

"Where the river's edge is just the beginning"- Trenton motto by Wendy Pate

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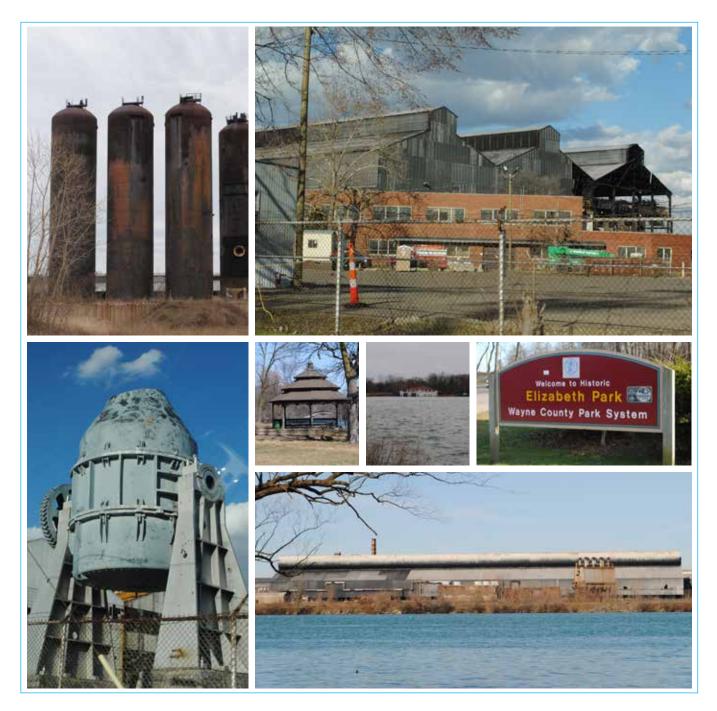
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INTRODUCTION

The U.S. Environmental Protection Agency prepared this **Community Involvement Plan** to inform, engage and support the **community** affected by the former McLouth Steel facility located in Trenton and Riverview, Michigan. Our **community involvement** effort is committed to promoting effective and meaningful communication between the **public** and the Agency. We want to make sure the community's concerns and information needs are considered as activities at the site progress.

This **CIP** was prepared to support environmental and **cleanup** activities at the former McLouth Steel facility. We used several information sources to develop this plan, including research, discussions with community members and information gathered during community interviews. We conducted interviews with 44 residents and local elected officials interested in the site's activities and cleanup efforts across Trenton, Riverview and Grosse IIe. Representatives from the Michigan Department of Environment, Great Lakes, and Energy (formerly the Michigan Department of Environmental Quality) assisted with the interviews. (Words in **bold** are defined in Appendix A.)

Please note: Effective April 22, 2019, the Michigan Department of Environmental Quality officially changed its name to the Michigan Department of Environment, Great Lakes, and Energy (or EGLE). All references in this CIP to that state agency will be EGLE, even when referring to actions taken when the agency was going by its previous name.

EPA's Community Involvement Goals

- Assist residents in understanding the steps towards decision-making during site investigation and cleanup.
- Give accessible, accurate, timely and understandable information about the project as it moves forward.
- Ensure adequate time and opportunity is given to the public to supply EPA with meaningful input, and for said input to be considered.
- Reflect and respond to community concerns, questions and informational needs.
- Respect and fully embrace resident involvement throughout the Superfund process.

This CIP describes EPA's plan for addressing concerns and keeping residents involved in investigation and cleanup activities at the site. We will use this document as a guide to involve and communicate with residents, businesses and the local governments of Trenton, Riverview and Grosse IIe.

If you are interested in submitting comments or have questions or suggestions concerning this CIP, please contact:

Kirstin Safakas

Community Involvement Coordinator Community Involvement & Outreach Section External Communications Office 312-886-6015 safakas.kirstin@epa.gov There is nothing more important than working with the public on projects that impact your neighborhoods and way of life! Community Involvement Coordinators are here to be your advocate throughout the Superfund process.

