

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

948908



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #7
MCLOUTH STEEL
A557_01
Trenton, MI
Latitude: 42.1699480 Longitude: -83.1696370

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From: Brian Kelly, OSC

Date: 10/2/2019

Reporting Period:

1. Introduction

1.1 Background

Site Number:	A557_01	Contract Number:	
D.O. Number:		Action Memo Date:	6/5/2018
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	
Mobilization Date:		Start Date:	1/2/2019
Demob Date:		Completion Date:	
CERCLIS ID:	MID017422304	RCRIS ID:	
ERNS No.:		State Notification:	YES
FPN#:		Reimbursable Account #:	

Incident Category

Site Description and Location

The former McLouth Steel facility originally consisted of about 273 acres and operated from around 1950 until 1995. In 1995, McLouth filed for bankruptcy. In 1996, the McLouth bankruptcy estate sold the McLouth facility to Hamlin Holdings, Inc., which transferred title to Detroit Steel Co. Ltd., or DSC. DSC tried without success to restart steel operations. In 2000, DSC sold the 76-acre northern portion of the facility to Crown Enterprises, Inc. who then transferred title to Riverview-Trenton Railroad Company (or RTRR). The Michigan Department of Environment, Great Lakes, and Energy (EGLE) is overseeing the investigation and cleanup of the northern portion of the site.

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. Crown transferred title to MSC Land Company, LLC. The remaining 14 approximate acres are owned by DSC.

Under the terms of the Purchase Agreement between Wayne County and MSC, MSC is required to invest \$20,000,000 in two phases to demolish structures and construct an industrial development. The Purchase Agreement says under no circumstance will the development include the storage or processing of petroleum coke.

Under a separate agreement called an Administrative Settlement Agreement and Covenant Not to Sue (Settlement Agreement) between MSC and EPA, EGLE, and the U.S. Department of Justice, MSC and Crown, parties not responsible for contamination on the property (non-labile parties) received covenants not to sue. To secure the covenants, the Settlement Agreement requires MSC to do the following work in the southern portion of the site:

- Demolish about 45 structures,
- Remove asbestos-containing material, wastes, and PCBs, from all structures before demolition,
- Install a fence around the property,
- Remove water and sludges from 23 subsurface structures,
- Investigate five areas where PCBs may have been released, and
- Assess and report on options for stormwater management to eliminate uncontrolled flow to the Detroit River.

On May 13, 2019, the southern portion was listed on the Superfund National Priorities List (NPL).

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

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. Settlement work is expected to be completed next year.

NPL work is expected to continue through 2033.

Community Involvement Update

The draft Community Involvement Plan was released and is available on EPA's website. EPA updated the Trenton City Council on September 16.

Surface Water Control

A berm has been installed along the riverfront to prevent surface water run-off to the river.

Disposal and/or Reuse

Type of Waste	Monthly Total	Cumulative
Friable ACM:	120 Yards (4 Truck Load)	2,420 Yards (66 Truck Loads)
Galbestos Siding:	203.69 Tons	2,926.58 Tons
Const. & Demo Debris:	1,853.93 Tons	11,650.33 Tons
PCB Transformers:	0 Tons (0 Transformers)	315.2 Tons (49 Transformers)
Liquid Waste:	329,784 Gallons	2,153,583 Gallons
Freon/Refrigerant Units:	6 units drained, recycled	70 units drained, recycled
K061 Hazardous Waste:	0 Vac/Roll-off Boxes	8 Vac/roll-off Boxes
K062 Liquid Waste:	0 Gallons	44,010 Gallons
K062 Solid Waste:	10 Cubic Yards	30 Cubic Yards

Work Progress Update

- Area 2 – Washhouse Bldg #2 – building demolition – 85%
- Area 4A – B7- B10- Removal of Solids for offsite disposal, and backfill – 100%
- Area 4A – Loading out of scrap
- Area 4A – B – 18 (Downcoiler Pit) – Removal of liquids and backfill – 100%
- Area 4A – WMU 49 (Downcoiler Sump) – Removal of liquids into frac tank, cleaning, closure sampling, and backfill – 100%
- Area 4A – WMU 8 – Cleaning, closure sampling, and demolition of secondary containment – 100%
- Area 4A - WMU 51– Removal of sludge for off-site disposal, cleaning, and closure sampling – 100%
- Area 4A - WMU 51(Six Stand Oil Basement Sumps)- Removal of equipment – 15%
- Area 4A – WMU 52 (Finish Stand Scale Pit) –Liquids used for dust control
- Area 4A – WMU 55 – Removal of liquids and sludge for offsite disposal, cleaning, closure sampling, and backfill – 100%
- Area 4A – AOC 60a (South Motor Room) – Sampling of debris piles – 100%
- Area 4A – Galbestos removal and demolition – 50%
- Area 4A –Sheering of iron and breaking of concrete knee walls
- Area 4A/ 4B – Removal of light bulbs – 100%
- Area 4A/C – Loading out of scrap iron for salvage

