

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #5
MCLOUTH STEEL
A557_01
Trenton, MI
Latitude: 42.1699480 Longitude: -83.1696370

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From: Brian Kelly, OSC

Date: 8/5/2019

Reporting Period:

1. Introduction

1.1 Background

Site Number:	A557_01	Contract Number:	
D.O. Number:		Action Memo Date:	6/5/2018
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:	MID017422304	RCRIS ID:	
ERNS No.:		State Notification:	YES
FPN#:		Reimbursable Account #:	

Incident Category

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-liable 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 Update

June 17, MSC provided a tour of the site to community members and municipal officials. The CIP is being released for public comment.

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:	90 Yards (3 Truck Loads)	2,270 Yards (61 Truck Loads)
Galbestos Siding:	274.03 Tons	1,176.73 Tons
Const. & Demo Debris:	447.09 Tons	8,077.18 Tons
PCB Transformers:	143.6 Tons (8 Transformers)	315.2 Tons (49 Transformers)
Liquid Waste:	423,137 Gallons	1,416,936 Gallons
Freon/Refrigerant Units:	0 units drained, recycled	64 units drained, recycled
K061 Hazardous Waste:	0 Vac/Roll-off Boxes	8 Vac/roll-off Boxes
K062 Liquid Waste:	3,000 Gallons	41,935 Gallons
K062 Solid Waste:	0 Cubic Yards	20 Cubic Yards

Work Progress Update

ACTIONS PERFORMED

- Area 1 – Main Office Building – Cleared of office furniture and drawings
- Area 2 – Visual inspection of Washhouse basement for ACM
- Area 3 – Gas Meter Building – Abatement and clearance complete – 100%
- Area 3 – 2 Frac tanks staged for storage of dust control water
- Area 4A – Liquid removed from pit B6 in preparation of demolition activities and backfill
- Area 4A – Pickle Liquor equipment pits B7-B10 and floor cleaned in preparation of backfill
- Area 4A – Interior brick building demolition completed – 100%
- Area 4A – South Motor Room – Cleaning transformer area, debris consolidated for sampling for suspected PCB
- Area 4A – Abatement of ACM of pipe insulation in the Pickle Line area – 100% complete
- Area 4A – Galbestos abatement and demolition activities began and on going
- Area 4B – Galbestos abatement began and on going
- Area 4B – Cleaning and emptying of interior ceiling pipes complete – 100%
- Area 4C – Cleaning and emptying of interior ceiling pipes complete – 100%
- Area 4C – Concrete crushing, and scrap load-out
- Area 4C – Exterior pipe removal – 100% complete

- Area 4C – Galbestos abatement began
- Area 4C – Asphalt millings delivered and used as inert fill material for pits/sumps
- Area 4C – WMU 56 (Reheat Sump) – Pumping out of liquids – 90,000 gallons
- Area 4C – WMU 57 (Heater Area Drains Sump)– Removal of liquids – 108,350 gallons
- Area 4C – B39 - Heater Demo and backfill – 100%
- Area 4C – Mezzanine – Asbestos abatement – 100% complete
- Area 6 – Crushing of concrete and loading of scrap
- Area 6 – Galbestos abatement and building demolition – 100% complete
- Area 7 – Concrete secondary containment wall demolition began – 25% complete
- Area 7 – WMU 43 (Concast Grit Basin)– Removal of liquids – 208,785 gallons
- Area 7 – WMU 44 (Fuel Oil Tank)– Tank bottoms solidified, taken off-site for disposal – 100% complete (230 tons)
- Area 7 – WMU 44 (Fuel Oil Storage Tank)– Fuel Oil Storage AST demolition – 100% complete
- Area 7 – Cooling Tower – Transite abatement – 100% complete
- Area 9 – Concrete pillar demolition Concrete crushing – 100% complete
- Area 9 – Concrete crushing, magging and loading of scrap
- Area 12 – Transite floor abated and clearance – 100% complete
- Area 12 – Concrete crushing, magging and loading of scrap
- Area 14 – WMU 15 (Wastewater Treatment Plant) – Removed oil from trench
- Area 14 – Removed liquids and lime slurry from AST – 100% complete
- Area 16 – Demolition of lime storage bin – 100% complete
- Area 17- WMU 23 (Former BOF Gas Cleaning Sludge Pit) – Cleaning began – 50% complete
- Area 23 – WMU 1 (Sedimentation Basin) – Removal of liquids – 200,000 gallons
- Transformers #49, 50, & 79 shipped offsite for disposal
- Vehicle and Truck entrances and Office Trailer parking lot cleaned
- Old Fire Extinguishers taken off site for disposal

ANALYTICAL DATA RECEIVED

Air Monitoring

- o Continuous perimeter dust monitoring was performed starting June 3rd – June 12th, 2019.
- o One work day per work week perimeter dust monitoring was performed on June 17th, 2019.
- o Continuous perimeter dust monitoring was performed June 24th – June 30th, 2019.
- o Real-Time Dust Monitoring was conducted June 3 – June 28, 2019 (Mon. – Fri.) with no exceedences.
- o Manganese (Mn) Sampling occurred on June 5th, 11th, 17th, 21st, and 24th – 28th.
 - Sampling analyses for these days revealed no exceedance of the ATSDR MRL action level.

Waste Characterization Analyses

- o B-39 (Reheat Furnace Pit)
- o RECI2- 15II(ReheatIIIBurner Equipment Pits)
- o WMU-1 (Sedimentation Basin)
- o WMU-23A (BOFIIIGas Cleaning Pit)
- o WMU-49II (DowncoilerIIISump)
- o WMU-51m (SixmStandmOil Basement Sumps)
- o WMU-52 (Finish Stand Scale Pit)
- o WMU-53II (RoughingIIIMillIIIScaleIIPit)
- o WMU-55II (BloomingnMillIIIScale Pit)
- o WMU-56 (Reheat Sump)

Other Activities

DTE completed work on the quarry pipeline that runs through an easement on MSC's property.

2.2 Planning Section

Planned Work

- Area 4A – Pickle Line Bay - Galbestos abatement and building demolition
- Area 4A – Shearing iron and separating for scrap
- Area 4A – Lathe Room – demolition scheduled
- Area 4B – WMU 54 (Old Four High Scale Pit) – Removal of liquids scheduled
- Area 4B – WMU 55 (Blooming Mill Scale Pits)– Removal of liquids scheduled
- Area 4C – Asphalt millings to be delivered and used as inert fill material for pits/sumps
- Area 4C - WMU 56 (Reheat Sump) - Cleaning and backfill scheduled
- Area 4C – WMU 57 (Heater Area Drains Sump) – Cleaning and backfill scheduled
- Area 7 – WMU 43 (Concast Grit Basin) – Removal of equipment and liquids for offsite disposal
- Area 7 – WMU 44 (Fuel Oil Storage Tank) – Resume demolition of concrete secondary containment wall
- Area 7 – WMU 44 (Fuel Oil Storage Tank) – Demolition of the AST fuel oil tank scheduled
- Area 12 – Loading re-bar from crushed concrete to be sent off-site for scrap
- Area 15 – Clean-up of demolition debris in preparation for disposal
- Area 16 – Loading concrete and relocating to WMU 1 for use as inert backfill
- Area 23 – WMU 1 (Sedimentation Basin) – Removal of liquids continues
- Area 23 – WMU 1 (Sedimentation Basin) – Sludge sampling and removal scheduled
- Transformers scheduled to ship off-site for disposal

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

ACM - Asbestos Containing Material

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

NPL - National Priorities List

PCBs - Polychlorinated biphenyls (a group of manmade chemicals)

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.