

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #6
MCLOUTH STEEL
A557_01
Trenton, MI
Latitude: 42.1699480 Longitude: -83.1696370

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From: Brian Kelly, OSC
Date: 9/15/2019

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

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

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

The draft Community Involvement Plan was released and is available on EPA's website.

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:	30 Yards (1 Truck Load)	2,300 Yards (62 Truck Loads)
Galbestos Siding:	1,546.16 Tons	2,722.89 Tons
Const. & Demo Debris:	1,719.22 Tons	9,796.40 Tons
PCB Transformers:	0 Tons (0 Transformers)	315.2 Tons (49 Transformers)
Liquid Waste:	406,863 Gallons	1,823,799 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:	2,075 Gallons	44,010 Gallons
K062 Solid Waste:	0 Cubic Yards	20 Cubic Yards

Work Progress Update

- Area 2 – Galbestos abatement completed and cleared – 100%
- Area 4A – Galbestos removal and demolition of Mill building – 15%
- Area 4A - AOC 60A (South Motor Room) –Floor surface cleaning - 75%
- Area 4A – B21 - Removal of equipment and backfilling completed – 100%
- Area 4A – B6 – Removal of liquids complete – 100%
- Area 4A – Cleaning of roll-off used for grease tank removal
- Area 4A – Glove bagging to abate pipe wrapping completed and cleared – 100%
- Area 4A – Lathe Room – Pit cleaned, and backfill complete – 100%
- Area 4A – Pickle Line Bay - Galbestos abatement and building demolition – 40%
- Area 4A – Pickle Line – Demolition of pickle liquor line equipment – 100%
- Area 4A – Removed 3 overhead cranes – 100% • Area 4A – Abatement of transite electrical panels – 100%
- Area 4A - WMU 51 – Equipment removed, liquids removed, and sludge sampled – 75%
- Area 4A – WMU 53 – Removal of liquids for offsite disposal – 100%
- Area 4B – WMU 54 (Old Four High Scale Pit) – Removal of liquids taken off site for disposal – 100%
- Area 4B – WMU 55 (Blooming Mill Scale Pits) – Liquids removed and concrete floor sampled – 100%

- Area 4C – Glove bagging abatement of pipe wrap – 100%
- Area 4C – WMU 56 (Reheat Sump) – Removal of liquids used for on-site dust control – 100%
- Area 4C – WMU 57 (Heater Area Drains Sump) – Removal of water and debris for cleaning – 100%
- Area 7 – WMU 43 (Concast Grit Basin) – Equipment removed, sludges removed, and 2 chambers cleaned – 100%
- Area 7 – WMU 44 (Fuel Oil Storage Tank) – Added absorbent material to tank bottoms, mixed, and loaded out for disposal off site. Backfilling and Demolition and backfill complete – 100%
- Area 9 – Galbestos abatement – 100% • Area 9 - Sampling of oils in transformer – 100%
- Area 12 – Loading re-bar from crushed concrete to be sent off-site for scrap – 100%
- Area 13 – Laying of millings in preparation for stove demolition – 10%
- Area 14 – River Pump House asbestos abatement and transite removal – 75%
- Area 15 –Galbestos removal/cleanup – 80%
- Area 17 – WMU 23 (BOF Gas Sludge Pit)– Removal and disposal of ROB solids, concrete floors sampled – 100%
- Area 23 – WMU 1 (Sedimentation Basin) – Removal of liquids into frac tank for use in water trucks for dust control water
- Area 23 – WMU 1 (Sedimentation Basin)– Oil skimming taken offsite disposal - 50%
- Area 25 – WMU 42 (Concast Scale Pit) – Liquids being used for dust control
- Transformers #48, #51, #52, #53, #54, #55, #58, & #59 shipped offsite for disposal

ANALYTICAL DATA RECEIVED

Air Monitoring

- o Continuous perimeter dust monitoring was performed starting July 1st – July 9th - no exceedences
- o One work day per work week perimeter dust monitoring was performed on July 17th, 23rd, and 30th - no exceedences
- o Real-Time Dust Monitoring was conducted July 1st – July 31st, 2019 (Mon. – Fri.) - no exceedences.
- o Manganese (Mn) Sampling occurred on July 8th, 17th, 23rd, and 30th - no exceedences.

Air Monitoring Issues:

- o July 1 and July 8 (after working hours), Air Monitoring Station 4 had a battery failure.
- o July 3 and July 8, Air Monitoring Station 3 showed negative readings indicating a calibration issue. Data was invalid.
- o July 9, Air Monitoring Station 1 and 3 (after working hours) had battery failures. Workzone dust monitoring showed no exceedences during these dates.

Corrective Actions:

- Increased training on battery charging and calibration.
- MSC will increase the number of days trainees will shadow the primary air monitoring tech.

Waste Characterization Analyses

- Waste Characterization Analyses
 - o AOC-63 (Boiler House Fuel Oil Tanks) Sludge
 - o WMU-1 (Sedimentation Basin)
 - o WMU-23 (Former BOF Gas Cleaning Sludge Pit)
 - o WMU-43 (Concast Grit Basin)
 - o WMU-51 (Six Stand Oil Basement Sumps)
 - o WMU-55 South (Blooming Mill Scale Pits)
 - o WMU-57 (Heater Area Drains Sump)
 - o Transformer 82

Other Activities

None

2.2 Planning Section

Planned Work

- Area 4A – WMU 49 (Downcoiler Sump) – Liquid removal, cleaning, and backfill
- Area 4A – WMU 52 (Finish Stand Scale Pit)– Liquid removal, cleaning, and backfill
- Area 4A – Cleanup of loose pieces galabestos in pit
- Area 4A/C – Loading out of scrap
- Area 4C –Shearing of Iron
- Area 4C – Galbestos Abatement and building demolition
- Area 13 – Preparation of area with asphalt millings
- Area 14 – WMU 15 –Oil Vault - Sampling of sludge, cleaning and backfill
- Area 15 – Breaking concrete, AST demolition, and make safe with barricades
- Area 25 – Isolate concast fingers with asphalt millings
- Site clean-up and house keeping
- Equipment Maintenance
- Drum consolidation and Vac box cleaning

Issues

See air monitoring above.

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)
PM_{2.5} - 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.