

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #3  
Situational Report (SitRep)  
MCCLOUTH STEEL  
A557\_01  
Trenton, MI  
Latitude: 42.1699480 Longitude: -83.1696370

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**From:** Brian Kelly, OSC

**Date:** 6/3/2019

**Reporting Period:**

1. Introduction

1.1 Background

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

## 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/MS C.

On August 6, 2018, Crown/MS C entered into a Settlement Agreement with EPA, MDEQ (now EGLE), and DOJ. The settlement will foster redevelopment by allowing MS C to clarify its cleanup responsibilities while EPA investigates and later fully addresses existing contamination within the property. The steps to be taken by MS C 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.

On May 13, 2019, the southern portion was listed on the Superfund National Priorities List (NPL).

The northern portion will be addressed under a Corrective Action Consent Order between EGLE 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](http://www.epa.gov/superfund/mclouth-steel)

## 2. Current Activities

### 2.1 Operations Section

#### Narrative

In December 2018, EPA approved plans submitted by MS C 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

During the weeks of March 25 and April 8, 2019, EPA and EGLE met with community members to discuss a Community Involvement Plan (CIP). A draft CIP should be available this summer.

#### Surface Water Control

A berm has been installed along the riverfront to prevent surface water run-off to the river.

#### Cumulative Disposal and/or Reuse

- Friable ACM = 1,930 Yards
- Galbestos Siding = 604.44 Tons
- Const. & Demo Debris = 5,596.52 Tons
- PCB Transformers = 171.6 Tons (41 transformers)
- Liquid Waste = 540,053 Gallons
- Freon/Refrigerant units = 64 units drained, refrigerant recycled
- K061 Hazardous Waste = 8 Vac/roll-off boxes
- K062 Liquid waste= 38,935 Gallons
- K062 Solid Waste= 20 Cubic Yards

#### Work Progress Update

- a) Area 4A – No.3 Finishing and Shipping area galbestos and demolition of building complete – 100%
- b) Area 4A – Removal of 3 overhead cranes – 100%
- c) Area 4A – Shearing steel and loading for salvage
- d) Area 4A – No. 3 Finishing and Shipping area –ACM abatement complete – 100%
- e) Area 4A – Transformer dismantling in preparation for shipping
- f) Area 4A – B21 (Switch Gear Basement) pump out of 112,365 gallons of oil and water, taken off-site for disposal
- g) Area 4B – B7-B10 machinery over pits removed and scrapped
- h) Area 4B – B7-B10 Oil pits pressure washing began
- i) Area 4B – Removed 37,585 gallons of pickle liquor from Pickle Line vats and neutralize interior in preparation for demolition
- j) Area 4B – Vacuum liquids from Pickle Liquor distribution piping
- k) Area 4C – Staging and distributing millings on floor as dust control and housekeeping
- l) Area 4C – Abate glove-bagged piping from eastside exterior of Mill Building
- m) Area 4C – Break concrete in B35 began
- n) Area 4C – Weld Shop – removal of non-PCB capacitors complete
- o) Area 4C – B35 (Heater Equipment Pit) 17,133 gallons of liquid taken off-site for disposal
- p) Area 5 – Universal waste cleanup completed

