

US EPA RECORDS CENTER REGION 5



508866

# **DSC McLouth Steel Gibraltar Plant**

## **Gibraltar, Michigan**

---

### Interim Record of Decision



Prepared by  
U.S. Environmental Protection Agency  
Region 5

September 2016

# TABLE OF CONTENTS

---

List of Acronyms and Abbreviations.....	iii
<b>PART I: DECLARATION.....</b>	<b>1</b>
Site Name and Location.....	1
Statement of Basis and Purpose.....	1
Assessment of the Site.....	2
Description of the Selected Remedy.....	2
Statutory Determinations.....	2
ROD Data Certification Checklist.....	3
Support Agency Acceptance.....	3
Authorizing Signature.....	3
<b>PART II: DECISION SUMMARY.....</b>	<b>4</b>
1.0 Site Name, Location, and Description.....	4
2.0 Site History and Enforcement Activities.....	4
3.0 Community Participation.....	6
4.0 Scope and Role of Operable Unit or Response Action.....	7
5.0 Site Characteristics.....	7
6.0 Current and Potential Future Land and Resource Uses.....	9
7.0 Summary of Site Risks.....	9
8.0 Interim Remedial Action Objectives.....	10
9.0 Description of Alternatives.....	10
10.0 Summary of Comparative Analysis of Alternatives.....	11
11.0 Principal Threat Wastes.....	15
12.0 Selected Remedy.....	16
13.0 Statutory Determinations.....	17
14.0 Documentation of Significant Changes.....	19
<b>PART III: RESPONSIVENESS SUMMARY .....</b>	<b>19</b>

## **FIGURES**

Figure 1	Site Location Map
Figure 2	Site Features

## **TABLES**

Table 1	Cost Estimate for Source Control Activities – Alternative 2
Table 2	Federal ARARs
Table 3	Michigan ARARs

## **APPENDICES**

Appendix A	Administrative Record Index
Appendix B	Public Notice of Proposed Plan

## **LIST OF ACRONYMS AND ABBREVIATIONS**

ARARs	Applicable or Relevant and Appropriate Requirements
CERCLA	Comprehensive Environmental, Response, Compensation, and Liability Act
COCs	Contaminants of Concern
CWLF	Countywide Landfill
DSC	Detroit Steel Company
EPA	U.S. Environmental Protection Agency
GLC	Gibraltar Land Company
MDEQ	Michigan Department of Environmental Quality
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
O&M	Operation and Maintenance
PCBs	Polychlorinated Biphenyls
RAOs	Remedial Action Objectives
RCRA	Resource Conservation and Recovery Act
RJ/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
TCRA	Time-Critical Removal Action
TMP	Tandem Mill Pond
UU/UE	Unlimited Use and Unrestricted Exposure

This Interim Record of Decision (ROD) documents the interim remedy selected for the DSC McLouth Steel Gibraltar Plant Superfund site (DSC site) located in Wayne County, Gibraltar, Michigan. The ROD is organized in three sections: Part I contains the *Declaration* for the ROD and Part II contains the *Decision Summary*. The *Responsiveness Summary* is included as Part III.

## **PART I: DECLARATION**

This section summarizes the information presented in the ROD and includes the authorizing signature of the U.S. Environmental Protection Agency (EPA) Region 5 Superfund Division Director.

### SITE NAME AND LOCATION

The DSC site, which is located in Gibraltar, Wayne County, Michigan, was historically operated as a steel finishing operation and includes three landfills and a leachate treatment lagoon system. Landfills A and B are located on the east side of the site and have an associated leachate treatment lagoon system. Countywide Landfill (CWLF) is located on the west side of the site (see Figure 1). CWLF historically accepted steel production waste from McLouth Steel Products (McLouth) in Trenton as well as from on-site McLouth operations in Gibraltar, and later operated as a demolition debris landfill. The site is bounded by West Jefferson Avenue, a National Wildlife Refuge, and residential homes to the east. Vreeland Road, residential homes, commercial property, and undeveloped land are north of the site. Gibraltar Road, residential homes, and a rail spur are to the south. The Canadian National North America rail line and commercial properties are located to the west. The Humbug Marsh, which is part of the Detroit River International Wildlife Refuge, is located adjacent to the site to the east. Two rail lines, Brownstown Creek, and the Frank & Poet Drain bisect the site between CWLF and Landfills A and B. Brownstown Creek drains into the Frank & Poet Drain, and the Frank & Poet Drain eventually runs into the Detroit River. The Trenton Channel of the Detroit River is approximately 1,500 feet east of the site. The CERCLIS ID for the site is MIN000510362.

### STATEMENT OF BASIS AND PURPOSE

This decision document presents the selected interim remedy for the DSC site, which was chosen in accordance with the Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA) of 1980, as amended, 42 U.S.C. § 9601 *et seq.* and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300. This decision is based on the Administrative Record for this site. The Administrative Record Index identifies each of the items comprising the Administrative Record upon which EPA has based the selection of the interim remedial action.

The State of Michigan has indicated its intention to concur with the selected remedy. Upon receipt, the State's concurrence letter will be added to the Administrative Record.

## ASSESSMENT OF THE SITE

The response action selected in this interim ROD is necessary to mitigate the continued migration of contaminants and prevent further environmental degradation from actual or threatened releases of hazardous substances into the environment. Such releases or threat of releases may present an imminent and substantial endangerment to public health, welfare, or the environment.

### DESCRIPTION OF THE SELECTED REMEDY

The selected interim action stabilizes and controls leachate at the ponds associated with Landfills A and B to keep hazardous leachate from overflowing the ponds. The selected interim remedy for the DSC site includes the following interim source control activities:

- Continuation of the pumping that was conducted under the 2015 time-critical removal action (TCRA) and 2016 emergency removal action to stabilize the leachate within the ponds associated with Landfills A and B. EPA estimates that approximately 2 million gallons of leachate are generated each year from the landfills and collected in the ponds. EPA will pump out the leachate from the ponds and send it off site for disposal at a Resource Conservation and Recovery Act (RCRA)-approved facility until a final remedy is selected and implemented that addresses Landfill A and B leachate.

The source control activities selected in this ROD are interim measures to stabilize the leachate. These interim measures will prevent further environmental degradation while EPA continues through the Superfund remedial process and until a final long-term remedial action is selected and implemented that addresses Landfill A and B leachate.

### STATUTORY DETERMINATIONS

This action is intended to provide interim source control measures to stabilize the leachate within the ponds, mitigate the continued migration of contamination, and prevent further environmental degradation from actual or threatened releases of hazardous substances into the environment. This action is a protective interim action that provides adequate steps in the short term to minimize the volume of hazardous leachate released from the site until a final remedy that addresses the leachate is selected and implemented; it complies with those federal and state requirements that are applicable or relevant and appropriate for this limited-scope action; and it is cost-effective.

This action is an interim action only and is not intended to be a permanent solution. The interim action uses treatment technologies to the maximum extent practicable for the limited scope of the action, and also satisfies the statutory preference for treatment, since the hazardous leachate is treated to reduce the pH to non-hazardous levels before being sent to an off-site disposal facility. This action does not constitute the final remedy for the site, and subsequent actions will fully address the remaining threats posed by the

conditions at the site. Because this remedy will result in hazardous substances remaining on-site above health-based levels, a review will be conducted every five years after commencement of the remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment. Because this is an interim ROD, review of this site and remedy will be ongoing as EPA continues to develop remedial alternatives for the site.

### ROD DATA CERTIFICATION CHECKLIST

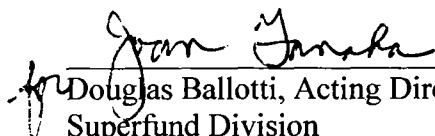
The following information is included in the *Decision Summary* section of this ROD. Additional information can be found in the Administrative Record for this site.

- Contaminants of concern (COCs) and their respective concentrations (Section 5.0).
- Risks presented by the COCs (Section 7.0). A baseline risk assessment was not conducted for this interim action due to the immediate need to take action.
- Cleanup levels established for the COCs and the basis for these levels. Cleanup levels are not appropriate for this interim remedy, which consists of treatment, removal and proper disposal of leachate from the ponds associated with Landfills A and B. The site cleanup levels will be determined in the final selected remedy.
- How source materials constituting principal threats are addressed (Section 11.0).
- Current and reasonably anticipated future land use assumptions (Section 6.0).
- Potential land and groundwater use that will be available at the site as a result of the Selected Remedy. As a result of the selected interim remedy there will not be any change from current land use, and groundwater is not addressed by this interim action. However, Section 6.0 describes the current and reasonably anticipated future land uses.
- Estimated capital, annual operation and maintenance (O&M), and total present worth costs, discount rate, and the number of years over which the remedy cost estimates are projected (Section 12.0).
- Key factors that led to selecting this interim remedy (Sections 10.0 and 12.0).

### SUPPORT AGENCY ACCEPTANCE

The State of Michigan has indicated that it will concur with the selected interim remedy. The State of Michigan's concurrence letter will be added to the Administrative Record upon receipt.

### AUTHORIZING SIGNATURE

  
\_\_\_\_\_  
Douglas Ballotti, Acting Director  
Superfund Division  
U.S. Environmental Protection Agency  
Region 5

9/2/16  
Date

## **PART II: DECISION SUMMARY**

### **1.0 Site Name, Location, and Description**

The DSC site (MIN000510362) is located in Gibraltar, Wayne County, Michigan and historically operated as a steel finishing operation. The site includes three landfills and a leachate treatment lagoon system. Landfills A and B and their associated leachate treatment lagoons are located on the east side of the site. CWLF is located on the west side of the site (see Figure 1). Landfills A and B are closed landfill cells located south of the mill building. The leachate treatment lagoon system associated with Landfills A and B includes a series of 6 basins and ponds and the partially-closed Tandem Mill Pond (TMP).

In March 2015, EPA added the DSC site to the National Priorities List (NPL). EPA is currently in the early stages of a fund-lead remedial investigation/feasibility study (RI/FS). EPA is the lead agency for this site and the Michigan Department of Environmental Quality (MDEQ) is the support agency.

### **2.0 Site History and Enforcement Activities**

McLouth Steel Company owned and operated the property as a steel finishing facility, including annealing, pickling, and cold rolling processes beginning in the early 1950s. In 1996, mill operations ceased when the site was sold to the Detroit Steel Company, Ltd. (DSC). In 2007, forty-two acres of the property, including the former mill building, were sold to Steel Rolling Holdings, Inc. The property now owned by Steel Rolling Holdings, Inc. is not part of the NPL site.

