

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #14
MCLOUTH STEEL
A557_01
Trenton, MI
Latitude: 42.1699480 Longitude: -83.1696370

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From: Brian Kelly, OSC

Date: 5/12/2020

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. DSC owns the remaining 14 acres.

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-liaible 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. Settlement work is expected to be completed in 2020.

NPL work is expected to continue through 2033.

Community Involvement

The Community Advisory Group (CAG) met on April 9, 2020. The next meeting is scheduled for May 14, 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)	2,450 Yards (67 Truck Loads)
Galbestos Siding:	0 Tons	3,519.0 Tons
Const. & Demo Debris:	1,108.86 Tons	18,171.11 Tons
PCB Transformers:	0 Tons (0 Transformers)	466.8 Tons (85 Transformers)
Liquid Waste:	0 Gallons	2,790,881 Gallons
Freon/Refrigerant Units:	Waste Removal Complete	70 units drained, recycled
K061 Liquid Waste	Waste Removal Complete	32,956 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
Non-Haz Solids	0 Yards	851.67 Yards

Work Progress Update

- Area 1 – Cleanout warehouse in preparation for building demolition
- Area 4A – B24 (Finish Stand Pit #2) - Torch cutting of equipment
- Area 4A – Disassembly and Cleaning of Frac Tanks
- Area 4A – Torch cutting large beams, and scrap loadout for salvage
- Area 4A – Concrete Core Sampling of the South Motor Room Slab
- Area 4B – Abatement of transite building from roof completed and clearance received – 100%
- Area 4C – Concrete Core Sampling of the Mezzanine Subfloor
- Area 4C– Sheering of steel and scrap loadout for salvage
- Area 4C – Demolition and debris clean-up of Mill Building
- Area 14 – Eastern concrete clarifier cage and equipment removed in preparation for cleaning
- Area 14 – Blue Clarifier demolition in preparation for cleaning
- Equipment Maintenance

ANALYTICAL DATA RECEIVED

- Air Monitoring –
 - o One workday per workweek perimeter dust monitoring was performed on March 4, and 13 - No exceedances
 - o Real-Time Dust Monitoring was conducted March. 1 – March 13 - No exceedances
 - o Manganese (Mn) Sampling occurred on March 4 and 13 - No exceedances

Waste Characterization Analyses

N/A

Other Activities

None

2.2 Planning Section

Planned Work

- Area 4A – Cleaning of Frac Tanks
- Area 4A – AOC 60B (South Motor Room Basement) Water removal and treatment
- Area 4A – AOC 60B (South Motor Room Basement) Asbestos survey
- Area 4C – Torch cutting large beams for salvage
- Equipment Maintenance
- Concrete sampling of piles for potential use as inert fill material
- Load out of scrap steel for salvage
- Site wide cleanup of areas previously completed or near completion

Issues

On March 13, 2020, contractors employed by MSC Land Company demolished a large structure located at the Site. This work was observed by an oversight contractor employed by the EPA. The demolition work created a large plume of black dust, which had the potential to travel beyond the perimeter of the Site. EPA notified MSC, who immediately suspended demolition work. On March 18, 2020, EPA formally notified MSC that changes to the Dust Control Plan were required.

On March 27, 2020, a revised Dust Control Plan was approved by EPA that included the following modifications:

- Dust monitoring will be conducted each workday during Mill Building demolition,
- Mill Building demolition will not proceed at wind speeds greater than 10 MPH.

Site work is currently limited.

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.