REGION 5
CHICAGO, IL 60604

June 12, 2024

Via Electronic Mail Only

Ms. Christopher Vandegrift (vandegriftcj@cdmsmith.com)
Senior Project Manager
CDM Smith
One Allegheny Square, Suite 200
Pittsburgh, PA 15212

RE: Operable Unit 1 Soils Technical Memorandum – Year 1
McLouth Steel Corporation Superfund Site – MID017422304 / A557
1491 West Jefferson Avenue, Trenton, Wayne County, Michigan

Dear Mr. Vandegrift:

The *Operable Unit 1 Soils Technical Memorandum – Year 1* (OU1 Tech Memo), prepared by CDM Smith (CDM) on behalf of the United States Environmental Protection Agency (EPA), presents the results of the soil investigation performed in 2023 at the McLouth Steel Corporation Superfund Site (Site). This project was a part of the EPA Design and Engineering Services (DES) Contract No. 68HE0318D0003, Task Order No. 68HE0523F0033. EPA, in collaboration with Michigan Department of Environment, Great Lakes, and Energy (EGLE), has completed its review of the OU1 Tech Memo. This review letter includes comments from EPA and comments for EGLE are provided as an enclosure to this letter.

Comments cite the page, section, and paragraph where an issue or question was noted. "Paragraph 1" refers to the first complete paragraph on a cited page; partial paragraphs carrying over from a previous page are referenced as "Paragraph 0" where applicable.

Comments

1. **Page 1, First Paragraph**: The OU1 Tech Memo states, "This technical memorandum contains data collected during the **December 2023** [bold added for emphasis] sampling event…" Soil sampling was conducted between August and September 2023, not December 2023. This must be corrected.

2. **Pages 1 and 2, Site Background**: References should be provided for the summary information provided in the OU1 Tech Memo. An associated reference list should be included as an attachment.

3. **Page1 (Second Paragraph) and Page 2 (Second Paragraph), Site Background**: The OU1 Tech Memo should say "Crown Enterprises, "**Inc**" rather than "Crown Enterprises, ILLC" and "Crown Enterprises, LLC.

4. **Page 2, Site Background, Second Paragraph**: MSC should be defined as MSC Land Company, LLC the first time it is listed. For example, the following sentence should have read "…provide the non-liable parties—Crown Enterprises, **Inc.** and its affiliate, MSC Land Company, LLC (MSC)—with covenants not to sue…"

5. **Page 2, Site Background, Second Paragraph**: The Michigan Department of Environmental Quality was already defined as MDEQ in the second paragraph of the Site Background on Page 1, so it does not need to be spelled out the second time.

6. **Page 2, Site Background, Second Paragraph**: Please add "United States" in front of "Department of Justice."

7. **Page 3, Operable Unit 1 Soil Investigation Activities**: Please better define or describe surface soil sampling and subsurface soil sampling since these terms are used throughout the OU1 Tech Memo.

8. **Page 3, Operable Unit 1 Soil Investigation Activities, Third Paragraph**: The memo indicates that "two samples were collected from Site soil piles." Are the locations of the two samples collected from Site soil piles identified on Figures? The legend of Figure 3 includes soil borings but does not include soil pile locations. Table 2 of the OU1/2 Quality Assurance Project Plan (QAPP) indicates that these are surface soil samples. The OU1 Tech Memo should indicate that these are surface soil samples if subsurface soil samples were not collected from the Site soil piles. The locations of soil pile samples must be included on the appropriate Site figure.

9. **Page 4, Data Validation**: The paragraph indicates that the data validation reports for per- and polyfluoroalkyl substances (PFAS) and dioxins/furans (D/F) were not available as the technical memorandum was being prepared. A statement should have been included that the pending PFAS and D/F data validation reports will be evaluated to ensure acceptability of the data and discussed in the Year 2 technical memoranda or in the Remedial Investigation Report.

10. **Page 3, Operable Unit 1 Soil Sample Results, Second Paragraph**: "Attachment B" should be in bold to be consistent with the style of the document.