CWLF, located west of the mill on the opposite side of the Frank & Poet Drain, was formerly owned and operated by McLouth Steel Company. CWLF was originally licensed in 1976 under Michigan's original Solid Waste Management Act, 1965 PA 87. It received steel manufacturing wastes from McLouth Steel Products in Trenton as well as from the Gibraltar plant. Material from the Trenton facility was delivered in trucks and dumped in the landfill. This included mill scale, blast furnace dust, filter cake, and grit. The filling operations continued until the mid-1980s when all but a small portion of the quarry was filled. Those areas not filled were noted to contain ponded water. In 1982, a permit was issued for the continued operation of a Type III landfill under the former Solid Waste Management Act, 1978 PA 641. The ponded water areas were reportedly filled with construction debris from re-construction of roadways near the area. In July 1996, the sale of McLouth's assets to Hamlin Holdings, Inc., was approved by the Bankruptcy Court. The closing on the sale took place in August 1996 and title to the Gibraltar facility was transferred to DSC.

Landfills A and B and their associated leachate treatment lagoon system are located south of the mill building. The partially-closed TMP, which is part of the leachate treatment lagoon system, historically received liquid wastes from the McLouth cold mill operation. The TMP served as an oil separation pond, where oily process water from the plant was

acidified, allowing oil to separate from the water. Water from the TMP was then pumped to the lagoons for further processing prior to discharge through an outfall into the Frank & Poet Drain.

### **Site Enforcement Activities**

In December 1997, the Wayne County Circuit Court entered a Consent Judgment between the Gibraltar Land Company (GLC) and MDEQ. The Consent Judgment addressed violations at CWLF and McLouth Steel Products Corporation. In September 2005, a Solid Waste Disposal Area Operating License was issued to GLC. In June 2007, MDEQ issued a Notice of Violation at CWLF for multiple violations of the Consent Judgment and the Special Conditions in the License. In May 2010, MDEQ issued a Violation Notice and Notice of Intent for License Revocation to GLC summarizing past and ongoing violations that occurred since June 2006.

In June 1999, EPA entered an Administrative Order (Order) with DSC Ltd. for solid waste handling violations. The Order required DSC to stop the exposure of migratory birds to solid wastes at the TMP and to protect wildlife and wildlife habitat from any harmful effects of solid waste. DSC started reducing oil in the TMP and providing wildlife deterrents by using a noise cannon to scare away wildlife. During EPA inspections in September 1999, dead birds were found in the vicinity of the site near the TMP. Oil in the TMP was comprised of process oils including lubricating, hydraulic, rolling, and slushing oils.

In February 2008, GLC notified MDEQ that it could no longer afford to pay to have landfill leachate pumped and hauled to a disposal facility. At that time, MDEQ determined that GLC was unable to fulfill its regulatory obligations and responsibilities to manage or close CWLF. In March 2008, MDEQ was granted access to CWLF for purposes of managing the leachate and overseeing the closure of CWLF.

Responding to a request by MDEQ in 2010, EPA conducted a TCRA at the CWLF. EPA constructed a leachate collection system for the CWLF, filled the eastern and western leachate ponds with stone and covered them with clay, installed a loading pipe with level indicator, leveled and graded the cap, and seeded the exposed areas of CWLF. Three aerators were also added to the leachate treatment lagoon system. The TCRA cost approximately \$2 million. MDEQ is currently pumping and disposing of leachate from the passive collection system at CWLF.

In February 2015, the current site owner, DSC, notified EPA, the State of Michigan, and Wayne County that it had abandoned the property and would not continue treatment and management of the leachate at Landfills A and B and their associated ponds. During and following the 2015 spring thaw, leachate overflowed from the ponds into the Frank and Poet Drain. Leachate also leaked from Landfills A and B into the surrounding area.



In March 2015, EPA listed the site on the NPL based on surface water contamination. Following the site's listing on the NPL, EPA collected leachate and/or surface water samples from CWLF and Landfills A and B. The results are discussed below.

### Countywide Landfill

In April 2015, EPA collected surface water samples from ponds located adjacent to CWLF that historically were utilized to contain leachate discharges and surface water runoff from CWLF. EPA collected additional samples of surface water in October 2015, January 2016, and April 2016, as well as samples from the leachate sump in January and April 2016. The results from these sampling efforts showed no levels of any constituents or hazardous pH that would warrant either another TCRA or an interim remedial action at CWLF. EPA will collect additional samples from CWLF as part of its site-wide RI/FS.

### Landfills A and B

In April 2015, EPA collected samples of leachate from Landfills A and B. Two leachate samples showed pH levels of 12.47 and 12.71. A pH above 12.5 is defined as hazardous by 40 CFR 261.22. On June 10, 2015, EPA signed an Action Memorandum for a TCRA to address the hazardous leachate at Landfills A and B and their associated ponds. The Action Memo called for stabilization of leachate volumes for a period not to exceed one year in order to prevent the outbreak and release of leachate from the ponds. During the TCRA, leachate was drawn down from Vault 1 (Landfill A) and Vault 2 (Landfill B) when the level in the vault was high. The leachate was then pumped through the existing leachate pumps and pipes into the leachate ponds (shown on Figure 2), which contained stormwater. The pH of Pond 1 was monitored so it did not approach 12.5. Leachate was then pumped from Pond 1 into frac tanks for settling. From the frac tanks, leachate was pumped into tanker trucks for disposal. During the 2015 TCRA, EPA removed approximately 4.7 million gallons of leachate from the ponds.

In spring 2016, the ponds associated with Landfills A and B were again nearing their capacity and threatening to overflow their banks. EPA conducted an emergency removal action in March 2016 to again stabilize the leachate volumes. During the emergency removal action, EPA removed approximately 610,000 gallons of leachate from the ponds in the same manner as the 2015 TCRA described above.

## 3.0 Community Participation

The Proposed Plan and other relevant and supporting documents for the DSC site were made available to the public in April 2016. Copies of all the documents supporting the interim remedy outlined in the Proposed Plan and contained in the Administrative Record were made available to the public at the Flat Rock Public Library, where an information repository has been established. (See Appendix A for the Administrative Record Index.) EPA published a notice in the New Herald - Heritage, on April 3, 2016, announcing the release of the Proposed Plan, the availability of the Administrative Record documents, and information regarding the public comment period. (See Appendix B for a copy of the

published notice.) The 30-day public comment period ran from April 4 through May 3, 2016. EPA did not schedule a public meeting but offered to hold one if requested. No one requested a public meeting, and EPA received no comments on the Proposed Plan during the public comment period.

#### 4.0 Scope and Role of Operable Unit or Response Action

EPA is currently in the early stages of a fund-lead RI/FS. As noted in Section 2.0, EPA has conducted three removal actions at the site to date: a 2010 TCRA at CWLF, and a 2015 TCRA and 2016 emergency removal action at the ponds associated with Landfills A and B. This interim action is intended to address the leachate in the ponds associated with Landfills A and B by continuing to pump the leachate and dispose of it off site until such time as EPA selects and implements a final remedy that addresses the leachate. This interim action will neither be inconsistent with nor preclude implementation of the expected final remedy.

#### 5.0 Site Characteristics

This section provides a brief yet comprehensive overview of the site and summarizes the most current information available. Because EPA is currently in the early stages of the RI/FS, the sources of COCs, nature and extent of contamination, potential transport pathways, and environmental receptors are unknown and have not been fully characterized for the site. This information will be provided in and be the focus of the remedial investigation report for the site.

##### 5.1 Physical Characteristics

##### Landfills A and B and Associated Leachate Treatment Lagoon System Ponds and Basins

Landfills A and B are located south and west of the former Gibraltar Plant and the leachate treatment ponds and basins (see Figure 2). The landfills contain steel mill sludge. Landfill A is approximately 23 acres and Landfill B is approximately 32 acres in size. Historic sampling results of the leachate from these landfills shows that the leachate has contained naphthalene, phenol, mercury, 2,4-dimethylphenol, barium, and cyanide.

The leachate treatment lagoon system includes a series of 4 water retention basins and 2 ponds, including the TMP. The TMP is a 6.2-acre oil separation pond located south of the production building. South of the TMP is a 1.1-acre Acid Dosing Pond and a 1.4-acre Sludge Drying Pond. North of the TMP are 4 water retention basins, with sizes of 0.2 acres, 0.9 acres, 1.1 acres, and 1.4 acres. The treatment system consisted of the following processes: solids settling, pH adjustment, ammonia reduction, and aeration. Oily process water from the plant was pumped to the TMP, where it was acidified to allow oil to separate from the water. Water from the TMP was then pumped to lagoons for further processing prior to discharge through an outfall into the Frank & Poet Drain under an expired National Pollution Discharge Elimination System permit. The current system has not been properly maintained and does not reliably meet effluent discharge requirements.

Historic sampling results of the water discharged into the Frank & Poet Drain shows that the water entering the drain has contained phenols, polychlorinated biphenyls (PCBs) and metals, and had a high pH. Oil in the TMP is comprised of process oils including lubricating, hydraulic, rolling, and slushing oils. Dead birds continue to be found in the vicinity of the site, presumably due to the oils found in the TMP.

Sample results from April 2015 show that the leachate from Landfills A and B continues to have a high pH and is characterized as hazardous waste.

### Countywide Landfill

The 93-acre CWLF is located west of the mill and west/northwest of Landfills A and B (see Figure 2). The CWLF contains steel manufacturing waste, including mill scale, blast furnace dust, filter cake, and grit. The landfill had historical ponded-water areas that were reportedly filled with construction debris from re-construction of roadways near the area. The landfill has frequent leachate outbreaks that flow into Brownstown Creek. Historical leachate samples contained carbazole, mercury, silver, PCBs, selenium, vanadium, zinc, cyanide, carbon disulfide, phosphorus, naphthalene, 2,4-dimethylphenol, phenol, and nickel. However, surface water samples and leachate samples collected in 2015 and 2016 showed no constituents that warrant action at this time, and the pH levels also were not hazardous (i.e., the pH was less than 12.5). As a result, this interim ROD does not address CWLF. The CWLF area of the site will be further investigated and addressed during the site-wide RI/FS.

#### 5.1.1 Site Geology

The site stratigraphy consists of fill overlying a lacustrine clay stratum over dolomitic bedrock. The surficial fill varies from 5 to 15 feet. The clay layer is 18 to 35 feet thick. Groundwater was observed at the clay/bedrock interface, and in a shallow perched aquifer above the clay layer. In general, groundwater flows from the north-northeast with an unexplained groundwater depression beneath the CWLF.

#### 5.1.2 Hydrological Conditions

Drinking water for the area is mainly provided by a municipal utility which utilizes surface water outside a four-mile radius of the site. Although the area is serviced through the municipal utility, there are groundwater wells within the four-mile radius. The closest private well is within 2 miles of the site.

### 5.2 Nature and Extent of Contamination

Sources of hazardous substances at the site include the leachate treatment lagoon system ponds and basins, Landfills A and B, and the CWLF. While the CWLF is discussed in this document, the interim remedial action selected in this ROD does not address the CWLF because the most recent samples of surface water/leachate from CWLF, collected in 2015 and 2016, have shown no levels of constituents or pH that warrant action at this

time. However, EPA will continue to monitor leachate from the CWLF during the site-wide RI/FS.

