



Frequently Asked Questions McLouth Steel Cleanup

The U.S. Environmental Protection Agency and the Michigan Department of the Environment, Great Lakes, and Energy have answers to questions you may have about the McLouth Steel site. This document will be updated as needed; this version was created in April 2024.

Cleanup

1. Who currently owns the former McLouth Steel property?

In 2017, Wayne County acquired 183 acres of the 197-acre southern portion of the property through tax foreclosure. The County then entered into a Purchase and Development Agreement with Crown Enterprises, Inc., or Crown, who then formed MSC Land Co. LLC, or MSC, as part of the purchase. Neither EPA or EGLE were party to the Purchase and Development Agreement, available to review at: <https://semsub.epa.gov/work/05/939119.pdf>.

The remaining 14 acres not described above are owned by DSC. In addition, DTE Electric Co. has an easement of about 1.5 acres on Jefferson Ave.

2. Why is the property split into northern and southern portions?

The original 273-acre steel mill property was split between two sites, the first being the 197-acre McLouth Steel Corp. Superfund site (placed on the National Priorities List in 2019), and the other being the 76-acre Riverview Trenton Railroad site. The property was split as the portions of the facility are owned by different entities and therefore subject to different environmental laws. Cleanup activities associated with the northern portion are managed under the Resource Conservation and Recovery Act, or RCRA, whereas cleanup activities for the southern portion are managed under Superfund.

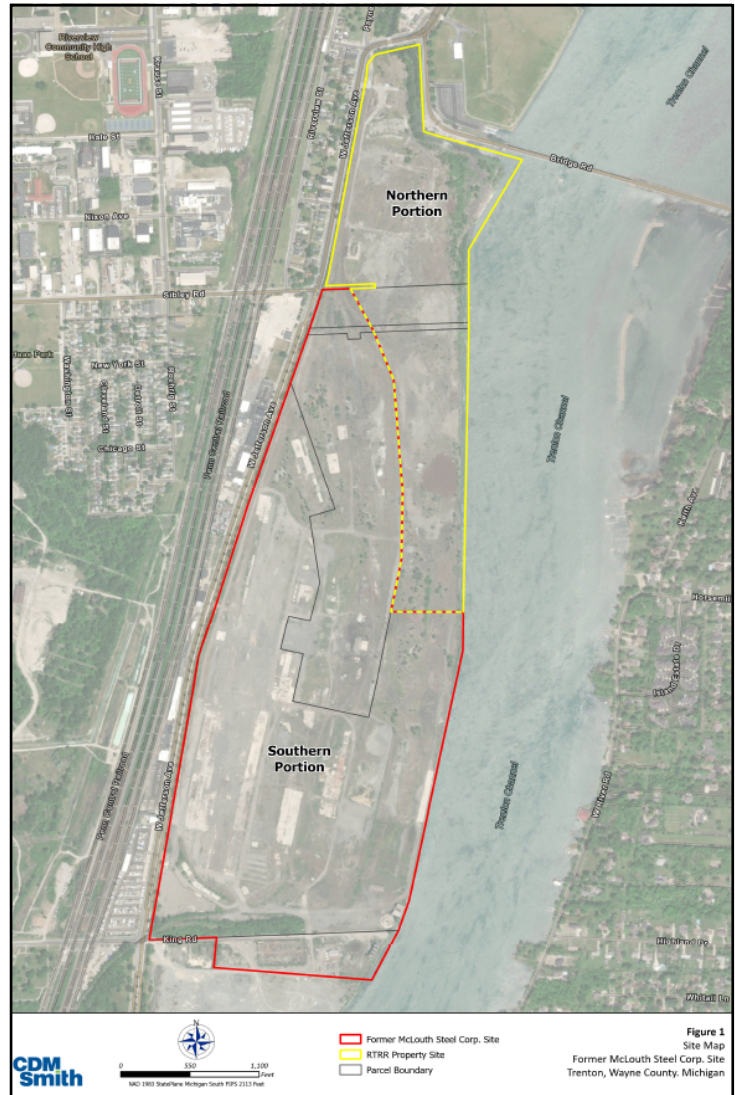
3. Who is involved in cleaning the property (both northern and southern portions)?