11. **Page 8, Inorganics (Metals and Cynanide), Paragraph 0**: The OU1 Tech Memo states that "McLouth OU1 soil data were compared to typical background for Huron-Erie Glacial Lobe of southeast Michigan" from EGLE's *Soil Background and Use of the 2005 Michigan Background Soil Survey* (EGLE's Survey; revised January 2023).

    It would have been helpful to include a table of the Huron-Erie Glacial lobe background numbers in this section of the OU1 Tech Memo or to identify the table from the EGLE Survey that was used to gather "typical background." EPA did not identify the "expected" and "typical"

soil background numbers included in this section of the OU1 Tech Memo (i.e. 117 milligrams per kilograms (mg/kg) total chromium, 1,630 mg/kg manganese, etc) in EGLE's Survey. CDM must verify the background concentrations listed in the OU1 Tech Memo.

A discussion of the appropriateness of utilizing the Michigan's soil background concentrations, including characterizing the soil type, should have been included in the OU1 Tech Memo.

It should be noted in the OU1 Tech Memo that a site-specific background investigation has not been completed.

12. **Page 12, Findings – Distribution Relative to Former Site Features, Table 8**: The table presents the soil sample detections and exceedances distribution relative to former Site features. A figure showing the sample locations with relation to former Site features would assist with evaluating the findings. This would essentially be the existing Figure 2 with sample locations added.

13. **Pages 13 and 14, Recommendations, Bullets**: The OU1 Tech Memo indicates that additional soil borings will be proposed to evaluate the eight areas included in the bullets. Not all of the analytes detected above PALs were noted at each of these eight areas. For example, volatile organic compounds (VOCs; particularly tetrachloroethylene) was detected at RI-SB-16; polychlorinated biphenyls, semi-voltile organic compounds, and dioxin were also detected in boring RI-SB-23; VOCs and dioxin were also detected in boring RI-SB-25. Additional parameters than those listed in the bullets may be necessary to understand the full scope of the contamination.

14. **Page 14, Recommendations, Third Bullet on this page**: Boring **RB**-SB-23 should be **RI**-SB-23.

15. **Page 14, Recommendations, First Paragraph after Bullets**: The OU1 Tech Memo indicates that additional soil borings will be proposed to evaluate the eight areas included in the above bullets. It is not clear how these eight locations were selected when there are other areas with exceedances also above the project action limits (PALs). For example, polychlorinated biphenyls in soil borings RI-SB-11, SB-39, SB-40, …; aldrin in SB-08, total dioxins in SB-2, mercury in SB-14, ect… As noted in the OU1 Tech Memo, "further soil borings outside of these [eight] hot spot zones may be necessary to understand the full scope of contamination."

16. **Figures 4 through 19**: The Site figures do not include sample depth intervals, analytical results, and PALs. Thus, the reader must flip back-and-forth between the figures and the analytical data tables in Attachment B to determine contaminant distribution, thus inhibiting a time-efficient understanding of the nature and extent of contamination. Section 2.1.4 of the DES Statement of Work (SOW) states "Results of analysis shall be compared to applicable soil, groundwater and sediment screening criteria. Figures shall present the results of sampling and analysis in a readily understandable fashion compared to applicable screening criteria." During the weekly site status meeting held on January 26, 2024, EPA, EGLE, and CDM further discussed that the Technical Memorandum figures must include sampling results and applicable screening criteria. CDM should have included this data on the figures. During a weekly status meeting held on April 5, 2024, EPA, EGLE and CDM discussed that the OU1 Tech Memo figures did not include

analytical results despite this being listed in the DES SOW and being discussed in the prior weekly status meeting. Please update the figures such that they present the results of sampling and analysis in a readily understandable fashion compared to applicable screening criteria.

17. **Figures**: Geologic cross sections that define stratigraphy should be included in the OU1 Tech Memo.

18. **Attachment A, Field Documentation (Boring Logs and Equipment Calibration)**: The boring logs were not consistent with documentation procedures listed in Section 5.1.1 of CDM's Technical Standard Operating Procedure (SOP) 3-5 Lithologic Logging included in Appendix A of the approved OU1 OU2 QAPP. The logs included the monitoring well number but did not include the corresponding soil boring identification number/borehole number. Additionally, the boring logs did not include a sample interval column noting the samples taken and processed for the laboratory. The logs also did not include the sample numbers filled in at the appropriate depth. Complete boring logs that meet the requirements of SOP 3-5 must be included in the OU1 Tech Memo and the pending Remedial Investigation Report.