#### 5.2.1 Contaminants of Concern

At present, the known COC is leachate that has an elevated pH exceeding 12.5 in the ponds associated with Landfills A and B. Mill wastes with high phenolic content were placed in these landfills and the containment ponds hold the leachate from these landfills. Leachate with a pH at this level can be very corrosive to skin and mucous membranes.

#### 5.2.2 Source of Contamination

The source of the leachate in the ponds associated with Landfills A and B is from waste materials placed into those two landfills.

#### 5.2.3 Nature and Extent of Contamination

The nature and extent of contamination at the site has not yet been determined, as EPA is in the early stages of an RI/FS. This interim ROD deals only with the ponds associated with Landfills A and B. Leachate from Landfills A and B has been shown to contain naphthalene, phenol, mercury, 2,4-dimethylphenol, barium, and cyanide, and currently has a pH greater than 12.5, classifying it as hazardous. Water from the ponds that discharged into the Frank & Poet Drain has been shown to contain phenols, PCBs, metals, and high pH.

### 6.0 Current and Potential Future Land and Resource Uses

The DSC site is located in a mixed commercial/residential area. It is anticipated that the land usage in the immediate vicinity of the site will remain unchanged for the foreseeable future. Groundwater is outside the scope of this interim remedy and will be discussed and addressed, as needed, in a future decision document.

### 7.0 Summary of Site Risks

Neither a formal RI/FS report nor a human health or ecological risk assessment is available. Ecological and human health risks associated with the site, as well as the ultimate cleanup objectives, will be further evaluated and addressed in a future decision document.

Leachate with a pH above 12.5 is present at Landfills A and B and their associated ponds. This hazardous leachate needs to continue to be stabilized so that outbreaks no longer occur. Liquids with a high pH are corrosive and can cause injury to mucous membranes and tissues either through direct contact, ingestion or inhalation.

## 7.1 Basis for Interim Response Action

The focus of this interim remedial action is to provide interim source control measures to prevent the leachate within the ponds associated with Landfills A and B from overflowing into the surrounding drains. The potential release of contamination from the drains to the environment may present an imminent and substantial endangerment to the public health, welfare, or the environment.

## 8.0 Interim Remedial Action Objectives

Remedial action objectives (RAOs) provide a general description of what the cleanup is expected to accomplish and typically serve as the design basis for the remedial alternatives under consideration.

The high pH in the leachate found at Landfills A and B and the associated ponds can cause a substantial threat to human health and the environment if not kept stabilized. EPA has concluded that source control actions need to be taken to keep the site stabilized, prevent further migration of the contaminants, and prevent further environmental degradation. EPA has therefore identified the following RAO for this interim remedial action:

- Mitigate future leachate outbreaks and stabilize leachate volumes at the ponds associated with Landfills A and B by continuing the pumping of leachate initiated by EPA's 2015 TCRA and 2016 emergency removal action.

This remedy is termed an interim remedial action under CERCLA because EPA has not fully determined the nature and extent of contamination at the site. This interim action is necessary to prevent further leachate from entering into the drains and the environment and preventing further environmental degradation while the site-wide RI/FS is conducted and until EPA selects and implements a final remedy that addresses the leachate.

## 9.0 Description of Alternatives

EPA evaluated only two remedial alternatives for the limited-scope interim remedial action at Landfills A and B and their associated ponds. The two remedial alternatives are listed and described below.

- Alternative 1 – No Action
- Alternative 2 – Source Control of Leachate by Continued Pumping

The two alternatives were evaluated against the nine criteria required by the NCP (see Section 10.0 below.)

### Alternative 1: No Action

Regulations governing the Superfund program require that the “no action” alternative be evaluated to generally establish a baseline for comparison. Under this alternative, EPA would take no further action at the site. With no additional pumping, the hazardous leachate from Landfills A and B would overflow from the ponds – likely during the fall of 2016 – and would enter into the Frank and Poet Drain. This would result in further migration of site contaminants and further environmental degradation.

Estimated Capital Cost: \$0  
Estimated O&M Cost: \$0  
Total Present Value Cost: \$0

### Alternative 2: Source Control of Leachate by Continued Pumping

Under this alternative, the pumping of leachate that was conducted under the 2015 TCRA and 2016 emergency removal action would continue in order to stabilize the leachate within the ponds associated with Landfills A and B. EPA estimates that approximately 2 million gallons of leachate are generated each year from the landfills and collected in the ponds. Under this alternative, EPA would first lower the pH of the leachate to reduce its toxicity to non-hazardous levels by pumping the high-pH leachate through portions of the pond system to blend it with lower-pH liquids. EPA would then pump the leachate from the ponds to settling tanks before shipping the leachate off site for disposal at a RCRA-approved facility. These source control activities would continue as necessary until EPA selects and implements a final remedy that addresses the Landfill A and B leachate.

Estimated Capital Cost: \$0 (no construction necessary)  
Estimated Pumping Cost: \$25,000/month, \$300,000/year  
Estimated Time to Achieve RAO: Immediately upon implementation of the pumping  
Estimated Time to Site-wide ROD: 5 years  
Total Present Value Cost<sup>1</sup>: \$1,316,000

## 10.0 Summary of Comparative Analysis of Alternatives

Section 121(b)(1) of CERCLA presents several factors that EPA is required to consider in its assessment of alternatives. Building upon these specific statutory mandates, the NCP articulates nine evaluation criteria to be used in assessing the individual remedial alternatives. The purpose of this evaluation is to promote consistent identification of the relative advantages and disadvantages of each alternative, thereby guiding selection of remedies offering the most effective and efficient means of achieving site cleanup goals. While all nine criteria are important, they are weighed differently in the decision-making process depending on whether they evaluate protection of human health and the environment or compliance with federal and state requirements, standards, criteria, and limitations (threshold criteria); consider technical or economic merits (primary balancing

---

<sup>1</sup> The total present value cost considers the time value of money and was calculated using a discount rate of 7%.

criteria); or involve the evaluation of non-EPA reviewers that may influence an EPA decision (modifying criteria). Each of these nine criteria are described below.

### **Threshold Criteria**

1. **Overall Protection of Human Health and the Environment** addresses whether a remedy provides adequate protection of human health and the environment and describes how risks posed by the site are eliminated, reduced or controlled through treatment, engineering, or institutional controls.
2. **Compliance with Applicable or Relevant and Appropriate Requirements (ARARs)** addresses whether a remedy will meet the applicable or relevant and appropriate federal and state requirements.

### **Primary Balancing Criteria**

3. **Long-Term Effectiveness and Permanence** refers to expected residual risk and the ability of a remedy to maintain reliable protection of human health and the environment over time, once cleanup levels have been met.
4. **Reduction of Toxicity, Mobility, or Volume Through Treatment** addresses the statutory preference for selecting remedial actions that employ treatment technologies that permanently and significantly reduce toxicity, mobility or volume of the hazardous substances as their principal element. This preference is satisfied when treatment is used to reduce the principal threats at the site through destruction of toxic contaminants, reduction of the total mass of toxic contaminants, irreversible reduction in contaminant mobility, or reduction of total volume of contaminated media.
5. **Short-Term Effectiveness** addresses the period of time needed to implement the remedy and any adverse impacts that may be posed to workers, the community and the environment during construction of the remedy until cleanup levels are achieved. This criterion also considers the effectiveness of mitigative measures and time until protection is achieved through attainment of the remedial action objectives.
6. **Implementability** addresses the technical and administrative feasibility of a remedy from design through construction, including the availability of services and materials needed to implement a particular option and coordination with other governmental entities.
7. **Cost** includes estimated capital costs, annual O&M costs, and net present value of capital and O&M costs, including long-term monitoring.

### **Modifying Criteria**

8. **State Agency Acceptance** considers whether the state support agency concurs with the selected remedy for the site.
9. **Community Acceptance** addresses the public's general response to the remedial alternatives and the preferred alternative presented in the Proposed Plan.

Each of the nine evaluation criteria are discussed below with respect to the alternatives that were considered for this interim action.

## **Comparison of Alternatives**

### **1. Overall Protection of Human Health and the Environment**

It is important to note that neither of the potential remedial alternatives fully reduces the risks to human health and the environment that may already exist due to previous releases of leachate from the ponds associated with Landfills A and B. The objective of this interim action is to stabilize the site, mitigate contaminant migration and prevent further environmental degradation – in other words, to provide protective interim source control measures by preventing the release of leachate from the ponds associated with Landfills A and B.

Alternative 1, the “No Action” alternative, would not provide protective interim source control measures because it would allow the eventual and continued future overflow of hazardous leachate into the environment from Landfills A and B and their associated ponds.

In terms of this interim action, Alternative 2 would provide protective interim source control measures. Alternative 2 would prevent uncontrolled releases of the hazardous leachate from Landfills A and B by continuing the pumping and off-site disposal of the leachate that was conducted during two prior EPA removal actions. This alternative would contribute to the long-term protection of human health and the environment.

### **2. Compliance with ARARs**

Section 121(d) of CERCLA requires that remedial actions at CERCLA sites at least attain legally applicable or relevant and appropriate federal and state requirements, standards, criteria, and limitations which are collectively referred to as “ARARs,” unless such ARARs are waived under CERCLA Section 121(d)(4). Applicable requirements are those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility siting laws that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstances found at a CERCLA site. Relevant and appropriate requirements are those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility siting laws that, while not “applicable” to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstances at a CERCLA site, address problems or situations sufficiently similar to those encountered at the CERCLA site that their use is well-suited to the particular site. Only those state standards that are identified in a timely manner, and that are more stringent than federal requirements, may be relevant and appropriate. In accordance with the NCP (40 CFR 300.430(f)(1)(ii)(C)(1)), interim remedial actions such as this are not



required to comply with ARARs as long as the final remedial action at the site will comply with them.

Alternative 1 would not meet ARARs. Alternative 2 is expected to comply with the state and federal ARARs that are specific to the limited scope of the interim action, including meeting any RCRA requirements for the leachate being sent off site for disposal.

Upon the completion of the RI/FS, EPA anticipates proposing a final remedial action to address any unacceptable risks that may be posed by the site, including risks posed by the leachate from Landfills A and B. The interim remedial action selected in this ROD will neither be inconsistent with nor preclude implementation of the expected final remedy. ARARs will be further evaluated as a part of the final remedy, and the final remedy will comply with ARARs.

### 3. Long-term Effectiveness and Permanence

The long-term effectiveness and permanence of the alternatives are evaluated in terms of how well an option will work over the long term, including how safely remaining contamination can be managed. Alternative 2 is considered to have the greatest degree of long-term effectiveness and permanence because the leachate in the ponds would be stabilized and controlled by pumping and off-site disposal. Alternative 1 would not achieve or contribute to long-term effectiveness and permanence.

### 4. Reduction of Toxicity, Mobility, or Volume of Contaminants through Treatment

Alternative 1 does not involve any treatment to reduce the toxicity, mobility, or volume of the contaminants. Under Alternative 2, the toxicity of the leachate is reduced by lowering the pH prior to transportation and disposal. This is done by pumping the high-pH leachate through portions of the pond system to blend it with lower-pH liquids and then pumping pond liquids into settling tanks before shipping them off site for disposal.