Kirstin Safakas, EPA Community Involvement Coordinator

The CIP is a working document. As input is received from the community, the investigation and cleanup process may evolve. This plan is intended to be flexible, adaptable and used as a guideline for our communication with the community.

Overview of the Site

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 entire 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. EGLE is overseeing the investigation and cleanup of the northern portion of the site, which is still referred to as RTRR.

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. In addition, DTE Energy Co. has an easement of about 1.5 acres on the site, from Jefferson Avenue to the Detroit River. (See "Site Map" for more details.)

Under the terms of the Purchase Agreement between Wayne County and MSC, MSC is required to invest \$20 million in two phases to demolish structures and construct an industrial development. Under a separate agreement called an Administrative Settlement Agreement and Covenant Not to Sue (or 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-liable parties) received covenants not to sue. This will foster redevelopment by allowing MSC and Crown to manage environmental requirements while EPA investigates and cleans up the remainder of property.

To secure the covenants not to sue, the Settlement Agreement requires MSC to do the following work in the southern portion of the site (see "Site Map" on Page 4):

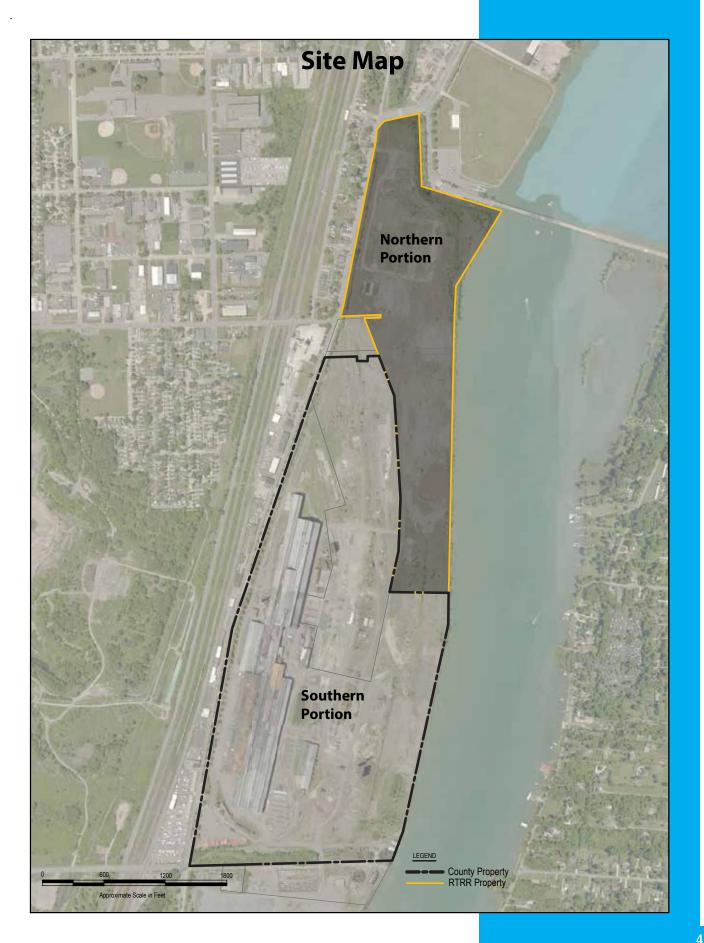
- Demolish about 45 structures.
- Remove asbestos-containing material, containerized wastes and materials containing polychlorinated biphenyls, or PCBs, from all structures prior to demolition.
- Install a fence around the property.
- Remove contaminated water and sludges from 23 subsurface structures, clean or remove the structures and, if the structures remain, fill them with clean fill materials.
- Investigate five areas where PCBs may have been released.
- Assess and report on options for stormwater management to eliminate uncontrolled flow to the Trenton Channel of the Detroit River.

The above work is being overseen by EPA's Emergency Response Branch of **Superfund**.

To address environmental issues not covered by the Settlement Agreement, the southern portion of the site has been listed on the Superfund **National Priorities List**. The May 15, 2019 listing of the site on the NPL makes work within the southern portion eligible for federal funding. This work will be overseen by EPA's Remedial Branch of Superfund (see Page 40 for more detail).