The above comments must be addressed in the Year Two OU1 investigations and/or the pending Year 2 technical memoranda or in the Remedial Investigation Report. If you have questions or require assistance, please contact me at (312) 353-6713 or green.nilia@epa.gov.

Sincerely,

Nilia Moberly Green
Digitally signed by Green, Nilia
Date: 2024.06.12 14:09:17 -05'00'

Nilia Moberly Green
Remedial Project Manager
Superfund & Emergency Management Division

Enclosure: The Michigan Department of Environment, Great Lakes, and Energy (EGLE) Comments on the Operable Unit (OU) 1 Soils Technical Memorandum Year 1, DSC McLouth Steel Trenton Plant Site (Superfund Site).

Cc (via email only):
Megan Cynar, Michigan EGLE (cynarm@michigan.gov)
Steven Kaiser, EPA Region 5 (kaiser.steven@epa.gov)
Greg Gehrig, EPA Region 5 (gehrig.greg@epa.gov)
Lance Haman, EPA Region 5 (haman.lance@epa.gov)

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING

GRETCHEN WHITMER
GOVERNOR

PHILLIP D. ROOS
DIRECTOR

May 7, 2024

VIA EMAIL

Nilia Moberly Green
Remedial Project Manager
United States Environmental Protection Agency, Region 5
Superfund & Emergency Management Division
77 West Jackson Boulevard, SR-6J
Chicago, Illinois 60604

Dear Nilia Moberly Green:

SUBJECT: The Michigan Department of Environment, Great Lakes, and Energy (EGLE) Comments on the Operable Unit (OU) 1 Soils Technical Memorandum Year 1, DSC McLouth Steel Trenton Plant Site (Superfund Site).

EGLE staff have completed their review of the OU1 Soils Technical Memorandum (Tech Memo), sent by the United States Environmental Protection Agency on April 1, 2024. This comment letter includes comments from the EGLE Project Manager below and comments from the EGLE Technical Support Unit geologist are provided as an attachment to this letter.

Specific Comments

1. Site Background, Second Paragraph. The Tech Memo states, “In 2000, DSC, Ltd. sold the 76-acre northern portion of the facility to Manuel J. Maroun, who transferred the title through Crown Enterprises, LLC to Riverview-Trenton Railroad Co.” EGLE suggests that parentheses be add as (RTRR site) after “facility”, make it clear that this portion is not part of the Superfund Site.

2. Site Background, Third Paragraph. It is not clear in this paragraph whether these activities took place on the Superfund Site or the RTRR Site or both. Please clarify where these activities occurred?

3. Site Background, Fourth Paragraph, last two sentences. It is not clear if the inorganics, volatile organic compounds, semi-volatile organic compounds, polychlorinated biphenyl, dioxins/furans, and per- and polyfluoroalkyl substances were identified on both sites. With the concerns with pooling water adjacent to the RTRR Site with elevated pH water, the Tech Memo should be clear if this is also a concern on the Superfund Site. Please specify where each compound

was found to better describe what contaminants are present on the Superfund Site.

4. Site Background, Fifth Paragraph. There is a typo in “Crown Enterprises, LLC”.

5. Pesticides. Double check the depths on the sample descriptions matches the depths on the tables.

6. Table 10. It appears there may be different font sizes. Please correct.

7. Figures. Review the dot colors on Figures 4 and 12. There are few dots on the figures that should be a different color based on the analytical results.

We appreciate the opportunity to review the OU1 Soils Technical Memorandum – Year 1 and provide comments. If you have any questions or concerns, please contact me at 517-256-2681, CynarM@Michigan.gov; or EGLE, Remediation and Redevelopment Division, P.O. Box 30426, Lansing, Michigan 48909-7926.

