

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #8  
MCLOUTH STEEL  
A557\_01  
Trenton, MI  
Latitude: 42.1699480 Longitude: -83.1696370

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**From:** Brian Kelly, OSC

**Date:** 11/6/2019

**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>	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

**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 next year.

NPL work is expected to continue through 2033.

**Community Involvement Update**

Diane Russell is now the lead Community Involvement Coordinator. The Community Involvement Plan is available on EPA's website at [www.epa.gov/superfund/mclouth-steel](http://www.epa.gov/superfund/mclouth-steel) A public tour of the site occurred on October 16. A Community Advisory Group workshop is scheduled for November 14.

**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:	37.18 Tons	2,963.76 Tons
Const. & Demo Debris:	244.12 Tons	11,894.88 Tons
PCB Transformers:	0 Tons (0 Transformers)	315.2 Tons (49 Transformers)
Liquid Waste:	453,686 Gallons	2,607,269 Gallons
Freon/Refrigerant Units:	0 units drained, recycled	70 units drained, recycled
K061 Hazardous Waste:	0 Vac/Roll-off Boxes	8 Vac/roll-off Boxes
K062 Liquid Waste:	57,529 Gallons	101,539 Gallons
K062 Solid Waste:	0 Cubic Yards	30 Cubic Yards

**Work Progress Update**

- Area 2 – Washhouse #2 building demolition completed – 100%
- Area 4A – AOC60(a) – Removal of PCB debris piles - 100%
- Area 4A – AOC60(b) - SMRB liquids off site for disposal
- Area 4A – B19 & B20 Backfilled – 100%
- Area 4A – Demolition and Abatement of Coil Storage Bay – 100%
- Area 4A – No. 1 Finishing and Shipping Bay demolition – 70%
- Area 4A – WMU 51 (Stand Oil Basement Sumps) – preparation for torch cutting and equipment removal – 100%
- Area 4A – WMU 52 – Liquids used for dust control, Sludge removal, cleaned, and backfilled with inert material – 100%
- Area 4A – WMU 53 (Roughing Mill Scale Pit)– liquids for off-site disposal, sludge removal, cleaned, and backfilled – 100%
- Area 4A – WMU 54 (Old Four High Scale Pit) – liquids for off-site disposal, sludge removal, cleaning, and backfilled – 100%
- Area 4B – B32 - Liquid removal for off-site disposal
- Area 4C – Mezzanine – consolidation of miscellaneous waste
- Area 9 – Transformer #82 demolition completed – 100%
- Area 10 – Munching concrete for off-site disposal

- Area 13 – Preparation of area and tipping Stove #1 – 100%
- Area 14 – South Guard Shack universal waste removal
- Area 14 – Turbine abatement – 100%
- Area 14 – WMU 15 (Wastewater Treatment Plant) – Removal of liquids for on-site dust control
- Area 17 – WMU 23 (Former BOF Gas Cleaning Sludge Pit)– Removal of liquids for off-site disposal
- Area 23 – WMU 1 (Sedimentation Basin)– Removal of 30" pipe from basin and sealing to prevent backflow – 100%
- Area 23 - WMU 1 (Sedimentation Basin) – Skimming oil and backfilling of Sedimentation Basin – 50%
- Area 25 – REC 4-15 (A8) - Removal of liquids for dust control – 100%

#### **ANALYTICAL DATA RECEIVED**

##### **Air Monitoring**

- o Perimeter dust monitoring was performed on September 5th, 12th, 19th , and 25th , 2019 - no exceedance.
- o Workzone dust monitoring September 1st – September 30th, 2019 (Mon. – Fri.) - exceedance on September 30th.
- o Manganese (Mn) Sampling occurred on September 5th,12th , 19th , and 25th , 2019 - no exceedance.

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

- o AOC-60A (South Motor Room) Concrete Debris
- o WMU-15 (Wastewater Treatment Plant) Sludge West End
- o WMU-52 (Finish Stand Scale Pit) Sludge
- o WMU-54 (Old Four High Scale Pit)

##### **Other Activities**

None

## **2.2 Planning Section**

##### **Planned Work**

- Area 4A – AOC60(a) (South Motor Room)– Consolidation of debris and removal for offsite disposal
- Area 4A – AOC60(a) (South Motor Room) – Loading out of TSCA waste for offsite disposal
- Area 4A - AOC60(b) (South Motor Room Basement) – Removal of liquids from south end of SMRB into South frac tanks
- Area 4A – AOC60(b) (South Motor Room Basement) - SMRB liquids off site for disposal and re-load frac tanks with liquids
- Area 4A – AOC60(b) (South Motor Room Basement)/B28 – Removal of liquids for offsite disposal
- Area 4A – No. 1 Finishing and Shipping Bay galbestos abatement and demolition
- Area 4B – Breaking knee walls
- Area 4B – Drum consolidation
- Area 4C – Drain mineral oil from Pennsylvania Transformer
- Area 13 – Preparation of Stove #4 and #5
- Area 13 – Stove #1 asbestos abatement cleaning
- Area 13 – Stove #1 demolition clean-up
- Area 14 – WMU 15 (Wastewater Treatment Plant) – Removal of liquids for onsite dust control
- Area 17 – WMU 23 (Former BOF Gas Cleaning Sludge Pit) – cleaning and backfilling
- Area 23 – Skimming oil and backfilling the Sedimentation Basin
- Area 25 – Concast Basement liquids used for dust control

##### **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  
 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.