Under the terms of a 2018 Settlement Agreement with MSC, EPA, EGLE, and the U.S. Department of Justice, MSC performed specified environment cleanup work on the site. In exchange, Crown and MSC, parties not responsible for the contamination on the property (known as "non-labile parties"), clarified their environmental responsibilities and received covenants not-to-sue by the government.

The Riverview-Trenton Railroad Co., or RTRR, cleans areas in the northern portion. The southern portion will continue to be cleaned up through a mix of private and public funds. Some work has already been completed (*see question 4*); additional work will occur over the next few years. EPA and EGLE will ensure cleanup is done properly and redevelopment is done safely.

4. What cleanup has been completed so far?

The environmental remediation conducted by MSC included the removal of asbestos, waste, and polychlorinated biphenyls, or PCBs, prior to demolition; the installation/maintenance of a fence around the property; the demolition of approximately 45 structures; the removal of contaminated water and sludges from 23 pits, basements, and lagoons; and the assessment of stormwater management options.



MSC conducted additional environmental cleanup not required by the Settlement Agreement, including the demolition of four large stoves on the property. The cleanup included more than 100,000 labor hours and cost more than \$31 million. Total waste, in volume, removed from the property includes over 32,000 tons of solids and nearly three-million gallons of liquid.

EPA awarded a contract to CDM Smith in February 2023 to conduct the southern portion's Remedial Investigation and Feasibility Study, or RI/FS. A multimedia field investigation is ongoing. Soil sampling and monitoring well installation began in July 2023.

Environmental remediation conducted by RTRR on the northern portion included the groundwater investigation; the investigation of five Waste Management Units, or WMUs; the removal of a concrete pad and excavation of PCB-impacted soil at WMU-29; the assessment of stormwater management options; the implementation of a Dust Control Plan; and the investigation of a new area of interest.

5. Who is paying for the cleanup?

The southern portion's environmental cleanup work was conducted and paid for by MSC, with RTRR conducting work on the northern portion. Further cleanups conducted by EPA under the Superfund program will be funded using federal dollars. Cleanup for redevelopment purposes will be the responsibility of the property owner.

6. What is the contamination and where is it located? Is contamination going off the property into the river and surrounding areas?

Contamination identified during previous work in the northern and southern portions include PCBs, heavy metals, and calcium-hydroxide fill material. EPA and EGLE will work to prevent these contaminants from getting into the local environment's soil, air, and water. A Remedial Investigation is underway to obtain more information to better understand the locations of contamination and stop any possible migration from the area.

7. How will you ensure contamination does not spread during cleanup work?

Through a thorough site investigation, EPA is researching current site conditions and investigating any current or future pathways in which contamination could migrate or move off-site. As part of the cleanup work, EPA will develop plans to manage its activities to ensure that contamination does not spread.

8. What is being done to evaluate health concerns in the surrounding communities?

As EPA conducts its investigation of the site, staff will work with public health experts to define ways in which people may potentially be exposed to environmental hazards on-site. The Agency's findings will be shared in a Human Health Risk Management Report.

EPA will also work with the Michigan Department of Health and Human Services, or MDHHS, on a Public Health Assessment. A presentation on this Assessment is available on EGLE's webpage at: https://www.michigan.gov/documents/mdhhs/mclouth_steels_4-8-21_presentation_slides_727736_7.pdf.

9. Will local ordinances, like traffic and noise, be followed during the work? Will traffic change after the cleanup?

Local ordinances will be followed for the northern and southern portions of the former facility. Traffic patterns may change after the cleanup depending on the portion of the property's end use.



10. What will happen to the contaminated material and soil taken from the property? What has happened to the contaminated material taken so far?

All waste removed during building demolition was taken to approved licensed disposal facilities in Michigan, Ohio, and Alabama. For a detailed breakdown of what material went to each location, see MSC Land Company's Final Report, available at: <https://semspub.epa.gov/src/document/05/971639>.

Non-hazardous materials from the site were recycled or reused, including over 32,000 tons of steel, 72,500 tons of crushed concrete, slag, and construction brick, along with 70 refrigerant units and six non-PCB transformers.

