

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
MCLOUTH STEEL - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #2  
MCLOUTH STEEL  
A557\_01  
Trenton, MI  
Latitude: 42.1699480 Longitude: -83.1696370

**To:**  
**From:** Brian Kelly, OSC  
**Date:** 4/17/2019

**Reporting Period:**

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	A557_01	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>		<b>Start Date:</b>	1/2/2019
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	YES
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### Incident Category

Privately Funded CERCLA Cleanup

#### Site Description and Location

The former McLouth Steel facility originally consisted of 273 acres and operated from 1950 until 1995. In 1995, McLouth filed for bankruptcy. In 1996, the McLouth bankruptcy estate sold the McLouth facility to DSC. DSC tried without success to restart steel operations. In 2000, DSC sold the 76-acre northern portion of the facility to the Riverview-Trenton Railroad Co.

In 2017, Wayne County acquired 183 acres of the 197-acre southern portion through tax foreclosure. Wayne County then entered into a Purchase and Development Agreement with Crown Enterprises/MSc.

On August 6, 2018, Crown/MSc entered into a Settlement Agreement with EPA, MDEQ, and DOJ. The settlement will foster redevelopment by allowing MSc and Crown to clarify their cleanup responsibilities while EPA investigates and later fully addresses existing contamination within the property. The steps to be taken by MSc include:

- Demolish of 45 structures.
- Removing asbestos-containing material, containerized wastes, and materials containing PCBs from all structures before demolition,
- Installing a fence around the property,
- Removing contaminated water and sludges from 23 subsurface structures,
- Investigate five areas where PCBs may have been released, and
- Assessing and reporting on options for stormwater management.

The southern portion is scheduled to be listed on the NPL.

The northern portion will be addressed under a Corrective Action Consent Order between MDEQ and Riverview-Trenton Railroad Co.

#### Preliminary Removal Assessment/Removal Site Inspection Results

Multiple environmental reports were issued between 1999-2017. The most recent report issued by ECT Environmental Consulting & Technology, Inc. identified 134 Recognized Environmental Conditions including abandoned debris piles, machinery and equipment, hazardous material storage piles, waste treatment process piles, and other industrial equipment. Many of these identified conditions were located within the southern portion.

More information about the McLouth cleanup can be found at [www.epa.gov/superfund/mclouth-steel](http://www.epa.gov/superfund/mclouth-steel)

## 2. Current Activities

### 2.1 Operations Section

#### Narrative

In December 2018, EPA approved plans submitted by MSc including Dust Control Plan, Liquid and Sludge Removal Plan, PCB Investigation Plan, Site Security Plan Storm Water Management Plan, and Traffic Control Plan.

Site work started in December 2018 and is ongoing. Work is expected to be completed under the settlement by 2022.

Work on the NPL is expected to continue through 2033.

### **Community Involvement**

During the weeks of March 25 and April 8, 2019, EPA and MDEQ met with community members to discuss a Community Involvement Plan (CIP). Residents expressed both concerns about the redevelopment and cleanup and excitement about the jobs and economic growth. A draft of the CIP should be available this summer.

### **Work Completed**

Area 4 – Transformer preparation for off-site disposal  
Area 6 – Asbestos abatement continues – 90% (excluding galbestos)  
Area 7 – Asbestos abatement complete – 100% (excluding galbestos)  
Area 9 – Wrapping ACM insulated piping with plastic to abate – 100%  
Area 9 – Concrete support pillar demolition – 85%  
Area 15 – Sinter Building demolition – 95%  
Area 16 – Concrete support pillar demolition – 90%  
Area 16 – Lime Storage Bin demolition – 70%  
Area 17 – Asbestos abatement – 100% (excluding galbestos)  
Area 17 – Galbestos removal and demolition – 35%  
Area 18 – Asbestos abatement activities – 100%  
Area 18 – Railroad Transfer Building demolition began – 15%  
m) Area 21 – Asbestos abatement activities complete – 100% (excluding galbestos)  
Area 21 – Payroll Building demolition complete – 100%  
Area 22 – Asbestos abatement activities – 100% (excluding galbestos)  
Area 22 - Buildings A and B demolition – 100%  
15 Transformers (Trans# 11, 13, 17, 18, 19, 19A, 28, 29, 30, 35, 36, 72, 73, 113, #6 Furnace) shipped off-site for disposal  
Association of General Contractors courtesy safety audit completed  
Storm water retention berm construction – 100%  
Silt fence construction – 100%  
MIOSHA courtesy health and safety audit completed

### **Sampling**

- o Perimeter Dust Monitoring exceeded the NAAQS standard on March 8th, 20th, 21st, and 28th.  
On each of these days the frequency of work site wetting was increased to reduce particulate matter.
- o Real-Time Dust Monitoring was conducted March 1 – 29, Mon. – Fri.  
Exceedances were addressed through engineering controls and re-monitoring  
Common control measures included:
  - Reduction of work speed to reduce the quantity of dust produced
  - Applying water to surface areas
- o Manganese Sampling occurred on March 8th, 15th, 22nd, and 28th  
Sampling analyses showed no exceedances
- o Waste Characterization Analyses
  - WMU 15 Wastewater Treatment Plant (several locations)
    - East Clarifier
    - West Clarifier
    - Blue Clarifier
    - Thickener
  - WMU 43 Concast Grit Basin

## **2.2 Planning Section**

### **Planned Activities Next 30-Days**

Area 5 – Galbestos removal and building demolition  
Area 6 – Building demolition  
Area 7 – Galbestos removal and outbuilding demolition  
Area 8 – Bag House and associated cinder block building demolition  
Area 9 – Remove wrapped piping from pipe rack and dispose  
Area 16 – Lime storage bin demolition continues  
Area 16 - Remnant concrete pillar demolition continues  
Area 17 – Galbestos removal and demolition continues  
Area 18 – Railroad transfer building demolition continues  
Area 20 – Labor building historic mercury release remediation  
Area 20 – Labor Building demolition begins  
Area 22 – Buildings A, B, and C demolition – 100%  
Submit sampling notifications for: WMU 1 (Sedimentation Basin), WMU 2 (Oil Processing Tank), and WMU 42 (Concast Scale Pit)  
Step-down and large transformers scheduled for shipping  
Continue asphalt milling delivery

### **Issues**

National listing of Superfund sites was delayed from April to May, 2019.

## **2.3 Logistics Section**

No information available at this time.

## **2.4 Finance Section**

No information available at this time.

## **2.5 Other Command Staff**

No information available at this time.

**3. Participating Entities**

No information available at this time.

**4. Personnel On Site**

No information available at this time.

**5. Definition of Terms**

CACO - State of Michigan Corrective Action Consent Order

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act, known also as Superfund

NPL - National Priorities List

PCBs - Polychlorinated biphenyls (a group of manmade chemicals)

**6. Additional sources of information**

No information available at this time.

**7. Situational Reference Materials**

No information available at this time.