### 5. Short-term Effectiveness

Alternative 1 has no action associated with it so there would be no short-term impacts associated with its implementation. Alternative 2 would have minimal short-term adverse impacts since no construction work would be required and there would be only minimal truck traffic associated with hauling the leachate off site for disposal. Alternative 2 would also immediately achieve the RAO for this limited-scope interim action by effectively preventing future leachate outbreaks from the Landfill A and B ponds through continued pumping and off-site disposal of leachate as needed.

### 6. Implementability

Alternative 1 has no actions that would be implemented. Alternative 2 could be implemented easily and immediately since it would continue the pumping and off-site

disposal of leachate that was conducted during the 2015 TCRA and 2016 emergency removal action.

#### 7. Cost

Alternative 1 would cost nothing. Alternative 2 is estimated to cost approximately \$300,000 per year until such time as EPA selects and implements a final remedy that addresses Landfill A and B leachate. If Alternative 2 is implemented as an interim remedial action for an assumed period of five years, the total present value of the interim remedy would be approximately \$1,316,000.<sup>2</sup>

#### 8. State/Support Agency Acceptance

The state support agency, MDEQ, supports the selection of Alternative 2 for this limited-scope interim remedial action.

#### 9. Community Acceptance

EPA received no comments from the community during the Proposed Plan public comment period. In telephone conversations between EPA staff and representatives of the City of Gibraltar during the public comment period, city representatives expressed support for continued pumping of the leachate.

### 11.0 Principal Threat Wastes

The NCP establishes an expectation that EPA will use treatment to address the principal threats posed by a site, wherever practical. The principal threat concept is applied to the characterization of "source material" at a Superfund site. Source material is material that includes or contains hazardous substances, pollutants or contaminants that act as a reservoir for migration of contaminants to groundwater, surface water or air, or acts as a source for direct exposure. EPA has defined principal threat wastes as those source materials considered to be highly toxic or highly mobile that generally cannot be reliably contained or would present a significant risk to human health or the environment should exposure occur. Landfill A and B leachate is considered highly toxic source material, and therefore is considered principal threat waste.

Alternative 1 is the "no action" alternative and does not address the principal-threat-waste leachate from Landfills A and B. Alternative 2 uses treatment to address the principal threat waste by reducing the toxicity of the leachate (by lowering its pH) before it is transported off site for disposal.

---

<sup>2</sup> EPA guidance specifies that cost estimates for remedial actions consider the time value of money. A discount rate of 7% was used to calculate the total present value cost, in accordance with current EPA guidance. The cost of Alternative 2 without considering the time value of money is \$1,500,000.

## 12.0 Selected Remedy

EPA has selected Alternative 2 as the appropriate interim remedial action option for the DSC site. The selected interim remedy consists of continuing the pumping and off-site disposal of hazardous leachate at the ponds associated with Landfills A and B that was conducted during the 2015 TCRA and 2016 emergency removal action. The interim remedy will continue until such time as a final remedy is selected and implemented that addresses the Landfill A and B leachate.

The State of Michigan supports the selection of Alternative 2 as the selected interim remedy.

### 12.1 Summary of Rationale for the Selected Remedy

EPA believes it is necessary to take an early interim action at the ponds associated with Landfills A and B to address the release of hazardous leachate that will certainly occur in the absence of further response action. Two remedial alternatives were evaluated for this interim remedial action: no action, or continued pumping and off-site disposal of the leachate. Of the two potential alternatives, only Alternative 2 will achieve the RAO established for the limited scope of the interim action. Alternative 1, No Action, would result in the eventual and continued future overflow of hazardous leachate from the ponds and migration of the leachate into the Frank and Poet Drain. Alternative 2, Source Control of Leachate by Continued Pumping, will stabilize the site, prevent the further migration of contaminants, and prevent further environmental degradation at the site. For these reasons, EPA has selected Alternative 2 as the interim remedial action to address the hazardous leachate associated with Landfills A and B.

### 12.2 Description of Remedial Components

The selected interim action addresses the leachate collecting in the ponds associated with Landfills A and B. The selected interim remedy includes the following source control activities:

- Continued monitoring of pond levels to ensure that the ponds do not overflow and discharge into the surrounding drain systems.
- Continued pumping of the ponds on a regular basis (quarterly or semi-annually, or as otherwise determined necessary by EPA).

The source control activities selected in this ROD are interim measures to prevent the further migration of leachate, while EPA continues through the remedial process and until a final long-term remedial action is selected and implemented that addresses the Landfill A and B leachate.

### 12.3 Summary of Estimated Remedy Costs

The estimated cost of the selected interim action is provided in Table 1. The cost estimate is based on the best available information regarding the anticipated scope of the interim remedy. This is an order-of-magnitude engineering cost estimate that is expected to be within +50 to -30 percent of the actual project cost. As noted earlier, EPA is in the early stages of the RI, so FS-level cost estimates are not available.

### 12.4 Expected Outcome(s) of the Selected Remedy

The selected interim action for the DSC site will control the release of hazardous leachate from Landfills A and B and prevent its further migration to the drains, thereby preventing further environmental degradation. Implementation of the selected interim action will not change any land or resource use at or near the site.

## 13.0 Statutory Determinations

Under CERCLA Section 121 and the NCP, the lead agency must select remedies that are protective of human health and the environment, attain federal and state requirements that are applicable or relevant and appropriate for the selected remedial action (or invoke an appropriate waiver), are cost-effective, and utilize permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable. In addition, CERCLA includes a preference for remedies that employ treatment that permanently and significantly reduces the toxicity, mobility, or volume of hazardous wastes as a principal element and a bias against off-site disposal of untreated wastes.

The following sections discuss how the selected interim remedy addresses these statutory requirements.

### 13.1 Protection of Human Health and the Environment

The selected remedy is a protective interim action only and is not intended to be the final remedy for the Landfill A and B leachate. It is not intended to be protective of human health and the environment for all site risks or for all risks associated with the leachate. The selected remedy will provide adequate steps in the short term to prevent the discharge of leachate into the drains until a final remedy that addresses the leachate is implemented. The selected interim source control activities will prevent leachate from overflowing the ponds associated with Landfills A and B, and abate the potential risk of further contamination of the drains. The selected remedy will not pose unacceptable short-term risks or cross-media impacts.

### 13.2 Compliance with ARARs

The selected remedy is expected to comply with the federal and state ARARs that are specific to the limited scope of this interim action. Upon the completion of the RI/FS, EPA anticipates proposing a final remedial action for the entire site. The interim remedial

action selected in this ROD will neither be inconsistent with nor preclude implementation of the expected final remedy. The ARARs for this interim action are listed in Tables 2 and 3. All federal and state ARARs identified for this interim remedial action will be met.

### 13.3 Cost-Effectiveness

EPA has determined that the selected remedy is cost-effective and represents a reasonable level of protectiveness (in this case, prevention of further environmental degradation) for the money to be spent, especially considering the objectives of the interim action. In making this determination, the following definition was used: "A remedy shall be cost-effective if its costs are proportional to its overall effectiveness." (NCP Section 300.430(f)(1)(ii)(D)). "Overall effectiveness" was evaluated by assessing three of the five balancing criteria (long-term effectiveness and permanence; reduction in toxicity, mobility, and volume through treatment; and short-term effectiveness). Overall effectiveness was then compared to costs to determine cost-effectiveness. The relationship of the overall effectiveness of this interim remedial action was determined to be proportional to its costs and hence the remedy represents a reasonable level of protectiveness for the money spent. The estimated total present value cost of the selected interim remedial action is \$1,316,000 (calculated for a five-year period).

### 13.4 Utilization of Permanent Solutions and Alternative Treatment (or Resource Recovery) Technologies to the Maximum Extent Practicable

The selected remedy represents an interim solution until a final remedy that addresses the Landfill A and B leachate is selected and implemented, and is not intended to be a permanent solution. The selected interim action uses treatment technologies to the maximum extent practicable for the limited scope of the action. EPA anticipates utilizing permanent solutions as part of the final remedy.

### 13.5 Preference for Treatment as a Principal Element

This selected interim action satisfies the statutory preference for treatment. The hazardous leachate will be treated to reduce the pH to non-hazardous levels by pumping it through the pond system before it is sent to an off-site disposal facility.

### 13.6 Five-Year Review Requirements

Because this remedy will result in hazardous substances, pollutants, or contaminants remaining on site above levels that allow for unlimited use and unrestricted exposure (UU/UE), a statutory review will be conducted within five years after initiation of the remedial action to ensure that the remedy is, or will be, protective of human health and the environment. Additional five-year reviews will be required as long as such materials remain on site above levels that allow for UU/UE.

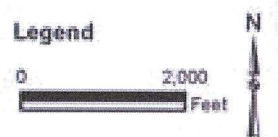
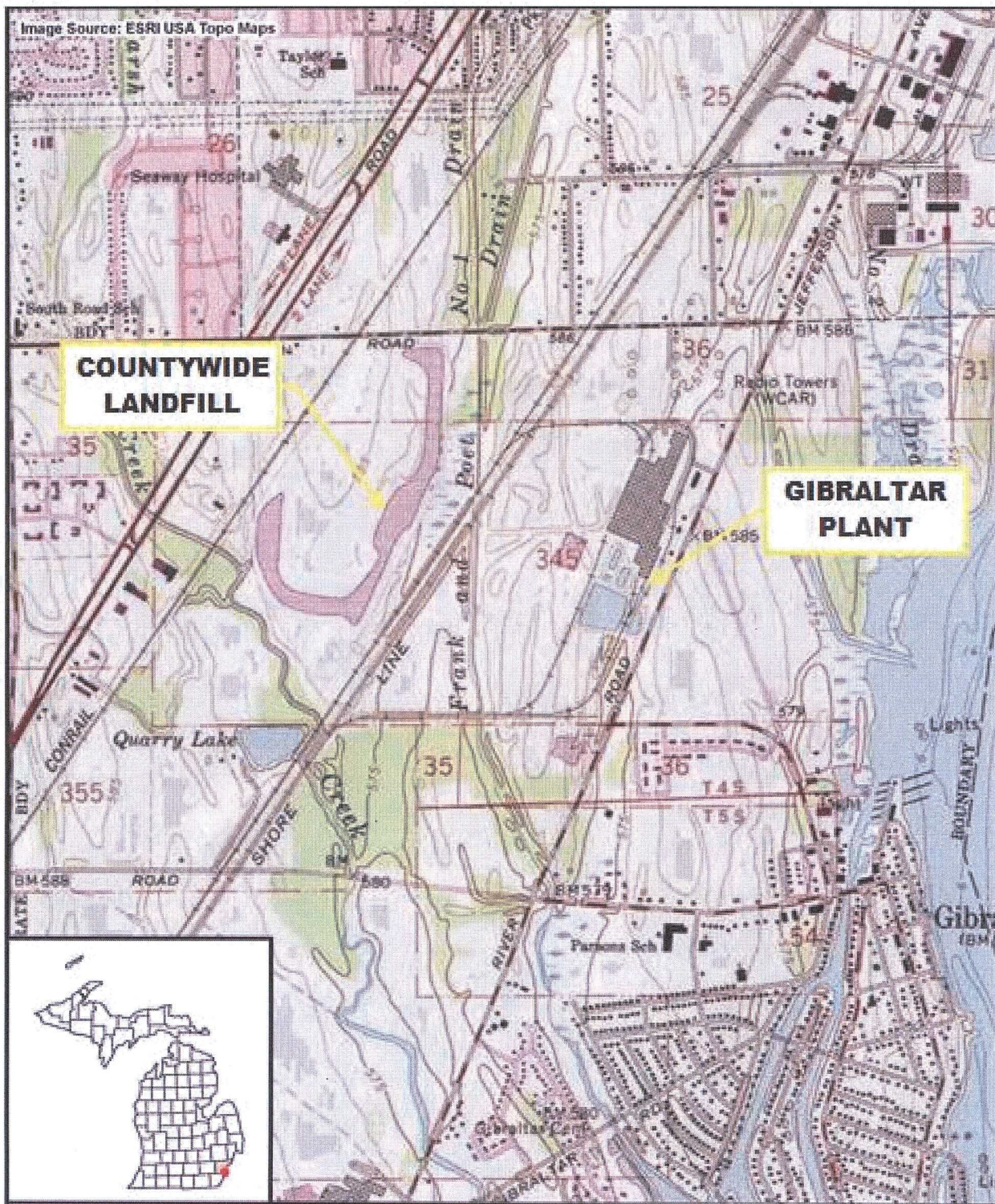
## 14.0 Documentation of Significant Changes

