MONTHLY PROGRESS REPORT 14 – November 2019

- TO: Brian Kelly, U.S. EPA; Dave Kline, EGLE DATE: December 15, 2019
- FROM: Tim Francis, Project Manager, ASTI Environmental
- C.C.: Steven Kaiser, U.S. EPA, Rich Conforti, EGLE, Dennis Schreibeis, MSC Land Company, LLC, Todd Goss, MSC Land Company, LLC, Tom Wackerman, ASTI Environmental

RE: Progress Report (Pursuant to Section VIII, Para. 37 of CERCLA Docket No. V-W-18 C-012 McLouth Steel Facility Trenton, MI)

1. ACTIONS PERFORMED

- 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 (K061 Settling Basin) Liquids removed and transported offsite for disposal, backfill pit – 100% complete
- Area 22 WMU 6 (Acid Neutralization Plant) Liquids removed and transported offsite for disposal, backfill pits, demolition of above ground structures – 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

2. ANALYTICAL DATA RECEIVED

- Air Monitoring
 - One work day per work week perimeter dust monitoring was performed on November 5th, 14th, 20th, and 26th, 2019
 - Additional information and specific details will be provided in a separate report on January 1st, 2020



- Real-Time Dust Monitoring was conducted Nov. 1st Nov. 30th, 2019 (Mon. Fri.).
- Manganese (Mn) Sampling occurred on Nov. 5th, 14th, 20th, and 26th, 2019
 - Sampling analyses for these days revealed no exceedance of the ATSDR MRL action level
- Waste Characterization Analyses
- AOC60(b) (South Motor Room Basement)

o Mezzanine Transformers

• WMU-15 (Blue Clarifier)

3. SCHEDULE FOR COMING MONTH

- 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

4. ANTICIPATED PROBLEMS

 Violation Notice issued by EGLE Air Quality Division (AQD) on Nov. 25, 2019 related to visible emissions released during the tipping of Stove #4 on Nov. 6, 2019. EGLE AQD cited NESHAP, 40 CFR 61.150(a)(1)(ii) as the section of the regulation that was violated.

5. PLANNED RESOLUTION TO EXISTING/ANTICIPATED PROBLEMS

Formal written response to the Violation Notice is due on, or before, Dec. 16, 2019

6. OBSERVATIONS

• None to report at this time

7. DEVIATION FROM WORK PLAN

• None to report at this time

Please let me know if you have any questions related to this report.

Thank you,

Timothy A. Francis

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