

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #10  
MCLOUTH STEEL  
A557\_01  
Trenton, MI  
Latitude: 42.1699480 Longitude: -83.1696370

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**From:** Brian Kelly, OSC

**Date:** 1/3/2020

**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>	6/5/2018
<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>	MID017422304	<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 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). The Michigan Department of Environment, Great Lakes, and Energy (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](http://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. Settlement work is expected to be completed in 2020.

NPL work is expected to continue through 2033.

#### Community

A community advisory meeting was held on November 14. The next meeting is scheduled for January 23, 2020.

#### Surface Water Control

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

#### Disposal and/or Reuse

Type of Waste	Monthly Total	Cumulative
Friable ACM:	0 Yards (0 Truck Load)	2,420 Yards (66 Truck Loads)
Galbestos Siding:	64.64 Tons	3,049.57 Tons
Const. & Demo Debris:	763.96 Tons	12,690.15 Tons
PCB Transformers:	38.78 Tons (14 Transformers)	466.8 Tons (85 Transformers)
Liquid Waste:	69,635 Gallons	2,775,426 Gallons
Freon/Refrigerant Units:	Waste Removal Complete	70 units drained, recycled
K061 Liquid Waste	Waste Removal Complete	30,980 gallons
K061 Hazardous Waste:	Waste Removal Complete	8 Vac/roll-off Boxes
K062 Liquid Waste:	Waste Removal Complete	101,539 Gallons
K062 Solid Waste:	Waste Removal Complete	50 Cubic Yards

#### Work Progress Update

- Area 3 – Demolition of Wash House Building - 100% complete
- Area 4A – Galbestos removal from mill building
- Area 4A –AOC60(b) (South Motor Room Basement) - Removal of liquids from SMRB for treatment
- Area 4A – WMU 51 (Six Stand Oil Basement Sumps) - Cutting of equipment
- Area 4C – Drained non-PCB oil from high voltage insulators – 100% complete
- Area 4C – Mezzanine – removal of transformers and preparing for off-site disposal – 50%
- Area 13 – Stove #4 brought to ground – 100% complete
- Area 13 – Stove abatement – Ongoing
- Area 14 – Blue Clarifier – Opening created in side of tank to accommodate cleaning
- Area 17 – WMU 23 (Former BOF Gas Cleaning Sludge Pit) - Breaking above grade concrete around pits/trenches
- Area 18 – Demolition of pump house building, and breaking down knee wall – 100% complete
- Area 18 – WMU 25 – Liquids removed and transported offsite for disposal, backfill pit – 100% complete
- Area 22 - WMU 6 – Liquids removed and transported offsite for disposal, backfill pits, demolition – 100% complete
- Area 23 – WMU 1 (Sedimentation Basin) – Backfilling of basin with inert material – 50% complete
- Area 25 – A8 (Concast Tunnels) - Removal of liquids and transported off-site for disposal – 100% complete

- Area 25 – WMU 42 – Break concrete knee wall and backfill – 100% complete
- Slag piles B49, B50, and B67 used as backfill – 100% complete

#### **ANALYTICAL DATA RECEIVED**

- Air Monitoring –
  - Perimeter dust monitoring was performed on November 5th, 14th, 20th, and 26th, 2019 - No Exceedances
  - Workzone real-time dust monitoring was conducted Nov. 1st – Nov. 30th, 2019 - No Exceedances
  - Manganese (Mn) Sampling occurred on Nov. 5th, 14th, 20th, and 26th, 2019 - No Exceedances

#### **Waste Characterization Analyses**

- AOC60(b) - (South Motor Room Basement)
- WMU-15 (Blue Clarifier)
- Mezzanine Transformers

#### **Other Activities**

None

## **2.2 Planning Section**

#### **Planned Work**

- Area 4A – AOC60(b) (South Motor Room Basement) - Liquids removed for treatment, and skimming oil from surface
- Area 4A – WMU 51- Cutting of equipment
- Area 4C – Galbestos removal from mill building
- Area 4C – Preparing transformers for off-site disposal
- Area 7 – Breaking basement roof from electric control room and backfill
- Area 7 – WMU 44 (Fuel Oil Storage Tank) - Backfill to grade with inert material
- Area 12 – Debris cleanup and preparation for covering with inert material
- Area 13 – Continuing of material abatement of Stoves #4 & #5
- Area 23 – WMU1 (Sedimentation Basin) – Continuation of backfilling of basin
- Equipment Maintenance

#### **Issues**

On November 6, 2019, visible emissions were documented by EGLE staff which resulted in a notice of violation (NOV) being issued on November 25. The NOV states, "Visible emissions were observed during the demolition of stove which was demolished as asbestos containing." Demolition of the stoves is suspended until the NOV is resolved.

## **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**

ACM - Asbestos Containing Material  
 ATSDR -Agency for Toxic Substances and Disease Registry  
 CACO - State of Michigan Corrective Action Consent Order  
 CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act, known also as Superfund  
 CIP - Community Involvement Plan  
 EGLE - Environment, Great Lakes & Energy - State of Michigan  
 K061 - Listed Waste: emission control dust  
 K062 - Listed Waste: spent pickle liquor  
 mg/m3 - Milligram per cubic meter  
 MRL - Minimum Risk Level  
 NAAQS - National Ambient Air Quality Standards  
 NPL - National Priorities List  
 PCBs - Polychlorinated biphenyls (a group of manmade chemicals)  
 PM2.5 - Particulate matter 2.5 micrometers or less in diameter  
 PM10 - Particulate matter 10 micrometers or less in diameter  
 POLREP - Pollution Report  
 SitRep - Situation Report  
 TPM - Total Particulate Matter  
 ug/m3 - Micrograms per cubic meter  
 WMU - Waste Management Unit

## **6. Additional sources of information**

No information available at this time.

## **7. Situational Reference Materials**

No information available at this time.