



May 5, 2026

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U.S. EPA Region 5
Ralph H. Metcalfe Federal Building
77 West Jackson Blvd
Chicago, Illinois 60604

PROJECT: Contract No.: 68HE0318D0003
Task Order No.: 68HE0523F0033

SUBJECT: Operable Unit 1 Soils Technical Memorandum – Year 2
McLouth Steel Corp. Superfund Site
Trenton, Michigan

Dear Ms. Green:

CDM Smith Federal Programs Corporation (CDM Smith) has reviewed the comments provided by the U.S. Environmental Protection Agency (EPA) and the Michigan Department of Environment, Great Lakes, and Energy (EGLE) on April 8, 2026, regarding the McLouth Steel Superfund Site, Operable Unit 1 Soils Technical Memorandum – Year 2 (TM). CDM Smith has revised the TM to address EPA Comments 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, and 32; EGLE Comments 1, 2, 3, 4 and 6 from the April 8, 2026 letter. The remaining comments will be addressed in the Remedial Investigation (RI) Report.

The following comments were addressed from the Operable Unit 1 Soils Technical Memorandum – Year 2 Review Comment Document:

1. EPA Comment #1, Pages 1 and 2, Site Background: As noted in EPA’s review of the OU1 Year 1 Tech Memo, references must be provided for the summary information provided in the OU1 Year 2 Tech Memo. The references must also be added to the reference list.

CDM Smith Response: The following was added to the beginning of the “Site Background” section, “The following site background is summarized from EPA’s statement of work (SOW), as amended on November 18, 2022 (EPA 2022):”. A reference to the SOW was also added to the reference section.

2. EPA Comment #2, Page 1, Site Background, Third paragraph: For clarity to the public, EPA recommends adding a footnote that in 2019, EGLE assumed all functions related to CERCLA for the State of Michigan and Michigan Department of Environmental Quality (MDEQ) effectively ceased to exist.

CDM Smith Response: A footnote was added at the first mention of MDEQ stating, “In 2019, EGLE assumed all functions related to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for the State of Michigan, and MDEQ effectively ceased to exist.”

3. EPA Comment #3, Page 2, Site Background, First Paragraph: EPA is unsure what “including the property” means in this sentence and whether it is necessary information.

CDM Smith Response: The phrase “including the property” was removed.

4. EPA Comment #4, Page 2, Site Background, Third Paragraph: Please switch the order of the last two sentences in the paragraph about the OU1 Year 1 Tech Memo

CDM Smith Response: The order of the sentences was switched.

5. EPA Comment #5, Page 3, Physical Setting, First Paragraph: EPA recommends removing the word “elevation” before “575 feet” in the first sentence and before “585 feet” in the second sentence. Please also spell out “El.” as elevation in the first sentence.

CDM Smith Response: The word “elevation” was removed from before “575 feet” and “585 feet.” Revised “(<El. 575)” to “(less than [<] 575 feet of elevation)” in the first sentence.

6. EPA Comment #6, Page 3, Physical Setting, First Paragraph: Please define NGVD88 as North American Vertical Datum of 1988.

CDM Smith Response: Defined NGVD88 as “North American Vertical Datum of 1988.”

7. EPA Comment #7, Page 3, Physical Setting, First Paragraph: Suggest editing the sentence to active tense – The changes to elevations document that fill is the predominant material encountered in borings above the bedrock.

CDM Smith Response: Updated the sentence to say, “The changes to elevations document that fill is the predominant material encountered in most borings above the bedrock.”

8. EPA Comment #8, Page 3, Physical Setting, Second Paragraph: No need to capitalize “Urban Fill” if not a proper name.

CDM Smith Response: “Urban Fill” is no longer capitalized within the document.

9. Page 3, Overburden Geology, Fourth Paragraph: The second sentence indicates that fat clay on site ranges from 2 to 23 feet, with several areas where the fat clay is limited or absent. Should this sentence be edited to say “zero to 23 feet” instead of “2 to 23 feet” if the clay was absent in several areas? Also need to specify that the range is thickness, as done fill in the first part of the sentence.

CDM Smith Response: Updated text to say “0 to 23 feet” to better reflect the current understanding of the on-site clay layer, based on all boring results from Year 1 and Year 2 field activities.

10. Page 4, Overburden Geology, First Paragraph: Suggest indicating that these are “borings RI-SB-29 and RI-SB-68.” Please do this throughout the memo.

CDM Smith Response: The first paragraph was revised to provide additional context regarding the borings collected during the Year 1 and Year 2 field programs. Additionally, it was specified that Borings RI-SB-29 and RI-SB-68 had limited or absent fat clay observed. Lastly, throughout the document, any time a specific Boring ID is mentioned (i.e., RI-SB-XX), “Boring” was added before the Boring ID for clarity to the reader.

