

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #4
MCLOUTH STEEL
A557_01
Trenton, MI
Latitude: 42.1699480 Longitude: -83.1696370

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From: Brian Kelly, OSC

Date: 7/2/2019

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: | 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 about 273 acres and operated from around 1950 until 1995. In 1995, McLouth filed for bankruptcy. In 1996, the McLouth bankruptcy estate sold the McLouth facility to Hamlin Holdings, Inc., which transferred title to Detroit Steel Co. Ltd., or DSC. DSC tried without success to restart steel operations. In 2000, DSC sold the 76-acre northern portion of the facility to Crown Enterprises, Inc. who then transferred title to Riverview-Trenton Railroad Company (or RTRR). EGLE is overseeing the investigation and cleanup of the northern portion of the site.

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. Crown transferred title to MSC Land Company, LLC. The remaining 14 approximate acres are owned by DSC.

Under the terms of the Purchase Agreement between Wayne County and MSC, MSC is required to invest \$20,000,000 in two phases to demolish structures and construct an industrial development. The Purchase Agreement says under no circumstance will the development include the storage or processing of petroleum coke.

Under a separate agreement called an Administrative Settlement Agreement and Covenant Not to Sue (Settlement Agreement) between MSC and EPA, EGLE, and the U.S. Department of Justice, MSC and Crown, parties not responsible for contamination on the property (non-labile parties) received covenants not to sue. To secure the covenants, the Settlement Agreement requires MSC to do the following work in the southern portion of the site:

- Demolish about 45 structures,
- Remove asbestos-containing material, wastes, and PCBs, from all structures before demolition,
- Install a fence around the property,
- Remove water and sludges from 23 subsurface structures,
- Investigate five areas where PCBs may have been released, and
- Assess and report on options for stormwater management to eliminate uncontrolled flow to the Detroit River.

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

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 MSC 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 To-Date

- Aug. 2018- Two fact sheets explaining the settlement agreement were sent to local municipal buildings
- Aug. 8, 2018 - EPA attended the Trenton Council Meeting to explain the cleanup
- Aug. 14 to Sept. 13, 2018- Public comment period was open on the proposed settlement for the site
- Aug. 14, 2018 - Notice of the comment period and public meeting was published in the Federal Register
- Aug. 19, 2018 - Advertisement placed in the NewsHerald announcing public meeting/comment period
- Aug. 20, 2018 - Factsheets delivered to municipal buildings & libraries in Riverview, Trenton, and Grosse Ile
- Aug. 27, 2018 – EPA met with Trenton Visionaries at Trenton City Hall
- Sept. 5, 2018 - Public meeting regarding the proposed settlement. Transcript available on the website
- Sept. 10, 2018 – EPA attended the Grosse Ile Township Board Meeting and answer community questions
- Sept. 19, 2018 – EPA hosted a meeting with the Grosse Ile Civic Association
- Sept. 26, 2018 - EPA hosted a meeting with MSC, Trenton Visionaries, and Friends of the Detroit River
- Sept. 2018 - Postcards distributed to public locations explaining where to get information about the site
- Feb. 7, 2019 – EPA arranged for a site tour with MSC, Friends of the Detroit River, and Trenton Visionaries
- March 3, 2019 - Advertisement was placed in the NewsHerald announcing community interviews
- March 25 to 27 and April 9 to 11, 2019 - EPA community interviews at Trenton Veterans Memorial Library
- April 3, 2019 - EPA sent email update #1 on-site activities
- May 1, 2019 - EPA sent email update #2 on-site activities
- May 5, 2019 – EPA attended the Riverview City Council Meeting to explain the cleanup process
- May 13, 2019 – EPA held a press conference at Trenton City Hall announcing the NPL
- June 3, 2019 - EPA sent email update #3 on-site activities
- June 10, 2019 – EPA hosted a meeting with Trenton Visionaries to discuss NPL listing

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 = 2,180 Yards (58 Truck Loads)
- Galbestos Siding = 900.70 Tons (1,801,400 lbs)
- Const. & Demo Debris = 7,714.65 Tons (15,429,300 lbs)

- PCB Transformers = 171.6 Tons (41 transformers) (343,200 lbs)
- 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