Former McLouth Steel facility from Jefferson Ave.



Current Site Photos



Teardown work at the site in March 2019.



Double entry fencing on the site.



Former McLouth Steel facility.



Teardown work at the site in March 2019.



Silt fencing at east end of property by the river.



Former McLouth Steel Facility ovens.



COMMUNITY CONCERNS & QUESTIONS

Ongoing input and involvement with the community is essential in our efforts to provide effective **community engagement**. We have learned that EPA's decision-making ability is enhanced by actively seeking input and information from the community. Residents need to be involved in all phases of the investigation and cleanup so that the contamination is addressed in a way that protects people and the environment – now and in the future.

Residents, business owners and local government officials may be able to provide valuable information about a site that can help us determine the best way to clean it up. Information from locals can help determine the location of contamination, how people may be exposed to the contamination and perhaps even sources of the contamination. Residents and officials of the cities of Trenton, Riverview and Grosse lle educated EPA about their community and told us about their concerns which are presented below.

> In 2001, Riverview, Trenton and Grosse lle passed resolutions supporting the proposed listing of the former McLouth Steel site on the National Priority List, or Superfund.

This section is intended to faithfully record and reflect the issues and concerns expressed to EPA by residents and officials interviewed during our community interviews. By necessity, this is a collection and summary of thoughts and observations and, in some cases, opinions. Please be cautioned that the statements contained in this section may or may not be factual and that the opinions/concerns expressed may or may not be valid.

What We Heard

We learned about concerns, questions and informational needs related to the former McLouth Steel facility by conducting interviews with 44 residents, local officials and other interested parties in March and April 2019. The concerns and comments we heard are listed below.

Community Concerns Redevelopment

Virtually everyone EPA interviewed expressed concern about the future use of the site. Most of the people said they did not want the site to be developed for industrial use. Several said they were more concerned about what happens after the cleanup than the cleanup itself.

Many stated that they did not want to see the site used as an intermodal port, which is what they said they heard MSC wanted to do with the site. A few people specifically expressed concern about the effect a port would have on the ecosystem, including how it would affect waterfowl and fishing as the area is a nesting spot for waterfowl and home of an International Wildlife Refuge. They said that they did not think the tax benefit from a shipping port would offset the environmental impact it would have on the area. Some were concerned about the effects on property values. Another resident said she did not think the local governments have a sense of



Photos around Elizabeth Park.

urgency about the development of a port. One person said that it bothered him that they "have one of the best ecological areas in the country with wooded areas and the water and people want to use it for industry". Finally, another said MSC's proposal for the purchase of the property said the company was planning to put in a port, so she did not understand why people think it will be anything else.

Many people that EPA spoke with said they would like to see the site developed as residential with small mixed-use businesses or even a park. They also said they would like to have access to the river from the site. A couple of people said that they thought the city would benefit more from taxes derived

from dense residential development and small businesses rather than a port. One person said he would like to see a development like Harbortown in Detroit. Another said she would like to see a hotel and conference center with Great Lakes cruise ships on the river, but that she felt it was inconceivable. She said, "We would like to reclaim the waterfront for public use." Still another said he would like to see something that brought in tourism that was "positive" and created "energy". One said he would



International Wildlife Refuge.

also be concerned that some contamination could unexpectedly "pop up" down the road. Several other people mentioned that the cities and schools need money and they welcomed industrial development of the site as it could benefit the economy and create jobs. Some residents felt that the community does not need any more parks. As one said, "Parks do not generate money. They cost money. We need something that generates tax money and jobs." This individual said he would like to see four or five industrial users at the site, though he would like the property to be more aesthetically pleasing.

A few said they do not want anything to be allowed to be built until the contamination in the ground and **groundwater** has been thoroughly investigated and cleaned up.