Sincerely,

Megan Cynar
Project Manager
517-256-2681

cc: Courtney Fung, EGLE
Matt Baltusis, EGLE

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

Technical Assessment Memorandum

TO: Megan Cynar, Project Manager
Superfund Section, Remediation & Redevelopment
Defense/Superfund Site Management and Administrative Unit

FROM: Matt Baltusis, Senior Geologist
Superfund Section, Remediation & Redevelopment
Technical Support Unit

DATE: May 3, 2024

SUBJECT: Comments to Operable Unit 1 Soils Technical Memorandum – Year 1
McLouth Steel Corp. Superfund Site, Trenton, Michigan

Introduction

Michigan Department of Environment, Great Lakes, and Energy (EGLE) has reviewed the document titled "Operable Unit 1 Soils Technical Memorandum – Year 1" (memorandum) prepared for United States Environmental Protection Agency (USEPA), Region 5, Superfund and Emergency Management Division prepared by CDM Smith dated March 28, 2024. The objective of the memorandum is to describe the sampling results of the soil investigation performed at the McLouth Steel Corp. Superfund Site (Site).

Comments:

1. Page 1 of the document, 1st paragraph.
   Please include the overall purpose of the sampling ("part of the remedial investigation work plan etc.").

2. Page 4 of the document, Data Validation.
   The text states "The data in this technical memorandum underwent data validation as described on QAPP Worksheets 34 through 36, except for PFAS and D/Fs. The data validation reports for those analytes were not available as this technical memorandum was being prepared. The preliminary analytical results for PFAS and D/F are presented herein as they are expected to be usable, but they should be considered preliminary and subject to data validation."
   Please indicate a process to (a) compare of preliminary results to validated results; (b) the level of difference between preliminary results and validated results; (c) determine if the the next steps in the investigation (determined by preliminary results) needs to be amended due to the validated results.

3. Page 12 of the document, Findings – Distribution Relative to Former Site Features.
   The sampling plan assumes the soil borings are located in the highest concentration of one or more remedial investigation analytes within a specific former plant's operation footprint so any detection of remedial investigation (RI) analytes above the project action limit is considered to be the highest concentration at each boring. Too few soil samples have been collected per former plant's operation footprints to make the determination of release magnitude. It is requested that the areas coincident of any detection of RI analytes be evaluated for further investigation since it is not known, nor has it been demonstrated that the\the soil sample was collected in an area representative of highest concentration of RI analytes (i.e., on the edge of a release area).

4. Page 12 of the document, Findings – Distribution Relative to Former Site Features, Table 10 - Soil Sample Detections and Exceedances – Distribution Relative to Former Site Features.
   Please provide a crosswalk table of the Waste Management Units (Environmental Strategies Corporation [ESC], 1999, Table 1), Areas of Interest (ESC, 1999, Table 2), Recognized Environmental Conditions (Environmental Consulting & Technology, Inc.[ECT], 2017) and Table 10 – Soil Sample Detections and Exceedances – Distribution Relative to Former Site Features. This will assist in tracking the areas identified in previous reports (PA, SI, etc.) to areas investigated during the RI.

5. Page 13, Recommendations.
   EGLE staff reviewed "Table F – Inorganic Detection Results" and was unable to fully determine how the eight areas of soil analytical result exceedances were determined. Please explain the rationale for selecting this data versus other soil analytical results from other borings.

6. Page 16, References. Please include the following references:
   a. Remedial Acquisition Framework: Design and Engineering Services. Final Quality Assurance Project Plan (QAPP), McLouth Steel Corp., Superfund Site, Operable Units 1 and 2, RI/Feasibility Study, Trenton, Michigan prepared for USEPA, Region 5, Superfund and Emergency Management Division prepared by CDM Smith dated July 21, 2023.
   b. Resource Conservation Recovery Act Facility Assessment Report, DSC LTD. – Trenton Plan, 1491 West Jefferson Avenue, Trenton, Michigan prepared for DSC LTD. prepared by ESC dated November 2, 1999.
   c. Phase 1 Environmental Site Assessment, Former McLouth Steel Facility, 1491 West Jefferson Avenue, Trenton, Michigan 48183 prepared for the City of Trenton by ECT dated August 8, 2017.

7. Attachment B
   Please indicate which Project Action Limit the analyte exceeds (i.e., drinking water protection criteria, ecological risk values, etc.).

This concludes my review, any questions please contact me.

cc: John Bradley, EGLE