- Area 4B- WMU-53 (Roughing Mill Scale Pit) – Sludge removal, cleaning, and closure sampling – 100%
- Area 4B – B -14 (Electrical Room Basement) -Liquids removed for off-site disposal – 50%
- Area 4C - Breaking of concrete and magging of iron
- Area 4C – Galbestos removal and demolition – 38%
- Area 4C - Sheering and magging of iron
- Area 12 – Loading out debris for off-site disposal
- Area 13 – Area preparation for tipping of stoves – 50%
- Area 14 – River Pump House - Asbestos abatement of piping, and transite removal – 100%
- Area 15 – Breaking concrete
- Area16 –Lime used for solidification in WMU 1(Sedimentation Basin) – 100%
- Area 17 - WMU 23 (Former BOF Gas Cleaning Sludge Pit)– Hauling Waste (roll off boxes) off-site for disposal – 100%
- Area 17 – WMU 23 (Former BOF Gas Cleaning Sludge Pit) – Removal of liquids for dust control
- Area 18 – REC 4-2 - Removal of liquids for dust control – 100%
- Area 22 – B-71 (Oil-Water Separator – North) – Liquids removed, and backfill – 100%
- Area 23 - WMU 1 (Sedimentation Basin) – Sedimentation Basin - skimming oil from surface
- Area 23 – WMU 1 (Sedimentation Basin) – Backfilling of Basin – 50%
- Area 25 – A8 (Concast Tunnels) Millings placed in concast fingers for isolation
- Area 25 – WMU 42 (Concast Scale Pit) – Removal of liquids for dust control complete – 85%
- Site clean-up and house keeping

ANALYTICAL DATA RECEIVED

Air Monitoring

- o Perimeter Dust Monitoring - no exceedances.
- o Real-Time Dust Monitoring - 3 exceedances. Dust suppression was in use. Readings taken directly after were below action levels.
- o Manganese (Mn) Sampling - no exceedances.

Waste Characterization Analyses

- o WMU-1(Sedimentation Basin)
- o WMU-2 (Oil Processing Tank) Sludge
- o WMU-23 (Former BOF Gas Cleaning Sludge Pit) North Chamber
- o WMU-43 (Concast Grit Basin)
- o WMU-49N (Downcoiler Sumps)
- o WMU-49S (Downcoiler Sumps)
- o WMU-53 N (Roughing Mill Scale Pit)
- o WMU-53 S (Roughing Mill Scale Pit)
- o WMU-53 (Roughing Mill Scale Pit) Bottom Solid
- o Mineral Oil - Pennsylvania Transformer
- o Mineral Oil - Niagra Transformer

Other Activities

None

2.2 Planning Section

Planned Work

- Area 4A – Coil Storage Bay Galbestos siding and roofing
- Area 4A – WMU 51(Six Stand Oil Basement Sumps) – Cleaning bolts in preparation for equipment removal
- Area 4A – WMU 54 (Old Four High Scale Pit) – Removal of liquids and sludges, cleaning, sampling in preparation of backfilling
- Area 4C –Sheering of Iron
- Area 13 – Preparation of area for tipping and demolition
- Area 14 – South Guard Shack universal waste removal
- Area 23 – WMU 1 (Sedimentation Basin) – Backfilling of Sedimentation Basin
- General Housekeeping and Final Cleaning
- Equipment Maintenance

Issues

None

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

ACM - Asbestos Containing Material
 ATSDR -Agency for Toxic Substances and Disease Registry
 CACO - State of Michigan Corrective Action Consent Order
 CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act, known also as Superfund
 CIP - Community Involvement Plan
 EGLE - Environment, Great Lakes & Energy - State of Michigan
 K061 - Listed Waste: emission control dust
 K062 - Listed Waste: spent pickle liquor
 mg/m3 - Milligram per cubic meter
 MRL - Minimum Risk Level

NAAQS - National Ambient Air Quality Standards
NPL - National Priorities List
PCBs - Polychlorinated biphenyls (a group of manmade chemicals)
PM2.5 - Particulate matter 2.5 micrometers or less in diameter
PM10 - Particulate matter 10 micrometers or less in diameter
POLREP - Pollution Report
SitRep - Situation Report
TPM - Total Particulate Matter
ug/m3 - Micrograms per cubic meter
WMU - Waste Management Unit

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.