



**REGION 5**  
CHICAGO, IL 60604

July 12, 2024

**Via Electronic Mail Only**

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

RE: Operable Unit 3 Sediment 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 3 Sediment Technical Memorandum – Year 1* (OU3 Tech Memo), prepared by CDM Smith (CDM) on behalf of the United States Environmental Protection Agency (EPA), presents the results of the groundwater 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 Superfund & Emergency Management Division (SEMD) and EPA Great Lakes National Program Office (GLNPO), in collaboration with Michigan Department of Environment, Great Lakes, and Energy (EGLE), has completed its review of the OU3 Tech Memo. This review letter includes comments from EPA and comments for EGLE are provided as an enclosure to this letter. The comments must be addressed in the Year Two OU3 investigations and/or the pending Year 2 technical memoranda or in the Remedial Investigation Report.

Comments cite the page, section, and paragraph where an issue or question was noted. “First Paragraph” refers to the first complete paragraph on a cited page.

**EPA GLNPO Comments**

1. **Page 1, Site Background, Second Paragraph:** The norther parcel (Riverview-Trenton Railroad [RTRR]) should be outlined in a figure since it is discussed specifically in the text. A figure would give additional context.
2. **Page 2, Monguagon Creek:** The pre-design investigation was completed in September 2021; however, the remedial design for contaminated sediment within Monguagon Creek and the

Trenton Channel along a portion of the northern parcel is on-going.

3. **Page 2, Hot Spots:** (Hot Spots 2 and 4) Sediment remediation of Monguagon Creek – Upper Trenton Channel project is now tentatively planned for 2027 due to disposal limitations.
4. **Page 2, Hot Spots:** (Hot Spot 3) The eastern side of the Trenton Channel is no longer being investigation and is determined for no further action for sediment remediation.
5. **Page 2, Hot Spots:** (Hot Spots 5 to 9) These hot spots are not identified in any figure or described in the text.
6. **Page 5, Operable Unit 3 Sediment Investigation Sampling Results, First Paragraph:** The last sentence states that historical navigation maintenance dredging (of both channels and harbors) may also have contributed to the lack of sediment in many of the areas. It is not apparent that this is an accurate claim if all sampling locations were not within the navigational dredging channel. The lack of sediments seems to mostly be attributed to the rapid current within the Trenton Channel.
7. **Page 20, Recommendations, First Paragraph:** The first/second sentence contradict. It states there is no trends found in the analytical data, then describes a general trend for the polycyclic aromatic hydrocarbon (PAH) data (increases as depth increases). It then continues saying other analytes show similar concentrations throughout the vertical profile. This statement should be revised or provided with additional detail to support the statement.
8. **Page 20, Recommendations, Bullets:** There are no specific comments on the proposed locations for future sampling. Future sampling should include locations to fill all data gaps.
9. **Page 20, Recommendations, Third Paragraph:** Sentence 3 states they will not conduct sampling to define a clean clay layer. EPA suggest tracking elevations at which sediment cores encounter clay as this is usually an indication of a native, potentially “minimally & surficially impacted” layer. Some areas within the project area may have sediment deep enough where a clay layer would not be encountered during normal sediment coring.

#### **EPA SEMD Comments**

10. **Page 1 Site Background, Second Paragraph and Figure 2 Site Layout:** The Site Background section indicates that OU 3 is on the western side of the Upper Trenton Channel, but Figure 2 incorrectly indicates that Operable Unit 3 extends all the way to Grosse Ile. This must be corrected in this figure and Figure 1 of the QAPP.
11. **Figure 2 Site Layout:** The scale bar is incorrect and must be corrected.
12. **Page 5, Surface Water Discharge Sampling:** The second sentence is incomplete and must be corrected.
13. **Page 5, Data Validation:** The paragraph indicates that the data validation reports for

dioxins/furans (D/Fs) and reactive sulfide and a portion of the PFAS results were not available as the technical memorandum was being prepared. A statement should have been included that the pending D/F, reactive sulfide, and PFAS 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.

14. **Page 7, Dioxins/Furans:** The first sentence indicates that 2,3,7,8-tetrachlorodibenzo-P-dioxin and total dioxin toxicity equivalent (TEQ) were the only D/Fs detected. Other dioxins, that do not have established project action limits (PALs), were also detected in sediments. This sentence must be corrected.
15. **Page 22:** Note that Table 1 through Table 12 are presented in the text of the OU3 Tech Memo. List each of the Attachment B analytical data tables (Tables A through Table I) on the index sheet.
16. **Table E – PFAS Detection Results:** In addition to the per- and polyfluoroalkyl substances (PFAS) analyte name and CAS Number, please include the associated abbreviations in future Tech Memos, QAPP updates, and the Remedial Investigation Report.
17. **Table E – PFAS Detection Results:** The PFAS analytes for sediment samples included in Table E of the OU3 Tech Memo do not align with the analytes included in “QAPP Worksheet #15j Sediment Screening Criteria – PFAS.” Future sampling must align with the scope outlined in the approved project Quality Assurance Project Plan (QAPP) to ensure that work performed will satisfy the site-specific data quality objectives.

The above comments must be addressed in the Year Two OU3 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](mailto:green.nilia@epa.gov).