The Proposed Plan for the DSC site identified Alternative 2 as the preferred interim remedial action alternative. The Proposed Plan public comment period ran from April 4 to May 3, 2016. CERCLA Section 117(b) and NCP 300.430(f)(5)(iii) require an explanation of significant changes from the remedy presented in the Proposed Plan if any comments were received that change what was presented in the Proposed Plan. Since no comments were received during the public comment period, EPA determined that no significant change to the remedy as identified in the Proposed Plan was necessary.

### **PART III: RESPONSIVENESS SUMMARY**

In accordance with CERCLA Section 117, 42 U.S.C. Section 9617, EPA released the Proposed Plan and Administrative Record on April 3, 2016, and the public comment period ran from April 4 through May 3, 2016, to allow interested parties to comment on the Proposed Plan. EPA did not schedule a public meeting but offered to hold one if requested. No one requested a public meeting, and EPA received no comments on the Proposed Plan.

# FIGURE 1




 Prepared For:  
**U.S. EPA REGION V**  
 Contract No.: EP-55-06-04  
 TDD: S05-0005-1304-007  
 DCN: 2145-2A-BJSK

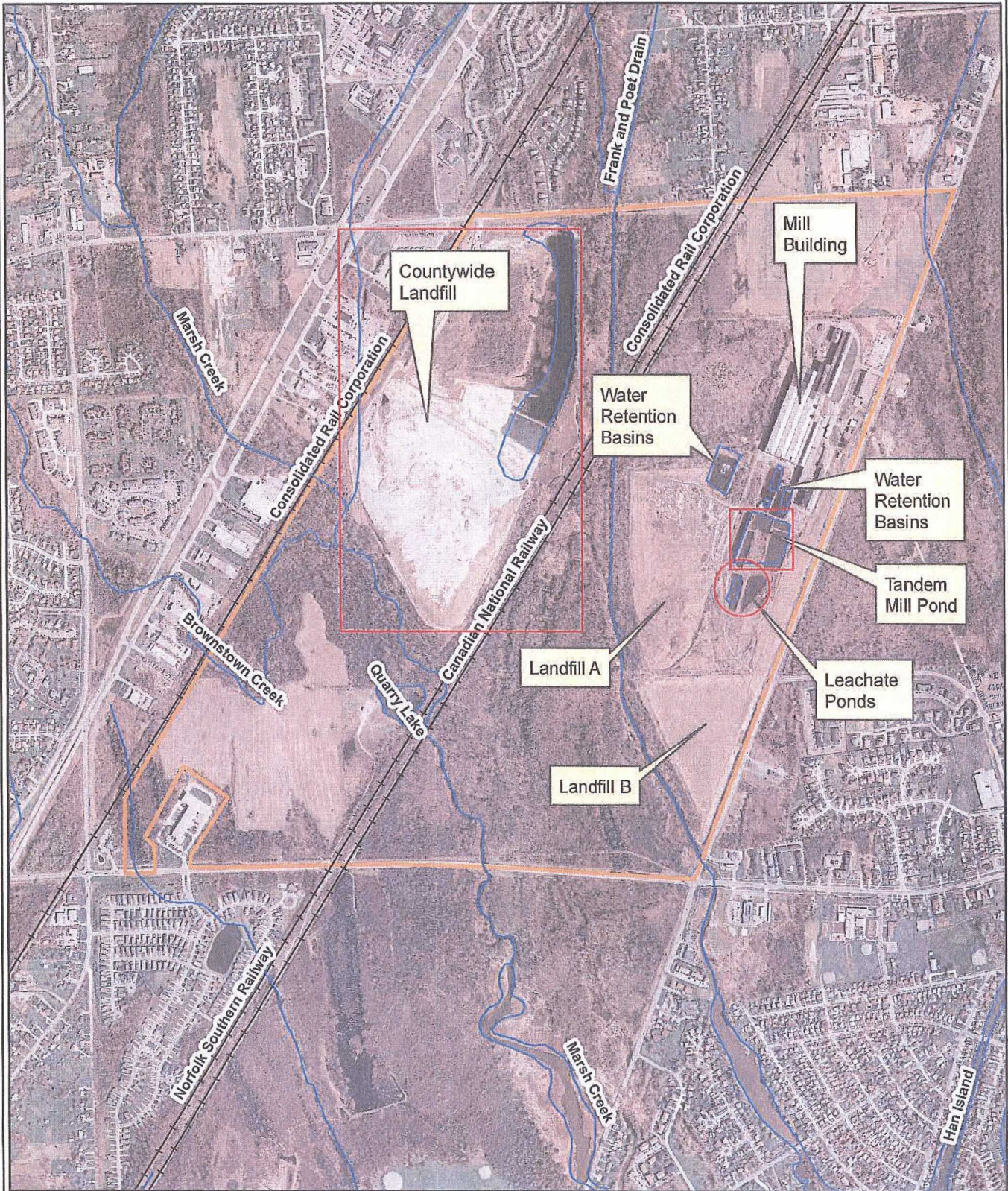

 Prepared By:  
**WESTON SOLUTIONS, INC**  
 750 E. Bunker Court  
 Suite 500  
 Vernon Hills, IL 60061

**FIGURE 1**  
 Site Location Map  
 DSC Site



## FIGURE 2

# FIGURE 2 SITE FEATURES



Site Reassessment  
 McLouth Steel Corp Gibraltar Plant Site  
 28000 W. River Road  
 Gibraltar, MI 48173  
 MID005320254



0 500 1,000 2,000 Feet

Compiled by: Leni L. Steiner-Zehender  
 February 2013  
 Projected Coordinate System:  
 Michigan GeoRef, NAD-83, meters  
 Completed with ESRI ArcView 10.1  
 Source: Michigan Geographic Data Library

# TABLE 1

**Table 1 - Cost Estimate for Source Control Activities, Alternative 2**  
DSC McLouth Steel Gibraltar Plant Superfund Site

**Yearly Cost**

<b>Transportation &amp; Disposal</b>					
	<i>Quantity</i>	<i>Subtotal</i>	<i>Trans</i>	<i>Samples</i>	<i>Total</i>
Leachate	2,000,000/year	\$260,000	0		\$260,000
<b>TRANSPORTATION &amp; DISPOSAL TOTAL</b>					<b>\$260,000</b>
<b>Personnel &amp; Equipment</b>					
Assumes mobilization 3 times per year	\$13,000 per mobilization				
<b>PERSONNEL AND EQUIPMENT TOTAL</b>					<b>\$39,000</b>
<b>Miscellaneous</b>					
Fuel, Supplies					\$1,000
<b>MISC. TOTAL</b>					<b>\$1,000</b>
<b>TOTAL</b>					<b>\$300,000</b>

**NOTES:**

The annual cost for leachate drawdown in the ponds associated with Landfills A and B is estimated at \$300,000 based on costs incurred during EPA's prior removal actions.

The cost of the interim remedial action over a period of 5 years, without accounting for the time value of money, is  $\$300,000 \times 5 = \$1,500,000$ .

In accordance with current EPA guidance, a discount rate of 7% should be used to account for the time value of money when calculating remedy costs. Based on those calculations, the total present value cost of the remedy over a 5-year period is approximately \$1,316,000.

# TABLE 2

**TABLE 2**  
**Federal ARARS**  
**DSC McLouth Steel Gibraltar Plant Superfund Site**

<b>Regulation/Citation</b>	<b>Description</b>	<b>Rationale</b>
Toxic Substances Control Act (TSCA)/ 15 USC §§2601 to 2692	TSCA addresses the production, importation, use, and disposal of specific chemicals including PCBs.	PCBs have been found in the leachate generated at the site in the past.
TSCA Polychlorinated Biphenyls (PCB) Regulations 40 CFR 761	This regulation establishes prohibitions of, and requirements for, the manufacture, processing, distribution in commerce, use, disposal, storage, and marking of PCBs and PCB Items.	Provides cleanup levels and disposal requirements at Superfund sites with PCBs.
Criteria for Classification of Solid Waste Disposal Facilities and Practices/ (RCRA Regulations) 40 CFR 257	Establishes standards for the management and disposal of solid waste, including: 1) Facility or practices in floodplains will not restrict the flow of base flood, reduce the temporary water storage capacity of the floodplain, or otherwise result in a washout of solid waste; 2) Facility or practices shall not cause discharge of dredged or fill material into waters of the United States; 3) Facility or practice shall not allow uncontrolled public access so as to expose the public to potential health and safety hazards; 4) Covers groundwater monitoring and corrective action requirements under Subpart E and closure and post-closure care under Subpart F.	May be considered as it offers guidance on management of waste.
Resource Conservation and Recovery Act (RCRA) (see Solid Waste Disposal Act)/ 42 USC §§ 6901 to 6992k	RCRA addresses solid wastes and hazardous wastes in or on the land; requires the conversion of existing open dumps to facilities which do not pose a danger to the environment or to health.	Provides guidance on management of solid waste.
USDOT Placarding and Handling 40 CFR 264.227 49 CFR 171	Transportation and handling requirements for materials containing PCBs with concentrations of 20 mg/kg or more.	This would apply to transportation of PCB contamination removed from the site.
Occupational Safety and Health Act – Hazardous Waste Operations and Emergency Response 29 CFR 1910.120	Establishes health and safety requirements for cleanup operations at sites on the National Priorities List.	Applies to any action alternative for protection of onsite workers.