- q) Area 5 – Demolition of Laboratory building – 60%
- r) Area 6 – Machine Shop remove overhead crane and shear for salvage complete
- s) Area 6 – Machine Shop demolition complete
- t) Area 6 – REC 2-24 Machine Shop Sumps 500 gallons of liquid removed and sumps backfilled
- u) Area 7 – WMU 44 (Fuel Oil Storage Tank) Removed 183,400 gallons of liquid and shipped off-site for disposal
- v) Area 7 – WMU 44 (Fuel Oil Tank) vacuuming sludge into boxes for off-site disposal
- w) Area 7 – Cooling Tower abatement of transite and demolition complete – 100%, debris cleanup required
- x) Area 7 – Galbestos abatement and outbuilding demolition complete – 100%
- y) Area 8 – Sinter Block Building demolition complete
- z) Area 8 – Bag House demolition complete – 100%
- aa) Area 9 – Pipe rack abatement and demolition complete – 100%
- bb) Area 9 – Crushing concrete and removing rebar for sampling
- cc) Area 10 – Crush concrete and remove re-bar, stockpile inert material
- dd) Area 11 – Removed 43,742 gallons of oil and water from 2 ASTs
- ee) Area 11 – Asbestos abatement, cleaning, and removal of fuel tanks in preparation for demolition complete
- ff) Area 11 – Demolition of 2 ASTs continues
- gg) Area 11- AOC 63 clean secondary containment complete – 100%
- hh) Area 12 – Brick building demolition began – 60%
- ii) Area 13 – Preparation of area around stoves
- jj) Area 14 – Grubbing trees and mowing
- kk) Area 15 – Grubbing trees and mowing
- ll) Area 16 – Crushing concrete to remove rebar in preparation for sampling
- mm) Area 17 – Galbestos abatement, building demolition, and debris cleanup – 100%
- nn) Area 17 – Sinter Block building demolition – 100%
- oo) Area 18 – Railroad Transfer demolition debris cleanup complete – 100%
- pp) Area 20 – Demolition of 5 Pickle Liquor tanks inside secondary containment complete – 100%
- qq) Area 20 – Labor Building historic mercury release remediation complete – 100%
- rr) Area 20 – Labor Building demolition complete – 100%
- ss) Area 22– Building A, B, and C demolition complete – 100%
- tt) Area 22 – WMU 2 removed 5,945 gallons of oil from AST and taken off-site for disposal
- uu) Area 22 – WMU 2 clean AST in preparation for demolition complete
- vv) Refrigerant removed from 8 air conditioners and taken off-site for recycling
- ww) ITC placed anchors, guy wires, and removed high tension lines from the Mill Building
- xx) Air Monitoring and Asbestos Sampling Summary reports provided to EPA and EGLE on May 1
- yy) Step-down and Large Transformers scheduled for shipping

#### **ANALYTICAL DATA RECEIVED**

##### **Air Monitoring**

- o Air Monitoring Reports for March and April are available on the website.
- o During this period there were no exceedances for asbestos or manganese.
- o Particulate monitoring exceeded the perimeter action level. Particulates levels were generally higher in the morning and at night when there was no site activities. Upwind (off-site) sources are also contributing to elevated dust. Of note, on March 20 and 21, haul trucks distributing inert material (asphalt millings) for berm construction may have caused elevated particulates. On April 5, elevated workzone particulates levels required the application of additional water.

##### **Waste Characterization Analyses**

- o WMU 1 (Sedimentation Basin)
- o WMU 2 (Oil Processing Tank)
- o WMU 23 (BOF Gas Cleaning Pit)
- o WMU 30 – (North Motor Room Basement)
- o WMU 32 – (North Motor Room Equipment Pit)
- o WMU 42 – (Concast Scale Pit)
- o WMU 44 – (Fuel Oil Storage Tank)
- o WMU 57 – (Heater Area Drains Sump)
- o AOC 60b – (South Motor Room Basement)
- o B6 – (Pickle Pit 1 and Tunnel)
- o B28 – (Coil Transfer Pits and Tunnels 2)
- o REC 2-8 – (Coil Transfer Pits and Tunnels)
- o REC 2-27(A8) – (Continuous Casting Basement and Tunnels)

##### **Other Activities**

- April 9, Michigan OSHA completed a courtesy health and safety audit.
- April 24, Congresswoman Debbie Dingell and other municipal officials were on site for a progress update.
- May 13, EPA Regional Administrator Kathy Stepp was on site for a progress update, followed by a press conference at Trenton City Hall announcing the listing of the southern portion of the site on the NPL.

## **2.2 Planning Section**

### **Planned Work**

- a) Area 4A – Asbestos abatement of pipe insulation
- b) Area 4B – B6 pit cleaning and backfill
- c) Area 4B – B7 – B10 pit cleaning to be complete
- d) Area 4B – Jet piping from Pickle Line to the Acid Neutralization Plant scheduled
- e) Area 4C – Pipe rack ACM abatement to be completed
- f) Area 4C – Galbestos abatement begins
- g) Area 5 – Galbestos abatement and building demolition to be completed
- h) Area 6 – Wash House #3 demolition to be completed
- i) Area 7 – Cooling Tower demolition debris cleanup
- j) Area 9 – Concrete pillar demolition to be completed
- k) Area 11 – Demolition of 2 ASTs to be completed
- l) Area 12 – Demolition of brick building scheduled for completion
- m) Area 13 – Preparation of area for scaffolding
- n) Area 16 – Lime Storage Bin demolition to be completed
- o) Transformers scheduled to be shipped off-site for demolition
- p) Static water level measuring scheduled
- q) Sampling in various locations

**Issues**

None

**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

EGLE - Environment, Great Lakes & Energy - State of Michigan

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.