- Area 2 – Building cleaning in preparation for demolition complete – 100%
- Area 4A – Abatement of overhead piping above pickle line complete – 80%
- Area 4A – Shearing steel and loading for salvage
- Area 4A – Galbestos removal at southeast corner complete – 100%
- Area 4A – #3 Finishing and Shipping area – asbestos abatement complete – 100%
- Area 4B – Removal of pickle liquor from Pickle Line vats – 27,750 gallons
- Area 4B - Neutralized interior of Pickle Line vats in preparation for demolition
- Area 4B – Pickle Line process piping and mixing tanks emptied, neutralized, and removed off site for disposal
- Area 4B – Jet piping from Pickle Line to the Acid Neutralization Plant complete – 100%
- Area 4C – Staging and distributing millings on floor for dust control and housekeeping
- Area 4C – Removal piping from eastside exterior of Mill Building complete – 100%
- Area 4C – Cinder block building demolition complete – 100%
- Area 4C – Abatement of interior fuel oil piping complete – 100%
- Area 4C –Concrete crushing and scrap steel load out
- Area 4C – Cleaning of interior overhead fuel oil piping complete – 100%
- Area 4C – B35 (Heater Equipment Pit) – Removed 29,762 gallons of liquids
- Area 5 – Demolition of Washhouse and Laboratory building – 100%
- Area 6 – Machine Shop demolition complete – 100%
- Area 7 – Cooling Tower abatement of transite complete – 100%
- Area 7 – Cooling Tower secondary containment demolition and debris clean-up complete – 100%
- Area 9 – Crushing concrete to remove rebar in preparation of sampling
- Area 11 – AOC 63 –removed oily water and cleaned 2 ASTs - 14,770 gallons
- Area 11 – AOC 63 Cleaning and demolition of concrete secondary containment complete – 100%
- Area 12 – Abatement of roofing tar complete – 100%
- Area 13 – Area preparation for stove demolition began – 5%
- Area 14 – WMU 11 – CWWTP Acid Dosing Tanks- Emptied of liquid and cleaned AST – 3,000 gallons
- Area 17 – Galbestos removal, building demolition, and debris cleanup – 85%
- Area 17 – WMU 23 (BOF Gas Sludge Pit) – Trench cleaning began – 50%
- Area 20 – PACM floor tile abatement complete – 100%
- Area 20 – Remove spent pickle liquor from 5 ASTs – 11,160 gallons
- Area 20 – Demolition of 5 ASTs complete – 100%
- Area 20 – Secondary containment cleaning completed – 100%
- Area 22 – WMU 2 (Oil Processing Tank) Oily water and sludge removed, interior of AST cleaned in preparation for demolition complete - 5,945 gallons
- Replaced storm water catch basin filters
- Transformer 59 – South Motor Room shipped off-site for disposal

ANALYTICAL DATA RECEIVED

Air Monitoring

- o Asbestos Air Monitoring, no exceedance
- o Perimeter Dust Monitoring exceeded the NAAQS PM-2.5 on May 29th
- o Perimeter Dust Monitoring was increased to two weeks starting on May 30th
- o Frequency of road wetting and spraying of demolition materials was increased. On site speed limit reduced
- o Workzone Dust Monitoring, no exceedance
- o Manganese Sampling, no exceedance

Waste Characterization Analyses

- o REC 2-27(A-8) – (Continuous Casting Basement and Tunnels)
- o AOC 60A (South Motor Room)
- o AOC-39(Locomotive Repair Shop)
- o B-11 (Rolling Mill Pit #3)
- o B-25 (Motor Room Pit #2)
- o B30 (North Motor Room Basement)
- o B32 (North Motor Room Pit)
- o B-34 (Turntable Equipment Pit)
- o B-39 (Reheat Furnace Pit 2)
- o REC 4-2 (Subsurface Storage Vaults)
- o WMU-1 –(Sedimentation Basin)
- o WMU-15 (Waste Water Treatment Plant)
- o WMU-23 (Former BOF Gas Cleaning Sludge Pit)
- o WMU-42 (Concast Scale Pit)
- o WMU-43 (Concast Grit Basin)
- o WMU-49 (Downcoiler Sump)
- o WMU-51(Six Stand Basement Sumps)
- o WMU-52 (Finish Stand Scale Pit)
- o WMU-53 (Roughing Mill Scale Pit)
- o WMU-55 (Blooming Mill Scale Pit)
- o WMU-56 (Reheat Sump)
- o WMU-57 (Heater Area Drains Sump)

Other Activities

- EPA's Technical Review Workgroup for Metals and Asbestos to reviewed ETC's Proposed Oven Removal Process.
- EGLE Air Quality Division was on site May 16.
- DTE was on site with ground penetrating radar to find a leak in a 14" HDPE pipeline that runs parallel to Jefferson Avenue through an easement on MSC's property.

2.2 Planning Section

Planned Work

- Area 4A – Asbestos abatement of pipe insulation
- Area 4B – B6 pit cleaning and backfill
- Area 4B – B7 – B10 pit cleaning to be complete
- Area 4C – Galbestos abatement begins
- Area 6 – Wash House #3 demolition to be completed
- Area 12 – Demolition of brick building scheduled for completion
- Area 13 – Preparation of area in preparation for abatement and demolition
- Area 16 – Lime Storage Bin demolition to be completed
- 2 loads of transformers scheduled to be shipped off-site for demolition
- Sampling in various locations will continue

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.