# TABLE 3

**TABLE 3**  
**Michigan ARARs**  
DSC McLouth Steel Gibraltar Plant Superfund Site

Regulation/Citation	Description	Rationale
<p>Michigan Occupational Safety and Health Act (MIOSHA)  Public Act 154 of 1974, as amended.</p> <p>Michigan Administrative Code:</p> <ul style="list-style-type: none"> <li>• Safety Standards for General Industry;</li> <li>• Health Standards for General Industry;</li> <li>• Safety Standards for Construction;</li> <li>• Health Standards for Construction;</li> <li>• Administrative Rules for General Industry, Construction Health, and Agricultural Operations (R 408.1001-1094).</li> </ul>	<p>Occupational safety and health standards adopted to provide safe and healthful employment or places of employment, which may include medical monitoring. Provides safety standards for hazards, air contaminants, physical hazards, health hazard control measures, illumination, sanitation, employee right-to-know, and others. Regulations containing worker health and safety standards for construction and general industry operations and requirements for worker training specifically "Hazardous Waste Operations and Emergency Response (HAZWOPER)." This is the statute adopted by Michigan from the Federal OSHA. Rules contain a list of permissible exposure limits in the work place for more than 600 chemical compounds.</p>	<p>On-site remedial actions have the potential to expose workers to contaminants found in affected media, i.e., soil, air and water. Construction, excavation and other site actions may present potential health hazards to nearby workers. Human labor will likely be required to construct remedial systems as well as provide long-term routine/non-routine maintenance on the systems. Such activities are governed by worker safety and health standards under this act and are applicable to all site actions and activities.</p>
<p>Michigan Motor Carrier Safety Act of 1963  Public Act 181 of 1963, as amended. (MCL 480.11, <u>et seq.</u>)</p> <p>Michigan Administrative Code:  Transportation of Hazardous Materials (R 480.11-25).</p>	<p>Rules governing the transportation of hazardous materials.</p>	<p>Used to protect the public, first responders to hazardous incidents and the environment from hazardous materials.</p>
<p>Part 17, Michigan Environmental Protection Act, of The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). (MCL 324.1701, <u>et seq.</u>)</p> <p>Michigan Administrative Code:  R 324.1701, <u>et. seq.</u></p> <p>Formerly known as Act 127 (1970)</p>	<p>Provides for the protection of natural resources. The protection of state resources prohibits any action that pollutes, impairs, or destroys the state's natural resources, due to any activities conducted at a site of environmental contamination.</p>	<p>Applied in remedial investigation, remedial design, response activity and remedial action activities.</p>



Regulation/Citation	Description	Rationale
<p>Part 31, Water Resources Protection, of The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). (MCL 324.3104, <u>et seq.</u>)</p> <p>Michigan Administrative Code: R 324.3103, <u>et. seq.</u></p> <ul style="list-style-type: none"> <li>• Part 1: General provisions provide purpose, i.e., implementation of the act and definitions (R 323.1001, <u>et. seq.</u>);</li> <li>• Part 4: Michigan water quality standards for surface waters to protect public health and welfare, enhance and maintain water quality, and protect the state's natural resources (R 323.1041-1117);</li> <li>• Part 5: Spillage of oil and polluting materials addresses spill containment, prevention, clean-up, and reporting (R 323.1158, <u>et. seq.</u>);</li> <li>• Part 6: Cleaning agents and water conditioners (R 323.1171, <u>et. seq.</u>);</li> <li>• Part 8: Water quality based effluent limits for toxic chemicals (R 323.1201-1221);</li> <li>• Part 9: Wastewater Reporting (R 299.9001, <u>et. seq.</u>);</li> <li>• Part 10: Treatment plant operators;</li> <li>• Part 21: Wastewater discharge permits identifies NPDES and State groundwater discharge requirements, including procedures for permit application, permit issuance, and denial (R 323.2106, R 323.2108-9, R 323.2114, R 323.2117-2119, R 323.2128, R 323.2136, R 323.2145, R 323.2149-2151, R 323.2154-2155, R 323.2162-2164, and R 323.2190-2192);</li> <li>• Part 22: Groundwater quality rules R 323.2201-2240); and</li> <li>• Part 23: Pretreatment (R 323.2301 <u>et. seq.</u>).</li> </ul> <p>Formerly known as Act 245 (1929)</p>	<p>These rules address discharges to both surface waters and groundwater of the State. Part 31 prohibits direct or indirect discharge to ground or surface waters of the state that are or may become injurious to the environment or public health. Regulates water and wastewater discharges with standards for discharge to groundwater. Defines effluent guidelines based on actual water quality, receiving stream properties, and other appropriate water quality criteria. Provides criteria and standards for the National Pollutant Discharge Elimination System (NPDES) and effluent standards for toxic pollutants. This is the implementing statute for the federally delegated NPDES program.</p>	<p>Remedial action may result in the discharging of remediated and unremediated contaminated groundwater into waters of the state, i.e., groundwater, surface water, or any other water course. Applicable for remedial alternatives which will treat and/or discharge wastewater to surface waters of the state. Cites specific requirements for the discharge of bioaccumulative chemicals. Discharge requirements can be identified through a substantive requirements document (SRD). Prevents concentrations in surface water of taste and odor producing substances. Prevents acutely and chronically toxic substances from entering surface water based on the LC50 toxicity criteria. Prevents degradation of water quality. Restricts levels of turbidity, color, oil films, floating solids, foams, settling and suspended solids, and deposits.</p>

Regulation/Citation	Description	Rationale
<p>Part 115, Solid Waste Management, of The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). (MCL 324.115, <u>et seq.</u>)</p> <p>Michigan Administrative Code: R 324.11501, <u>et seq.</u></p> <p>Formerly known as Act 641 (1978)</p>	<p>Addresses solid waste management including general landfill design requirements as promulgated in the administrative rules of the Michigan Solid Waste Management Regulations. Regulates the construction and operation of sanitary landfills, solid waste transfer facilities, and solid waste processing plants. Specifies liner and capping requirements for solid waste landfills. Requirements for the operation and closure of non-hazardous waste treatment, storage, and disposal and groundwater quality performance standards. Also imposes geographic limitations on where non-hazardous solid waste can be disposed.</p>	<p>Regulates the disposal of non-hazardous solid waste. Provides requirements for closure and post-closure of non-hazardous solid waste treatment, storage, and disposal facilities. Provides groundwater quality performance standards. Remedial action may produce non-hazardous solid waste, which must be disposed of in accordance with Part 115. Used for determining the process and type of disposal facility that solid waste or contaminated media may be removed to. May apply to closure (capping) of a landfill. May serve as a basis of design for containment of non-hazardous solid waste on-site.</p>
<p>Part 121, Liquid Industrial Wastes, of The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). (MCL 324.121, <u>et seq.</u>)</p> <p>Michigan Administrative Code: R 324.12101, <u>et seq.</u></p> <p>Formerly known as Act 136 (1969)</p>	<p>Regulates liquid industrial waste generators, transporters and designated facilities. Transporters are required to be registered and permitted in accordance with the hazardous materials transportation act. Requires a registered and permitted liquid industrial waste transporter to remove any liquid waste off-site. Records are required to be kept by those who generate such waste, under Section 3a. Liquid industrial waste is defined as "any liquid waste, other than unpolluted water."</p>	<p>Remedial action may require the storage, transportation and disposal of liquid industrial wastes. Applies to the on and off-site management of liquid industrial wastes.</p>
<p>Part 201, Environmental Remediation, of The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). (MCL 324.201, <u>et seq.</u>)</p> <p>Michigan Administrative Code: R 299.5511(3)(d), <u>et seq.</u></p> <p>Formerly known as Act 307 (1982)</p>	<p>In part, protects the environment and natural resources of the state; regulates the discharge of certain substances into the environment; regulates the use of certain lands, waters, and other natural resources of the state; and prescribes the powers and duties of certain state and local agencies and officials.</p>	<p>Establishes cleanup criteria for sites of environmental contamination based on current and future land use. Regulates cleanup of releases of hazardous substances in concentrations that constitute a facility as that term is defined in Section 20101(o) of Act 451 to soil and groundwater.</p>

Regulation/Citation	Description	Rationale
<p>Part 327, Great Lakes Preservation, of The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). (MCL 324.327, <u>et seq.</u>)</p> <p>Michigan Administrative Code: R 324.32701, <u>et seq.</u></p>	<p>The waters of the state are valuable public natural resources held in trust by the state, and the state has a duty as trustee to manage its waters effectively for the use and enjoyment of present and future residents and for the protection of the environment. The waters of the Great Lakes within the boundaries of this state shall not be diverted out of the drainage basin of the Great Lakes.</p>	<p>May be applied to site remediation that would affect the diversion or consumptive use of waters of the Great Lakes.</p>
<p>Part 329, Great Lakes Protection, of The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). (MCL 324.329, <u>et seq.</u>)</p> <p>Michigan Administrative Code: R 324.32901, <u>et seq.</u></p>	<p>Careful management of the Great Lakes will permit the rehabilitation and protection of the lakes, their waters, and their ecosystems, while continuing and expanding their use for industry, food production, transportation, and recreation.</p>	<p>May be applied to site remediation that would affect the Great Lakes.</p>
<p>Part 401, Wildlife Conservation, of The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). (MCL 324.401, <u>et seq.</u>)</p> <p>Michigan Administrative Code: R 324.40102, <u>et seq.</u></p>	<p>Regulates wildlife conservation.</p>	<p>May be applied to identifying wildlife habitat near environmental sites of contamination where an ecological risk assessment(s) may be conducted. May be used in conjunction with the Michigan Features Inventory List to identify habitat where an environmental site of contamination may impact wildlife.</p>
<p>Part 411, Protection and Preservation of Fish, Game, and Birds, of The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). (MCL 324.411, <u>et seq.</u>)</p> <p>Michigan Administrative Code: R 324.41101, <u>et seq.</u></p>	<p>Regulates the protection and preservation of fish, game, and birds.</p>	<p>May be applied to site remediation to protect and preserve fish, game and birds.</p>

# APPENDIX A



374343

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMOVAL ACTION



ADMINISTRATIVE RECORD  
FOR  
DSC-GIBRALTAR SITE  
(FORMER MCLOUTH STEEL GIBRALTAR COMPLEX)  
GIBRALTAR, WAYNE COUNTY, MICHIGAN