Rezoning

Most of the people EPA spoke with expressed concern about the property on which the McLouth Steel facility sits being potentially rezoned. They said that they understood the city of Trenton was considering changing the zoning of the property from mixed-use to industrial, and that they did not want the zoning to change. Several said they were concerned that if the property were rezoned industrial, then it would always be industrial- that there would be no hope for it to ever be anything but industrial. Others pointed out that



One of many parks throughout Trenton.

changing the zoning to industrial would not be following a master plan that had been developed for the city. A couple of people stated that it was "very frustrating" when EPA referred to the site as industrial when it is still currently zoned mixed-use.

Trust

Most people EPA spoke with stated that they did not trust the current owner of the site to do the cleanup properly. Residents told EPA stories about incidences involving companies like Crown which caused them to have reason for concern about the family's involvement at the site. One resident said, "EPA should watch them closely. They may not do something illegal, but they know how to bend the branch." Another pointed out that the community would not have the money to sue Crown/MSC if things are not handled properly.

Several people expressed concern that the purchase and demolition of the site could impede EPA's investigation if Crown/MSC is permitted to develop the property before investigation is complete. As an

interviewee stated, "This is going to let the horse out of the barn before the field has been plowed." Many expressed concerns that the company doing the current teardown work on the site already had a Notice of Violation for its handling of **galbestos**, an asbestos-containing material. Some said it was especially concerning that the violation occurred when the federal government was shut down so there was less oversight. Several people said this event demolished any trust people may have had, and that the company could have worked on some other tasks if they were not able to follow the best practices for asbestos removal (best practice for asbestos removal involves wetting the material except when temperatures are below freezing).



Galbestos panels.

Residents mentioned that in the future if the government is shut down again the work should stop. Others showed concern over the removal of asbestos and other materials and whether they are being taken to a "proper" disposal facility. A few people interviewed openly stated that they do not trust the government. One thought it seemed like EPA was just trying to give people false "peace of mind" about what teardown/cleanup work was being doing at the site. Another said EPA needs to work on building trust.

Communication

Most people that EPA spoke with told us there was a clear lack of communication and understanding surrounding the site. Many stated that they were not happy that there had not been a public meeting since September 2018-they were told that there would be regular updates, but that has not been the case. One person said that she felt "people were patronized at the last meeting" and that the meeting itself was a "joke". She said EPA should provide facts in a sterile, transparent, and honest manner, and that, "If it isn't favorable, just say that. Do not sugarcoat it."

Many expressed frustrations that they had not been told by EPA about the asbestos-removal violation, and that the only reason EPA knew about the violation in the first place was because a resident reported it. One individual questioned what stakeholders were informed about the violation, as he had not been. He requested that all stakeholders be informed of any violations in the future.



MSC installed an asphalt berm to reduce stormwater runoff to the Detroit River.

Several told us that there were a lot of rumors surrounding the site, so the Agency needs to provide facts to limit the spread of them. For example, interviewees told us that people had seen black material on the site and speculated that it could be petroleum coke, or "pet coke", which caused great concern in the community. During the interviews, EPA explained that the material was an asphalt berm that was built on the site to control surface water runoff, and that the County Purchase Agreement does not allow for the storage or processing of pet coke. Because of this and other rumors, several requested that EPA should provide more details regarding "day-to-day" activities at the site so that people would know what to expect. A couple of people said that EPA should provide a map of the site depicting exactly what buildings and contamination existed on-site. One person suggested that EPA providing short videos of the work may help.

Several people stated that residents do not understand the various agencies and entities involved at the site. They requested that EPA explain who is responsible for doing what and what each entity can and cannot do.

A few people commented that EPA's website was not up-to-date and said they thought EPA should post information more often to make certain everything is available to the community. A couple said that EPA should explain all the **contaminants** that had been found at the site and the associated health risks of those contaminants because currently, the website only lists asbestos and PCBs. Another said EPA should provide the results of all the site investigations so people "know what is there" even if it was "just a bunch of numbers". One resident requested that EPA assist the community in interpreting those numbers.