Sincerely,

Nilia Moberly Green  
Remedial Project Manager  
Superfund & Emergency Management Division

Cc (via email only):

Megan Cynar, Michigan EGLE ([cynarm@michigan.gov](mailto:cynarm@michigan.gov))  
Amber Falkner, EPA Region 5 ([falkner.amber@epa.gov](mailto:falkner.amber@epa.gov))  
Steven Kaiser, EPA Region 5 ([kaiser.steven@epa.gov](mailto:kaiser.steven@epa.gov))  
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GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

June 20, 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 60604-3507

Dear Nilia Moberly Green:

**SUBJECT:** The Michigan Department of Environment, Great Lakes, and Energy (EGLE) Comments on the Operable Unit (OU) 3 Sediment Technical Memorandum Year 1; McLouth Steel Corp Site (Superfund Site).

EGLE staff have completed their review of the OU3 Sediment Technical Memorandum (Tech Memo), sent by the United States Environmental Protection Agency on May 22, 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. Surface Water Discharge Sampling, Second Sentence. This sentence does not seem complete and seems to be missing something. Please revise.
2. Surface Water Discharge Sampling, Fifth Sentence. "As of this technical memorandum, CDM Smith has not received the analytical results for these samples and will therefore evaluate and report *these* data as part of Year 2 reporting efforts." Please change "these" to "the".
3. Dioxins/Furans, Second Sentence. Change the sentence to the following, "Of the D/Fs analyzed, only 2,3,7,8-tetrachloroedibenzo-P-dioxin and total dioxin toxicity equivalence (TEQ) (for mammals) were detected *above the PAL*". As other compounds were detected, but a PAL was not established for them.
4. Recommendations. The bullets in this Section indicate areas that should be further characterized based on exceedances. Please provide all the exceedances used to make these recommendations on the results figures.

5. Table Index on Page 22. The title for Table 7 in this Index is not the same as the title for that table in the report. Please revise.
6. Figures 4a, 4b, and 4c. The title of these figures is "Sediment Sample Exceedances – Inorganics & PCB Aroclors; however not all of the exceedances are shown on the figures.
7. Figures 4a, 4b, and 4c do not contain lab notes, but Figures 5a, 5b, and 5c do contain the lab notes. Please add the lab notes to the Figure 4s to be consistent.
8. Figures 4a, 4b, 4c, 5a, 5b, and 5c. Please compare the results figures to the results table as there are several concentrations that do not match the concentration reported in the table and others that exceeded that are not bolded. Please make sure you are also consistent with decimal placement.

We appreciate the opportunity to review the OU3 Sediment 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

Attachment

cc: Courtney Fung, EGLE  
Matt Baltusis, EGLE


**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY**

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**Technical Assessment Memorandum**

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

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

DATE: June 17, 2024

SUBJECT: Comments to Operable Unit 3 Sediment 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 3 Sediment Technical Memorandum – Year 1” (memorandum) prepared for the U.S. Environmental Protection Agency (U.S. EPA), Region 5, Superfund and Emergency Management Division by CDM Smith dated May 22, 2024, received May 24, 2024. The objectives were to summarize sediment quality data collected during the October 2023 sampling event, characterize the nature, extent, concentrations of chemical contaminants in groundwater, and provide recommendations for additional site characterization, where appropriate.

**General Comments:**

None.

**Specific Comments:**

1. Page 2, Site Background, Monguagon Creek and Hot Spots.  
EGLE requests answers the following questions be inserted into the report:
  - a. Do these areas (Monguagon Creek and Hot Spots) impact the sediment analytical results?
    - i. If yes, what alternatives are necessary to account for the potential impacts?
    - ii. If no, what are the next steps?
2. Page 8, acid volatile sulfide (AVS)/simultaneously extracted metals-simultaneously extracted metals (SEM) [AVS/SEM] data collection.  
EGLE requests the following:

- a. Please include the following reference in the report: EPA. 2005, EPA. Procedures for the Derivation of Equilibrium Partitioning Sediment Benchmarks for the Protection of Benthic Organisms: Metal Mixtures (Cadmium, Copper, Lead, Nickel, Silver, and Zinc), EPA/600/R-02/011, Office of Research and Development.
  - b. The above reference (EPA, 2005) mentions AVS can vary with sediment depth and seasonality. The reference mentions collecting sediment samples from 0 to 2 centimeters and collect samples from November to May. EGLE requests how these recommendations will be used to interpret the AVS data collected and direct future AVS sampling.
3. Page 9, Table 8 – AVS/SEM Molar Concentration and Bioavailability Ratio Summary.  
EGLE requests the following:
  - a. Please include the calculations of the bioavailability ratio in the report.
  - b. Please state how the bioavailability ratio will be used for making remedial investigation decisions.
4. Attachment B, Table E – Per- and Polyfluoroalkyl Substances (PFAS) Detection Results.  
EGLE requests the EPA consider using the following reference to compare PFAS sediment sampling results to aquatic risk-based screening levels for wildlife: Final Report, Approach for Assessing PFAS Risk to Threatened and Endangered Species, Strategic Environmental Research and Development Program (SERDP) Project ER18-1653, March 2020, Craig Divine, Ph.D., et al. Department of Defense SERDP.