ORIGINAL  
SEPTEMBER 28, 2009

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	06/22/99	U.S. EPA	Respondent	Administrative Order (Docket No. R7003-5-99-003) for the DSC-Gibraltar Site (Not Signed) SDMS ID: 331029)	10
2	02/07/07	Jereza, L., U.S. EPA	Wilkinson, M., DSC Ltd.	Letter re: Notice of Non-Compliance with Administrative Order (Docket No. R7003-5-99-003) for the DSC-Gibraltar Site w/ Attachments SDMS ID: 331030)	12
3	02/22/07	Barr, R., Honigman Miller Schwartz & Cohn LLP	Sharrow, D., U.S. EPA	Letter re: Response to U.S. EPA's February 7, 2007 Notice of Non-Compliance Letter re: the DSC-Gibraltar Site w/Attachment SDMS ID: 331031)	11
4	03/13/07	Jereza, L., U.S. EPA	El-Zein, J., U.S. EPA	Memorandum re: Summary of Compliance with RCRA 7003 Imminent and Substantial Endangerment Order Issued to DSC Ltd. on June 21, 1999 SDMS ID: 331032)	2
5	09/02/08	Kecskemeti, T., MDEQ	Wilkinson, M., DSC Ltd.	Violation Notice (VN-003639) Issued to DSC Ltd. for the DSC-Gibraltar Site w/Attachment SDMS ID: 331033)	3
6	09/16/08	Baldwin, F., MDEQ	Durno, M., U.S. EPA	Letter re: MDEQ Requests U.S. EPA Assistance with Emergency Response Action at the DSC-Gibraltar Site SDMS ID: 331034)	2

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
7	09/26/08	MDEQ Environmental Laboratory	U.S. EPA	Sampling and Analysis Data for the DSC-Gibraltar Site (Lab Work Order #80900075) SDMS ID: 331035)	9
8	01/06/09	Weston Solutions, Inc.	U.S. EPA	Draft Conceptual Leachate Treatment and Landfill Capping Alternatives and Costs for Detroit Cold Rolling Facility and County Wide Landfill SDMS ID: 331036)	55
9	07/17/09	Bruchmann, G., MDEQ	Schlieger, B., U.S. EPA	Letter re: Emergency Re- sponse Actions at the DSC Ltd. and Countywide Landfill Facilities SDMS ID: 331037)	2
10	08/05/09	Schlieger, B., U.S. EPA	Yordanich, D., MDEQ	Letter re: U.S. EPA Re- quests that MDEQ Identify all ARARs for the Proposed Removal Action at DSC Ltd and Countywide Landfill Facilities SDMS ID: 331038)	2
11	08/10/09	Yordanich, D., MDEQ	Schlieger, B., U.S. EPA	Letter re: ARAR Request Letter for the DSC Ltd. and Countywide Landfill Facilities SDMS ID: 331039)	2
12	09/28/09	Schlieger, B., U.S. EPA	Karl, R., U.S. EPA	Enforcement Action Memorandum: Determination of an Imminent and Sub- stantial Threat to Public Health and the Environment for the Former McLouth Steel Gibraltar-Complex also Referred to as De- troit Steel Corporation (DSC)-Gibraltar (PORTIONS OF THIS DOCUMENT HAVE BEEN REDACTED/SDMS ID: 331040)	22

UPDATE #1  
SEPTEMBER 17, 2010

1	02/11/10	Environmental Quality Management, Inc.	File	Sample Location Map for the November 16 & 17, 2009 Sample Collection at the Countywide L.F. and DSC 1A & 1B (SDMS ID: 374338)	1
---	----------	---	------	---	---

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
2	03/02/10	Kelly, B. & J. Lippert, U.S. EPA	Distribution List	Pollution Report (POLREP) No. 1 - Site Mobilization at the DSC-Gibraltar/County- wide Site (SDMS ID: 358807)	3
3	03/24/10	Kelly, B. & J. Lippert, U.S. EPA	Distribution List	Pollution Report (POLREP) No. 2 for the DSC-Gibraltar /Countywide Site (SDMS ID: 358980)	3
4	04/22/10	Kelly, B. & J. Lippert, U.S. EPA	Distribution List	Pollution Report (POLREP) No. 3 Continuation of Sump Construction at the Former McLouth Steel Gibraltar- Complex Site (SDMS ID: 374337)	3
5	05/27/10	Kelly, B., U.S. EPA	AuBuchon, L., MDNRE	Memorandum re: Summary of Proposed Removal Actions at the McLouth Steel Gi- bralter Complex (SDMS ID: 374339)	18
6	06/02/10	Aubuchon, L., MDNRE	Kelly, B., U.S. EPA	E-Mail Message re: MDNRE Concurrence with U.S. EPA Summary of Proposed Actions and Pursuit of NPL Scoring at the DSC-Gibraltar Site w/Reply History (SDMS ID: 374340)	2
7	06/08/10	AuBuchon, L., MDNRE	Kelly, B., U.S. EPA	E-Mail Message re: MDNRE Concurrence with the U.S. EPA Draft Operation and Maintenance Agreement for the DSC-Gibraltar Site (SDMS ID: 374341)	1
8	06/10/10	Kelly, B., U.S. EPA	AuBuchon, L., MDNRE	Memorandum re: Modifica- tions to the July 17, 2009 Operation and Maintenance Agreement for the McLouth Steel Gibraltar-Complex (SDMS ID: 374342)	1
9	09/17/10	Kelly, B., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Approval for Change in Scope and Increase in Funding and an Exemption from the \$2 Million Statu- tory Limit for the Removal Action at the Former McLouth Steel Gibraltar-Complex Site (PORTIONS OF THIS DOCUMENT HAVE BEEN REDACTED/SDMS ID: 374336)	24

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMOVAL ACTION**

**ADMINISTRATIVE RECORD  
FOR THE  
DSC MCLOUTH STEEL GIBRALTAR PLANT SITE  
GIBRALTAR, WAYNE COUNTY, MICHIGAN**

**UPDATE 2  
JUNE 10, 2015  
SEMS ID: 918620**

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	299783,	12/17/99	MDEQ	Detroit Steel Company, Ltd.	Comprehensive Corrective Action and Remedial Consent Order for Trenton and Gibraltar Facilities	190
2	917528	11/3/09	Kelly, B., U.S. EPA	Hamblin, P., and J. Walczak, MDEQ	Letter re: DSC - Trenton Site Evaluation by Site Assessment Program	1
3	383484	12/22/10	Kelly, B., U.S. EPA	Distribution List	Pollution Report (POLREP) #4	3
4	387378	3/8/11	Kelly, B., U.S. EPA	Distribution List	Pollution Report (POLREP) #5	3
5	915708	5/6/11	Environmental Quality Management	U.S. EPA	Draft Environmental Assessment Report	2405
6	915707	3/28/13	Lawson, A., MDEQ	U.S. EPA	CERCLA Re-Assessment Report for McLouth Steel Corp. Gibraltar Plant	25
7	917525	7/24/13	Lawson, A., MDEQ	U.S. EPA	CERCLA Re-Assessment Report for McLouth Steel Corp. Gibraltar Plant	25
8	915726	1/1/14	Weston Solutions	U.S. EPA	Area Calculation for Source No. 1	4
9	915700	9/1/14	Muniz, N, U.S. EPA	File	Hazard Ranking System Documentation Record	66
10	917526	2/16/15	Wilkinson, M., Detroit Steel Company, Ltd.	Wojtowicz, R., Wayne County Treasurer	Letter re: Transfer of Ownership/Control of DSC Property in Gibraltar, Michigan	2
11	918170	5/5/15	Kozel, L., Tetra Tech	Lippert, J., U.S. EPA	Site Assessment Report	144



<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
12	918171	5/7/15	Collier, D., U.S. EPA	Lippert, J., U.S. EPA	Email re: Need for ERB Assistance on the DSC McLouth Steel Site	1
13	918765	6/10/15	Kelly, B., and Lippert, J., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum re: Request for Approval of a Time-Critical Removal Action at the DSC McLouth Steel Gibraltar Plant (a.k.a. Former McLouth Steel Gibraltar Complex) Site <i>(Portions of this document have been redacted)</i>	21

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMOVAL ACTION**

**ADMINISTRATIVE RECORD  
FOR THE  
DSC MCLOUTH STEEL GIBRALTAR PLANT SITE  
GIBRALTAR, WAYNE COUNTY, MICHIGAN**

**UPDATE 3  
MARCH 31, 2016  
SEMS ID: 924224**

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	924223	3/16/16	Frey, B., U.S. EPA	Mankowski, M., U.S. EPA	Email re: Request for Removal Assistance with McLouth Retention Ponds	2

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMEDIAL ACTION

ADMINISTRATIVE RECORD  
FOR THE  
DSC MCLOUTH STEEL GIBRALTAR PLANT SITE  
GIBRALTAR, WAYNE COUNTY, MICHIGAN

UPDATE 4  
APRIL 4, 2016  
SEMS ID: 924232

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	924232	3/22/16	U.S. EPA	Public	Proposed Plan for Interim Cleanup	13

# APPENDIX B

Sunday, April 3, 2016

www.heritage.com

## GARAGE SALES

**YARD, RUMMAGE & GARAGE SALES**  
**MOVING SALE.** By appt only 4/3 & on. 31525 W. Jefferson, Brownstown. 734-308-0361

## HELP WANTED GENERAL

**AIRCRAFT CLEANERS & PASSENGER SERVICE ASSISTANTS**  
 at Metro Airport. Full and part time. All shifts avail. Must be 18 years of age, with valid drivers license. On the Spot Interviews. Prospect Airport Services, 30655 Beverly Rd, Romulus

C.H. Brown Transportation **HIRING LOCAL SWITCHER CDL A - HAZMAT TANKER ENDORSEMENT**  
 40+ hr/wk, \$17/hr start, benefits, \$250 sign on bonus. (great work environment/on site at BASF in Wyandotte MI) JOHN 734-761-5771 johnjasso@yahoo.com

**EXP. CONCRETE FINISHERS AND LABORERS NEEDED**  
 Full time - pay based on experience. Start immediate 734-379-5113

Great Lakes Aggregates is accepting resumes for a **HEAVY EQUIPMENT OPERATOR AND MAINTENANCE PERSON** for work at our Sylvania Minerals quarry. Background in construction or mining related fields is preferred, but not req'd.

We offer a competitive wage and benefit package. Pre-employment drug screen, physical and background check is req'd. Great Lakes Aggregates is an EO/Affirmative Action employer for all including Women, Minorities, Veterans and individuals with disabilities.  
 Please send resume and cover letter to resumes@greatlakesagg.com. No phone calls please.