11. Page 4, Operable Unit 1 Soil Investigation Activities, Fourth Paragraph: Please add August 13, 2024, as the date of the OU1 and OU2 Year 2 Scope of Work.

CDM Smith Response: The text was revised to include the date the scope of work was approved.

12. Page 4, Samples Collection, Review and Data Validation, Eight Paragraph: The first sentence incorrectly references the 2023, instead of the 2025, Quality Assurance Project Plan (QAPP). Update the first sentence to “EPA-approved Final Quality Assurance Project Plan – Year 2, Revision 1 (QAPP)(CDM Smith 2025).”

CDM Smith Response: The text now correctly references the 2025 QAPP, which is Year 2, Revision 1.

13. Page 5, Samples Collection, Review and Data Validation, Fourth Paragraph: EPA suggests editing the fourth sentence to “Decontamination water, including water and solutions used to clean field equipment, was....” since “decontamination water” is likely unfamiliar to many readers.

CDM Smith Response: The text is updated to say, “Decontamination water, including water and solutions used to clean field equipment, was. . .”

14. Page 5, Samples Collection, Review and Data Validation, Fourth Paragraph: To add clarity, EPA suggests editing the last sentence to “The contents of the frac tank were sampled by CDM Smith to determine appropriate disposal options.”

CDM Smith Response: The text is updated to state, “CDM Smith sampled the contents of the frac tank to determine appropriate disposal options.”

15. Page 6, PCB Aroclors, First Paragraph: Please define µg/kg as micrograms per kilogram since this is the first time used.

CDM Smith Response: µg/kg is now written out in the first paragraph of the “PCB Aroclors” section because it is not used again.

16. Page 9, Pesticides, First Paragraph: The bold “Figure” is missing the figure number, which is Figure 8.

CDM Smith Response: The text is updated to “Figure 8.”

17. Page 10, Dioxins/Furans, First Paragraph: For clarity, please revise the second sentence to the following if it correctly represents the data – 1,2,3,4,6,7,8-heptachlorodibenzo-p-dioxine and octachlorodibenzo-p-dioxin were the most consistently detected D/Fs, detected in 97% of the samples with D/F detections.

CDM Smith Response: The text is updated to say, “Of the D/F analyzed, 1,2,3,4,6,7,8-heptachlorodibenzo-p-dioxin and octachlorodibenzo-p-dioxin were the most consistently detected D/Fs, detected in 97% of the samples with D/F detections.”

18. Page 11, Inorganics (Metals and Cyanide), First Paragraph: The next to last sentence describes the area where the especially elevated levels of inorganics were detected. If discernable, please include statements about why results in these areas are elevated compared to other areas on-Site (i.e. are these areas near certain historical process areas?)

CDM Smith Response: Evaluation of potential sources and correlations to historical facility operations will be considered during the RI Report.

19. Page 12, Table 8, Background Soil Inorganics Concentration and Year 2 soil Inorganics Concentration: Please define mg/kg as micrograms per kilogram since this is the first time used.

*CDM Smith Response: mg/kg is now defined as milligrams per kilogram in the second paragraph after **Table 7b**.*

20. Pages 12 and 13, Table 8, Background Soil Inorganics Concentration and Year 2 soil Inorganics Concentration: The values in the second column are the arithmetic or geometric mean, nonparametric median values shown in Table 2 (2015 update) of EGLE's survey document for Huron-Erie glacial lobe topsoil in EGLE's Soil Background and Use of the 2005 Michigan Background Soil Survey (EGLE's Soil Survey; revised January 2023). This does not align with the Appendix A Flow Chart (Flow Chart) provided in EGLE's Soil Survey. According to the Flow Chart, the lesser of the following applies: A) Two standard deviations of the mean, for the appropriate soil type and glacial lobe (Table 2, 3, or 4); or B) The upper limit value in the Typical Range column (Table 1). Table 8 should be

updated to align with EGLE's Soil Survey. Additionally, the column heater in the OU1 Year 2 Tech Memo should be revised to specify that the values are from the 2015 Table 2 in EGLE's Soil Survey, not the 2005 Table 2. There are two Table 2s in EGLE's Soil Survey. Additionally, a discussion of the appropriateness of utilizing Michigan's soil background concentrations, including characterizing the soil type, should have been included in the OU1 Year 1 and Year 2 Tech Memos. Make sure concentrations are compared to appropriate soil type. Surface soils (referred to as topsoil in EGLE's Soil Survey) is defined differently throughout the OU1 Year 2 Tech Memo EGLE's Soil Survey states that an official EGLE determination is necessary in order to allow EGLE's background concentrations to apply for fill material. EGLE indicated that revisions to their Soil Survey are pending. CDM will still have to determine if the fill material found will allow for the use of EGLE's background concentrations.