Any remaining waste removed from the site will go to an approved licensed disposal facility.

11. Were there any violations or accidents during MSC's work?

EGLE issued MSC two notices of violation, or NOVs, during building demolition on the property. The first was issued in January 2019 due to improper handling of asbestos-containing materials. The second was issued in November 2019 due to visible emissions during the demolition of one of the site's asbestos-containing stoves. There were no other notable incidents such as accidents.

Timing

12. When will EPA start cleanup of the southern portion?

EPA began its Remedial Investigation in spring of 2023. This investigation includes the sampling of soil, groundwater, surface water, and sediment, which will determine what type, how much, and where contamination is located, assisting Agency staff in better understanding the ways in which people may be exposed to on-site contamination. The investigation is expected to take up to two years, after which EPA will publish a Remedial Investigation Report detailing its findings. A Human Health Risk Assessment Report, explaining potential health risks to people and the environment, will also be developed during this period.

Based on the findings of the Remedial Investigation, options to clean up or resolve pollution concerns will be presented in a Feasibility Study Report and a Proposed Plan in which EPA will recommend the steps Agency experts believe are the most effective to resolve site contamination. The site's Record of Decision, or final cleanup plan, is expected sometime in 2028.

Design of the cleanup will follow and can be expected to take up to two years to develop. After the design is finalized and construction begins, actions may take several years depending on what is planned (*see timeline on page 4*).

13. When will RTRR start cleanup of the northern portion?

Phase I work, which included establishing site conditions and minor cleanup of some former WMUs, was completed in 2021. EGLE is in the process of drafting a Phase II Corrective Action Consent Order, or CACO, to continue remediation. Work conducted under the Phase I CACO revealed the need for further investigations to define the contamination present.



14. When will all of the work be completed?

EPA Superfund cleanup on the southern portion will take several years, and work on the northern portion is expected to take a few more years, as well, as the facility owner and EGLE work through establishing obligations under a Phase II CACO.

15. Is the McLouth site part of the Monguagon Creek-Upper Trenton Channel remediation project with EPA's Great Lakes National Program Office, or GLNPO?

EPA's GLNPO and a non-Federal sponsor Bridgestone America Tire Operations, LLC, are developing a remedial design plan to address contaminated sediments in the lower 1,700 feet of Monguagon Creek as well as approximately 50 acres of the Trenton Channel. The design is expected to be finalized in 2024 with cleanup to follow. Construction is expected to begin in 2025.

The McLouth site is separate from GLNPO's project, therefore sediments on-site and extending south will be addressed as part of the Superfund cleanup.

Communication

16. Will there be meetings held with the municipalities and/or residents to update the progress of the work? How will the communities be involved?

As investigation and cleanup moves forward with the site, EPA will continue to work with the community as outlined in the site's Community Involvement Plan, available at: <https://sempub.epa.gov/work/05/949432.pdf>. This includes, at a minimum:

- Continuing meetings with the McLouth CAG;
- Hosting public meetings to review results and proposed cleanup plans;
- Sharing informational fact sheets with the community;
- Issuing press releases announcing important site milestones;
- Placing newspaper advertisements announcing formal public comment periods and site milestones; and
- Utilizing EPA Region 5's "Great Lakes" Facebook and X (formally known as Twitter) pages to announce updates and site milestones.

Future Formal Community Engagement Opportunities

Southern Portion

Public comment period held prior to selecting final cleanup plan for southern portion.

Public comment period held prior to delisting southern portion.

Northern Portion

Public comment period held prior to delisting northern portion.

Future Investigation and Cleanup Activities

Southern Portion

EPA investigates southern portion.

Final cleanup plan selected and southern portion cleaned up.

Northern Portion

RTRR investigates northern portion with oversight by EGLE.

RTRR cleans up northern portion under EGLE oversight.