**MAINTENANCE POSITION**  
 at apt complex in Brownstown. \$12/hr. Full time. Call Herman 248-760-0942

**THIS IS THE PLACE FOR CASH!** So if you're a cash hand to sell, call the classified department today!

## HELP WANTED GENERAL

**MECHANIC/DISMANTLER**  
 Own tools Required. Dismantling vehicles. Must have automotive experience. Good pay, full time, paid vacation. Send resume to 313-381-6210 or pauldiazauto@gmail.com



Moving Co. immediately hiring **EXPERIENCED DRIVERS / MOVERS.** Must have chauffeur license. Must have 2 years moving exp. Frequent heavy lifting req'd. Must be a hard worker. Plenty of work. 313-483-2250

**Office Assistant**  
 Proficient in Excel Payroll experience helpful. Farming experience helpful but not necessary. Please email resume and cover letter to: Robecca@bebowfarms.com

**ROOFING LABORERS NEEDED**  
 Valid license, willing to work. Environmental Industrial Services, Belleville 734-699-4949

**SORTING & INSPECTING**  
 Established Co seeking quick learners. \$10/hr. No exp. needed. Must have own vehicle. Apply online at: matrixjobs.net or call M-F btwn. 9-3pm. 810-239-6053

## HELP WANTED FULL TIME

Downriver Co. seeks a **CNC machinist and Boring Mill Operator.** Must have minimum 5 years exp. Must be able to program/setup and machine various types of weldments and castings. Must be able to read blue prints and have understanding of geometric tolerancing. Please email resume to [broy@intergrity.com](mailto:broy@intergrity.com) or send to P.O. Box 526 Wyandotte MI, 48192

TanTara Transportation is hiring Company Drivers and Owner Operators for Flatbed, Van, or Tank. Excellent equipment, pay, benefits, home weekly. Call 800-650-0292 or apply [www.tantara.us](http://www.tantara.us) (MICH)

**CAN'T FIND IT?** Find it the easy effective way. Use a low cost "Wanted to Buy" classified ad.

## HELP WANTED PART TIME

**CLEANING PEOPLE NEEDED**  
 Mon - Sat 6am - 1 pm \$10/hr. Metro Airport area 596-698-7324

## ACCOUNTING & FINANCE

Downriver CPA firm is seeking an exp'd **BOOKKEEPER/ACCOUNTANT.** Government exp. is preferred. Send resume & salary requirements to D&MPC, 20500 Eureka Rd, Suite 300, Taylor, MI 48180.

## AUTOMOTIVE

Crest Ford is looking for a **SERVICE TECHS FROM LUBE TECH TO DIESEL TECH**  
 Business is great!! We are growing and WE NEED HELP

We offer \$41K+ complete wages/benefits  
 Call Burr 734-782-2400 or email burrt@cresttag.com

## CLERICAL / ADMINISTRATIVE

**CLERICAL POSITION**  
 Part-time for doctor's office. Experience preferred. Email resume [downrivermedoffice@gmail.com](mailto:downrivermedoffice@gmail.com)

**SECRETARY/ADMIN. ASST.**  
 Exp'd, skilled with computers, outgoing, exc. typing skills req'd. Located in Lincoln Park. Email resume to American Indian Services [amerinserv@ameritech.net](mailto:amerinserv@ameritech.net)

## CUSTOMER SERVICE

**CUSTOMER SERVICE/SALES ASSOCIATE**  
 Full time position at established special events company. Successful candidate will possess excellent customer service, communication, and organizational skills. Have sales experience and be comfortable cold calling. Pay rate is \$12-\$15/hr. Send resume to [FunServices@comcast.net](mailto:FunServices@comcast.net) or Fun Services, 20430 Van Horn Road, Woodhaven, MI 48183

## DENTAL

**DENTAL FRONT DESK,** with previous dental office experience. Eaglesoft or comparable software knowledge necessary. Allen Park. Email resume to [mjpasera@gmail.com](mailto:mjpasera@gmail.com)

**SHOP FROM** your easy chair. Shopping the classifieds is easy, relaxing and you don't have to worry about parking.

## DENTAL

**DENTAL RECEPTIONIST**  
 Experience a must. F/T for busy W. Dearborn office. Email resume to: [info@selendentalurgery.com](mailto:info@selendentalurgery.com) NO PHONE CALLS

## ORAL SURGICAL ASSISTANT

Experience a must. F/T for busy W. Dearborn office. Email resume to: [info@selendentalurgery.com](mailto:info@selendentalurgery.com) NO PHONE CALLS

## DIRECT CARE

**DIRECT CARE STAFF**  
 Needed in the Downriver area. \$9.50/hr to start. Call 734-722-4580 Ext #18

Hiring **CAREGIVERS** Full and Part Time, Downriver Area, Western Wayne County. Apply at [lovingcarehomecare.com](http://lovingcarehomecare.com) or call 734-676-5564

## DRIVERS

**ASA Logistics Taylor, MI**  
 Independent Contractors needed to drive 26' box trucks in Detroit Metro area on 3rd shift. Pallet drop dock-to-dock or lift gate. Candidates must possess chauffeur license or CDL with no air brake restr. Be at least 23 yrs; drug free and able to test; acceptable driving and crim. records; DOT med certification and 2 years commercial driving experience. Able to lift up to 50# and work any day of week. Email resume to [pat@asa-logistics.com](mailto:pat@asa-logistics.com).

**REMEMBER** - when placing a classified to get fast results be sure to include:  
 1) all the details  
 2) include the price  
 3) be available to callers  
 As easy as 1 - 2 - 3!

**CLASSIFIEDS WIN!!**  
 When it comes to saving time, energy and money, Classifieds are in first place! Place your classified and see how easy it is to be a winner!

## FORECLOSURES

### FORECLOSURE NOTICE

RANDALL S. MILLER & ASSOCIATES, P.C. MAY BE A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED MAY BE USED FOR THAT PURPOSE.  
 IF YOU ARE A MILITARY SERVICEMEMBER ON ACTIVE DUTY NOW OR IN THE PRIOR NINE MONTHS, PLEASE CONTACT OUR OFFICE.

Mortgage Sale - Default has been made in the conditions of a certain mortgage made by SYLVIA FORT AKA SYLVIA ROYSTER AKA SYLVIA R. FORT, A SINGLE WOMAN to Shore Mortgage, Mortgage, dated May 11, 2006, and recorded on June 1, 2006, in Liber 44806, Page 628, Wayne County Records, said mortgage was assigned to Deutsche Bank National Trust Company, as Indenture Trustee, for New Century Home Equity Loan Trust 2006-2 by an Assignment of Mortgage dated March 20, 2007 and recorded March 28, 2007 in Liber 46118, Page 755, on which mortgage there is claimed to be due at the date hereof the sum of One Hundred Twenty-Six Thousand Eight Hundred Thirty-Two and 07/100 (\$126,832.07) including interest at the rate of 4.25000% per annum.

Under the power of sale contained in said mortgage and the statute in such case made and provided, notice is hereby given that said mortgage will be foreclosed by a sale of the mortgaged premises, or some part of them, at public venue, at the place of holding the Circuit Court in said Wayne County, where the premises to be sold or some part of them are situated, at 11:00 AM on April 14, 2016. Said premises are situated in the Township of Sumpter, Wayne County, Michigan, and are described as: LOT(S) 3, MILOSCH ACRES SUBDIVISION, AS RECORDED IN LIBER 69, PAGE 51 of Plats, Wayne County Records. Commonly known as: 4521 WEAR RD, BELLEVILLE, MI 48111-0000

If the property is eventually sold at foreclosure sale, the redemption period will be 6.00 months from the date of sale unless the property is abandoned or used for agricultural purposes. If the property is determined abandoned in accordance with MCL 600.3241 and/or 600.3241a, the redemption period will be 30 days from the date of sale, or 15 days after statutory notice, whichever is later. If the property is presumed to be used for agricultural purposes prior to the date of the foreclosure sale pursuant to MCL 600.3240, the redemption period is 1 year.

Pursuant to MCL 600.3278, if the property is sold at a foreclosure sale, the borrower(s) will be held responsible to the person who buys the property at the mortgage foreclosure sale or to the mortgage holder for damaging the property during the redemption period.  
 TO ALL PURCHASERS: The foreclosing mortgage can rescind the sale. In that event, your damages are, if any, limited solely to the return of the bid amount tendered at sale, plus interest.

Dated: March 13, 2016  
 Randall S. Miller & Associates, P.C.,  
 Attorneys for Deutsche Bank National Trust Company, as Indenture Trustee, for New Century Home Equity Loan Trust 2006-2  
 4332 Woodward Avenue, Suite 180, Bloomfield Hills, MI 48302, (248) 335-9200  
 Case No. 13MI00517-2

## LEGAL NOTICES

**CITY OF TAYLOR**  
**NOTICE TO RESIDENTS**  
**PUBLIC HEARING ON CITY BUDGET**

TAKE NOTICE that a public hearing will be held in the City Council meeting room of the Taylor City Hall, First Floor, 23555 Goddard Road, Taylor, Michigan on Tuesday, April 19, 2016 at 7:00 p.m. for the purpose of reviewing the 2016-2017 City budget.

The property tax millage rate proposed to be levied to support the proposed budget will be a subject of this hearing.

A copy of the proposed budget will be on file after April 1, 2016 in the office of the City Clerk, 23555 Goddard Road, Taylor, Michigan for public examination prior to the public hearing. Additional copies of the proposed budget will also be available for public inspection at the Taylor Community Library, 12303 Pardee Road, Taylor, Michigan after April 1, 2016.

Cynthia A. Bower  
 City Clerk

**EPA Proposes Interim Plan to Cleanup Liquid Waste DSC McLouth Steel Gibraltar Plant Superfund Site Gibraltar, Michigan**

Comment Period: April 4 - May 3

U.S. Environmental Protection Agency, working with Michigan Department of Environmental Quality, is proposing a cleanup plan for hazardous levels of leachate in two landfills and their associated ponds at the DSC McLouth Steel Gibraltar Plant Superfund site.

EPA will make its plan final only after reviewing all comments. The proposed cleanup plan may be modified based on new information or public comments, so your opinion is important. To request a public meeting or for more information on this plan, contact Remedial Project Manager Demaree Collier by Friday, April 22.

Send your comments to Community Involvement Coordinator Teresa Jones before midnight, May 3.

Email to [jones.teresa@epa.gov](mailto:jones.teresa@epa.gov).  
 Fax to 312-692-2007.  
 Mail to Teresa Jones, EPA Region 5 (mail code SI-7J), 77 W. Jackson Blvd., Chicago, IL 60604.

More information is available at the Flat Rock Public Library, 25200 Gibraltar Road, and at [www.epa.gov/superfund/dscmclouth-steel-gibraltar](http://www.epa.gov/superfund/dscmclouth-steel-gibraltar). You may call EPA's Chicago regional office toll-free at 800-621-8431, 9:30 a.m. to 5:30 p.m., weekdays. For more information, contact:

Demaree Collier  
 Remedial Project Manager  
[collier.demaree@epa.gov](mailto:collier.demaree@epa.gov)  
 800-621-8431, Ext. 60214

Teresa Jones  
 Community Involvement Coordinator  
[jones.teresa@epa.gov](mailto:jones.teresa@epa.gov)  
 800-621-8431, Ext. 60725

Published April 3, 2016

**HELP WANTED FULL TIME**    **HELP WANTED FULL TIME**    **HELP WANTED FULL TIME**

**SUPER CARRIER**  
**NEEDED FOR THE PRESS AND GUIDE NEWSPAPER.**

Dearborn/Dearborn Heights area.  
 Adult with reliable transportation.

Delivery twice a week -  
 early morning  
 Wednesday and Saturday.

**120 Customers.**

**Please call Barb at (734) 246-0126.**  
**Please leave message.**