Sale of the Property

Many people said that they were unhappy with Wayne County's sale of the property to MSC. Several expressed concern that the sale happened "too fast" and that the community did not have enough time to get involved. One said more time should have been spent studying the site to determine what other options there might have been for a sale.

On the other hand, a few locals said that they believed that the sale to MSC was the best possible outcome- as they understood it, that bid was the only one that included demolishing all buildings on-site. One of the people we interviewed said that MSC is spending a lot of money here in which the community is benefitting from; MSC is taking the burden off the state and federal government. Another person we spoke with said that he thought



Former McLouth Steel facility.

this site could be a positive story for MSC- he knew they had a bad reputation but was hoping this would be an opportunity to turn things around.

Superfund Program

Many people we interviewed said they were glad the site was going to be placed on the NPL making it eligible for federal money through Superfund. However, most said they were concerned that the site would not actually get the money, and many seemed to not understand how the money is allocated in

general. A few people told EPA that people did not understand the length of time MSC's current work or EPA's Superfund investigation and cleanup process would take. Residents commented on how they expected this process to move faster and that EPA needs to better explain the timeline for this site.

Potential for Traffic

One of the biggest concerns raised during the interviews was regarding the potential for an increase in traffic if the site



Trucks wet down the site to control dust.

were to be developed into an intermodal port. Many people expressed frustration over the negative impacts increased truck traffic would have on already-congested roads. How will this traffic affect local infrastructure? Several residents said they were concerned about how increased truck traffic would cause even more pollution if the site were to be developed for industrial use, and others questioned

whether the tires on the trucks carrying hazardous materials would be washed when leaving the site [note: they are thoroughly washed with an installed, on-site wheel washer].

Many people also questioned if an industrial site/port would cause an increase in train traffic, as residents feel that trains are already a problem in Trenton and Riverview. People also expressed concern about the potential impact a port would have on the two bridges which connect to Grosse IIe. A couple said they were concerned that



Dust-suppression truck.

MSC may tear down the toll bridge, leaving Grosse lle residents with only one bridge to get on and off the island. Others told EPA that the bridge had already been hit twice by boats, causing a shutdown.

Air Pollution

More than half of the people interviewed expressed concern about air pollution being released from the site, and most of them specifically expressed concern over asbestos. Several said that winds blow from the west, so airborne contaminants are carried that direction (towards Grosse IIe). A couple said that dust from the site blows into their home and leaves black residue on their roof. One resident of Grosse IIe said he could feel the dust from the site blowing across the river, and that it was especially bad since vegetation at the site had been removed.

Several expressed concern about air monitoring, specifically where the locations of the monitors were. Many residents felt that monitoring should also be done off-site, and a few said they would like to see air monitors set up at area schools as there are three elementary schools within a mile of McLouth. One person said he would like to see the data from the air sampling published on our website [it has since been posted online].



Asbestos-wrapped pipes.



Perimeter air monitors.

Water Pollution

About a third of the people we interviewed said they were worried about the effect that site contamination had on the Detroit River. Several residents expressed concern over the site's redevelopment as a port and its potential for ships to stir up old sediment, exposing contamination below. A couple expressed concern about the impact future dredging may have on the river, and how that action could negatively impact the International Wildlife Refuge.

Another person explained to EPA that there were "subsurface water flows" that carry contamination underneath the river to Grosse IIe, and that contaminated sediment currently piles up around Grosse IIe.

Locals said they were concerned about how contamination could affect fish in the river. The area is good for fishing- could that change in the future? Someone else commented that he had not seen any studies of what site-related contaminants were going into the river. Another said while she understood that much of the McLouth plant was



Fishing on the Detroit River.



Waterfowl on the Detroit River.

built on top of a wetland, she had concern that the land is more porous and would allow groundwater contamination. Many residents were concerned that the groundwater contamination and pathways had not yet been studied so it is not known how "bad" things could be.



One person let us know that local schools' rowing teams use the river on a

View of the McLouth Steel facility from Grosse Ile.

regular basis. She was concerned about how contamination could affect kayakers using the river for recreation.