CDM Smith Response: The table of background concentrations was removed from the memorandum. Text was added summarizing the approach in EPA's comment.

21. Page 13, Inorganics (Metals and Cyanide), First Paragraph: Delete the word "typical" from the second sentence. Instead refer to EGLE's State and Regional soil background values.

CDM Smith Response: The word "typical" was deleted.

22. Page 13, Inorganics (Metals and Cyanide), Fifth Paragraph: The word "expected" is not appropriate in the last sentence of the paragraph and should be deleted.

CDM Smith Response: The word "expected" was deleted from the text in the second paragraph of Page 13.

23. Page 15, Per- and Polyfluoroalkyl Substances, First Paragraph: Please delete "all" from the first sentence since it is implied.

CDM Smith Response: The word "all" was deleted from the first sentence of the "Per- and Polyfluoroalkyl Substances" section.

24. Page 15, Per- and Polyfluoroalkyl Substances, First Paragraph: Please define the acronym for perfluorodecanoic acid (PFDA) in the second sentence, instead of the third sentence since this is the first time it is referenced.

CDM Smith Response: The definition of perfluorodecanoic acid was moved to the first instance of it in this paragraph.

25. Page 16, Findings and Recommendations, First Paragraph: EPA recommends adding a footnote to the third sentence detailing why the results for boring RI-SB-16 were rejected (i.e. what was the poor quality control issue?). EPA did a word search for "reject" and "rejected" in this document and the OU1 Year 1 Tech Memo, and this is the only instance it was used. So, it is unclear why the data was rejected.

CDM Smith Response: The following clarification was added to the third sentence of the first paragraph, "Integrating the Year 1 and Year 2 results indicates that the area near Boring RI-SB-16—where the Year 1 soil results were rejected because of internal standard or surrogate recoveries outside of laboratory quality control criteria and are not usable—is contaminated with various VOCs, SVOCs, PCBs, and inorganics." Additionally, in the Sample Collection, Review and Data Validation section, a statement was added noting CDM Smith is aware of other rejected results, and a data usability assessment will be included in the RI Report.

26. Page 20, Figure 1 Site Layout: The scale bar is incorrect and must be corrected. This has been noted by EPA in its review of many of CDM's documents. Please check this prior to any future submittals.

CDM Smith Response: Figure 2, Site Layout, has been revised to have the correct scale bar.

27. Tables 3a & 3b through Tables 9a & 9b: It would be nice visually if the columns lined up in both the a. and b. tables, especially when on the same page.

CDM Smith Response: The columns for Tables 3a and 3b through Tables 8a and 8b (formerly Tables 9a and 9b) have been reformatted to line up with one another, respectively.

28. Tables 3a, 4a, and 7a: Why is the total number of samples (shown in last column of each table) not consistent for all volatile organic compound (Table 3a), semi-volatile organic compound (Table 4a), and inorganic analytes (Table 7a) in Year 1?

CDM Smith Response: Tables 3a and 4a are updated to reflect updated Year 1 data. Table 7a was left as is. The total count discrepancy is due to rejected values.

29. Pages 23-29, Figures 5 through 10: Tables should be updated to include a column for date sampled.

CDM Smith Response: Refer to Attachment B of the memorandum for sampling dates.

30. Pages 23-29, Figures 5 through 10: Figures 5-10 include Year 1 and Year 2 analytical results tables, but there are no visual connections of the results to the sample locations or colors indicating exceedances of screening criteria, including no isoconcentrations. As discussed during a 01/21/2026 meeting regarding the format of figures in the pending OU1 Year 2 Technical Memo, figures must present the results in a readily understandable fashion compared to applicable screening criteria. The color of the boring locations on the figures denotes whether the borings were advanced in Year 1 or Year 2. As noted during our meeting, it would be more helpful if the colors represented the level of contamination at each location. Readers are unable to interpret the data sufficiently to develop a conceptual site model without appropriate figures. This topic has been discussed many times and noted in prior review letters. Please update the figures so they present the results of sampling and analysis in a readily understandable fashion compared to the applicable screening criteria.

CDM Smith Response: CDM Smith does note that values that exceed the PAL are shaded yellow and bolded on the figures. Revisions to figures displaying analyte distributions will be addressed during the RI Report.

31. Page 23, Figure 5 Distribution of PCBs: This figure does not include all of the arachnids that were detected above the PAL (i.e. arachnids 1242 and 1268). All contaminants of potential concern (COPC) detected above the PALs should have been represented on Site figures in order to understand contaminant distribution. Please update all Site figures to include all COPCs above their respective PALs.

