

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #16  
MCLOUTH STEEL  
A557\_01  
Trenton, MI  
Latitude: 42.1699480 Longitude: -83.1696370

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Cara Clemente, Michigan State Representative  
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USCG PolRep Distribution, USCG

**From:** Brian Kelly, OSC

**Date:** 7/6/2020

**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**

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-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 in 2020.

NPL work is expected to continue through 2033.

**Community Involvement**

The Community Advisory Group (CAG) met on June 11, 2020. The next meeting is scheduled for July 9, 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:	60 Yards (2 Truck Load)	2,510 Yards (69 Truck Loads)
Galbestos Siding:	326.9 Tons	3,845.9 Tons
Const. & Demo Debris:	2,015.42 Tons	20,816.27 Tons
PCB Transformers:	0 Tons (0 Transformers)	466.8 Tons (85 Transformers)
Liquid Waste:	19,647 Gallons	2,835,309 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	27.2 Yards	878.87 Yards

**Work Progress Update**

- Area 1 – Remove transite from roof of Administration Building – 100%
- Area 1 – Demolition of Administration Building – 100%
- Area 2 – Washhouse #1 – cleaning of concrete slab completed
- Area 3 – Washhouse #3 - cleaning of concrete slab completed
- Area 4A – Backfill B-23 (Slitter Basement Sump) completed – 100%
- Area 4A - cleaning of concrete slab completed
- Area 4A – Torch cutting of rebar
- Area 4B – Abate asbestos from manway of north stack – 100%
- Area 4B – Backfill North Motor Room Basement with asphalt millings – 100%
- Area 4B – Power washing of dust from rafters completed
- Area 4C – Vehicle Mntc. Shop – Cleaning of concrete slab completed
- Area 4C – Washing of underside of the mezzanine completed
- Area 10 – Parts Warehouse - cleaning of concrete slab completed
- Area 12 – cleaning of concrete slab completed
- Area 14 – Concrete Clarifiers - Remove cage and equipment
- Area 14 – WMU15 - Backfilling of Thickener completed – 100%
- Area 14 – backfilling of various below grade structures
- Area 24 – B-15 Ore Conveyor Tunnel – demolition of above grade concrete and torch cutting rebar to grade completed
- Area 26 – Retention Basin – demolition of concrete basin wall complete
- Cleanup and consolidation of like materials across the property
- Equipment maintenance

**ANALYTICAL DATA RECEIVED**

o May 14th, exceedance of NAAQS at location #3, upwind location. No other exceedances

- o Real-Time Dust Monitoring - No exceedances
- o Manganese (Mn) Sampling - No exceedances

#### **Waste Characterization Analyses**

N/A

#### **Other Activities**

None

## **2.2 Planning Section**

### **Planned Work**

- Area 4A – AOC60(b) – South Motor Room Basement – Resume treatment of liquids
- Area 4B – Continuation of demolition of Mill Building
- Area 4C – Continuation of demolition of Mill Building
- Area 14 – Continuation of backfilling Concrete Clarifiers
- Area 14 – Demolition of white corrugated building
- Area 14 – Remove sludge from Blue Clarifier
- Area 14 – Remove pumps, motors, and other equipment from River Pump House
- Cleanup and consolidation of like materials across the property
- Equipment maintenance

### **Issues**

Air monitoring batteries continue to experience power failures during nonworking hours. Corrective action: all batteries have been replaced and additional batteries have been purchased. Batteries are now changed after each monitoring period.

## **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/m<sup>3</sup> - 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<sub>2.5</sub> - Particulate matter 2.5 micrometers or less in diameter  
PM<sub>10</sub> - Particulate matter 10 micrometers or less in diameter  
POLREP - Pollution Report  
SitRep - Situation Report  
TPM - Total Particulate Matter  
ug/m<sup>3</sup> - 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.