Interim Measures & Outfall Investigations Workplan(s)

17. Can the public review technical and legal documents about McLouth Steel? Where are they located?

All documentation pertaining to EPA's role in the McLouth Steel Superfund site is available under webpage sections titled "Reports and Documents" and "Administrative Records", available at: www.epa.gov/superfund/mclouth-steel. Additionally, electronic versions of all referenced documents can be accessed at the site's Information Repository, located at the Trenton Veterans Memorial Library. Please ask a librarian for access. Note that if you are looking for a specific document, you may also contact the site's Community Involvement Coordinator, or CIC (see contact information on page 5).

Documentation pertaining to EGLE's role in the RTRR site is available under a webpage section titled "Corrective Actions", available at: www.michigan.gov/egle/about/organization/materials-management/hazardous-waste/liquid-industrial-byproducts/former-mclouth.

18. What is the role of a Community Advisory Group, or CAG?

A CAG is a self-supported group of affected parties surrounding a Superfund site. CAGs are formed at sites with complex, long-term remedies, designed to serve as a focal point for the exchange of information among community members and EPA, the state agency, as well as other pertinent agencies involved in the site's cleanup. A CAG's purpose is to provide a public forum for community members to present and discuss their concerns related to the Superfund process.

A CAG for the McLouth site formed in late 2019 in partnership with residents, business owners, Congressional offices and a professional facilitator, and regular meetings are open to the public with advance registration. An agenda for each meeting is sent out before the call and a formal meeting summary is provided afterward. These summaries can be reviewed on the McLouth Steel CAG webpage, available at: <http://mclouthsteelcag.org>.

19. Can the CAG apply for an EPA Technical Assistance Grant, or TAG?

Any group, including CAGs, may apply for a TAG if its members' health, economic wellbeing, or enjoyment of the environment is affected by a Superfund site. Municipalities or other government agencies are not eligible to receive TAGs, however, government officials may belong to a community group requesting a TAG. The group must be incorporated through the state as a registered nonprofit.

Only one site TAG can be awarded at a time. Initially, EPA will award up to \$50,000, but additional funds may be available throughout the project life-cycle. To obtain a TAG, the group contributes a matching share to the project which must equal at least 20% of the total cost. This match usually is not difficult to provide as most groups make their match donating volunteer hours and other "in-kind" services. TAGs cannot be used to duplicate field or laboratory work; they may only be used to review or interpret existing documents and activities conducted at the site. Contact the site's CIC (*contact information below*) if interested.

For More Information

If you have questions or comments on the McLouth Steel site, contact the staff members below, or visit EPA and EGLE online.

For technical questions:

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EGLE Project Manager (Northern Portion)
mckenna@chicago.gov | 517-643-5324

Megan Cynar

EGLE Project Manager (Southern Portion)
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For general questions:

Kirstin Safakas

EPA Community Involvement Coordinator
safakas.kirstin@epa.gov | 312-919-4621

Websites

Northern Portion:

<https://www.michigan.gov/egle/about/organization/materials-management/hazardous-waste/liquid-industrial-byproducts/former-mclouth>

Southern Portion:

www.epa.gov/superfund/mclouth-steel

20. Can the CAG meet without EPA or the facilitator being present?

Yes, the CAG is welcome to convene meetings outside of those attended by EPA or the facilitator. This may be helpful to discuss items about the site that EPA is not involved with or to discuss other topics entirely.

Restoration and Future Use

21. What will eventually be done with the property?

MSC will work with local municipalities, zoning boards, and building departments to secure approval for redevelopment. As defined by EPA and EGLE regulations, as long as any redevelopment is protective of human health and the environment, both agencies do not have a role in deciding a site's future use.

22. Will there be restrictions on types of activities or materials on the property in the future?

The property owner may begin developing the property as it chooses, subject to local zoning and planning regulations. The EPA's 2018 Settlement Agreement does include provisions on how redevelopment will occur and requirements for sampling and handling waste during this redevelopment, noting that it cannot negatively impact EPA's cleanup work. For more information about these provisions, see pages 18-21 of the Settlement Agreement, available at: <https://semspub.epa.gov/work/05/941447.pdf>.

23. Will native habitat be restored on the property once cleanup is done? What about along the river?

Habitat restoration is not covered by the Settlement Agreement. However, EPA notified the federal Natural Resources Trustees, a group of agencies that focus on restoration projects, to the work happening at the site.

