WMU 55 Blooming Mill Scale Pit
- o WMU 56 Reheat Sump
- o WMU 57 Heater Area Drains Sump

Universal Waste Collected and Shipped Off-Site for Disposal

- o 4,200 Fluorescent Lamp Tubes
- o 11,000 lbs Misc. Electronic Equipment, incl. TVs
- o 248 units Computer Equipment
- o 124 HID, Mercury Vapor Lamps
- o 790 Incandescent Bulbs, Floods/Spots

2.2 Planning Section

Planned Activities Next 30-Days

- a) Area 7 – Asbestos abatement activities complete – 100% (excluding galbestos)
- b) Area 6 – Asbestos abatement activities continue
- c) Area 9 – Asbestos abatement activities begin on pipe rack
- d) Area 15 – Tranzite abatement complete – 100%
- e) Area 16 - Remnant concrete pillar demolition
- f) Area 17 – Asbestos abatement activities begin
- g) Area 18 - Asbestos abatement activities continues – 85%
- h) Area 21 – Building demolition
- i) Area 22 – Building demolition
- j) Submit sampling notifications for:
- k) AOC 35 – De-kishing Pit
- l) Transformer shipments: 12, 17, 18, 19, 19A, 29, 30, 35, 36, 72, 73, 77, 113

Issues

On January 22, 2019, MDEQ issued a Notice of Violation to MSC and the demolition and abatement contractors 21st Centruy Salvage and Next Generation Environmental. During this time ETC collected more than 400 asbestos air samples at the site. None of the sample results exceeded the regulatory limits. The NOV has been resolved and additional steps will be taken to handle the galbestos panels as friable material.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

- CACO - State of Michigan Corrective Action Consent Order
- CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act, known also as Superfund
- NPL - National Priorities List
- PCBs - Polychlorinated biphenyls (a group of manmade chemicals)

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.