CDM Smith Response: Select analytes we displayed in the figure are based on Year 2 results. The RI Report will provide detailed figures of contaminants of potential concern.

32. General comment: Comment #8 of EPA's review of the OU1 Year 1 Tech Memo requested clarification about two samples were collected from Site soil piles and that the locations must be included on the appropriate Site figures. This information was not provided in the OU2 Year 2 Tech Memo. This information must be provided in a revised OU1 Year 2 Tech Memo and/or the Remedial Investigation Report

CDM Smith Response: Figure 3 has been updated to include the Year 1 waste pile sampling locations.

EGLE Comments:

1. Page 3, Physical Settings, Site Soils, Paragraph 3: EGLE staff recommends removing the word "elevation" before "575 feet" in sentence one and "585 feet" in sentence two.

CDM Smith Response: See response to EPA Comment #5

2. Page 9, Pesticides: EGLE staff notes that in the fifth sentence the figure reference is missing a figure number.

CDM Smith Response: See response to EPA Comment #16

3. Page 15, Findings and Recommendations: In the third sentence it states in parentheses that surface soil is “0 to 2 feet below ground surface” and subsurface depths “>2 feet below ground surface”; however, previously in Samples Collection, Review and Data Validation, Paragraph two second sentence it states “with surface being defined as 0 to 0.5 feet below ground surface, and subsurface samples being defined as anything deeper than 0.5 feet below ground surface”. Please correct this discrepancy throughout the Report.

CDM Smith Response: The text has been clarified that the surface soil interval is 0 to 0.5 foot below ground surface. Additional specificity has been added to the PCB Aroclors Section clarifying that, “Year 2 detections were mainly found in the surface soils and the 1- to 2-foot below ground surface interval, . . .”.

4. Page 16, Findings and Recommendations, Paragraph five: EGLE staff notes a word seems to be missing in sentence two (“RI-SB-16, RI-SB-25, and RI-SB-32, all of exhibited high contamination”).

CDM Smith Response: Sentence is updated to fix this issue: “RI-SB-16, RI-SB-25, and RI-SB-32, all of which exhibited high contamination.”

5. Figure 6, Distribution of VOCs: EGLE staff notes the results reported for RI-SB-35 9-10 appear to be from the “ME” sample; however, sample results from other “ME” samples were not shown in the figure even if they exceeded. Further EGLE notes the meaning of “ME” is not provided in the tables. According to CDM Smith this notation is related to the results being medium level analysis after dilution. Please verify the sample in Figure 6 reported is accurate and add the meaning of “ME” to the tables.

CDM Smith Response: In the third paragraph of the Sample Collection, Review and Data Validation section a statement the following has been added to explain what the “ME” denoted samples mean, “In some instances, CLP laboratories performed medium level volatile organic analyses on select rejected samples. These analytical results are denoted with “ME” in the sample IDs.”. Revisions to figures displaying analyte distributions will be addressed during the RI Report.

6. Figure 10, Distribution of Inorganics: EGLE staff notes the results for RI-SB-44, RI-SB51, and RI-SB-59 do not match the results reported in the analytical tables.

CDM Smith Response: Figure 10 has been revised to correct the result discrepancies across the borings and their respective intervals.

General Comments:

1. Year 2 Boring Logs and Tables: EGLE staff notes several of the sample locations shown on the boring logs do not match the sample ID in the analytical tables. Specifically, RI-SB56, RI-SB-67, RI-SB-68, RI-MW/SB-44, RI-MW/SB-46, RI-MW/SB-48, RI-MW/SB-49, RIMW/SB-59, RI-MW/SB-61, and RI-MW/SB-75.

CDM Smith Response: The boring logs in Attachment A are combined for both the soil borings and the associated monitoring wells when applicable (for both OU1 and OU2 investigations). The boring logs/well construction details will be revised in the RI Report to reflect the respective boring and monitoring well IDs separately in the title block.



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2. Figures with Analytical: EGLE staff notes there are several exceedances of Volatile Organic Compounds, Semi-Volatile Organic Compounds, Polychlorinated biphenyls, pesticides, dioxin/furans, and inorganics that are not shown on Figures 5 through 10. EGLE staff recommends a note be added to the figures to indicate not all exceedances are displayed on the figures.

CDM Smith Response: Revisions to figures displaying analyte distributions will be addressed during the RI Report.

If you have any questions regarding this submittal, please contact me at your earliest convenience at (412) 208-2429 or vandegriftcj@cdmsmith.com.

Very truly yours,

A handwritten signature in black ink, appearing to read "Chris Vandegrift".

Christopher Vandegrift, PE, PMP
Senior Project Manager
CDM Federal Programs Corporation

cc: Dominic Giaudrone, CDM Smith
Ernest Ashley, CDM Smith
James Morrison, CDM Smith