Glad Cleanup Being Done

Nearly a third of the people we spoke with said they were glad the site was being cleaned up, regardless of what happens with it; most said they were glad to see the buildings finally coming down. A couple of people said they were happy with "what EPA and DEQ [EGLE] did to get this done" and yet another said the cleanup will be good for area businesses. One local was worried that people's outrage will stop the cleanup process.

Want Cleanup Done Right

About a dozen people we interviewed expressed concern about how exactly the cleanup would be donethey want the cleanup done "right"; that, "Downriver is a beautiful area and if it is not cleaned up properly, things could go badly." One individual did express hope stating that, "We may not always be happy, but I hope they do the right thing at least."



Eagle's nest seen on Grosse lle.

One person expressed concern over the cost of the cleanup- if the cleanup gets too expensive, can the work stop? Another resident wondered about the unexpected and that if something was found on-site the whole process could be delayed.

Cleanup Levels

Several people EPA interviewed questioned if EPA was cleaning up the site for residential or industrial use, with most of them wanting it cleaned to residential levels. A few requested EPA to simply explain the difference between the two levels and asked us to define the difference in cost so people could weigh the cost against the benefit. Others expressed concern that the cleanup level will determine what can be done at the site 100 years "down the road".

[Note: In Michigan, there are two cleanup standards: residential and non-residential. There is no industrial cleanup standard.]

Potential for Accidents

Several people EPA spoke with talked about the concern they had regarding what would happen if there was an accident or emergency at the site, and whether EPA had a contingency plan in that event. Most of those expressed concern about how people would be notified if there was an emergency, particularly during the cleanup of the site. A few locals commented on their worry over people getting trapped on Grosse lle if there was an emergency at the site. One person said he was concerned about three nearby schools and the effect that an accident could have on the schoolchildren.

Health

Several people expressed concern about the health of residents and pets. Two people who expressed concern about asthma wondered if their conditions had been worsened by contamination from the site, as they reported their health had deteriorated once work began. One said he was worried about the health of area residents due to the potential exposure to asbestos during the teardown. Another said four of his neighbor's dogs died of cancer and questioned whether contamination from the site was to blame. Still another told EPA that there were a lot of people with thyroid problems in the community. Finally, one person expressed concern about the potential health problems from what he said were probable "toxic heavy metals" at the site and requested that EPA screen for this during its **remedial investigation**.

Additional Concerns Expressed

Soil Contamination: Several people expressed concern about potential soil contamination on-site.

Effect on Animals: Some said they were concerned about the potential effect the contamination may have on animals, both currently and if the site were to be developed as industrial.

Sound Pollution: One person expressed concern about potential sound pollution during the cleanup and afterwards.

Potential Contaminants: A couple said they were concerned about the potential for additional contamination such as cyanide at the site.

"What Defines Your Community?"

"A good place to ride your bike"
"The river is peaceful"
"People are very proud of Downriver- you're part of a community"
"Comradery and togetherness. Hockeytown!"
"When someone is ill, people come out to support- it's close-knit"
"A lot of parks and the International Wildlife Refuge"
"Good property values- people keep their homes up"
"It's home!"

Community Questions

Please note: EPA will respond to these questions in fact sheets, email updates or public meetings.

Contamination

- 1) Why are only two contaminants listed on EPA's website?
- 2) Have all the contaminants been identified?
- 3) What are the locations of those contaminants?
- 4) Can EPA provide a list of all hazardous chemicals or substances on the entire site (north and south), and can the potential hazards associated with those chemicals or substances be shared?
- 5) Does the fact that more than half of the McLouth Steel buildings and facilities were built on wetlands, a creek, and the Trenton Channel create a possibility that groundwater pollution may flow underground differently than native soil?
- 6) Has EPA, or any entity, studied the contamination present in the sediment in the Trenton Channel or Detroit River near the site (including the 76-acre portion in Riverview)? If so, what were the results of those studies? Is there a plan to clean up the sediment?
- 7) Could the disturbance and release of contaminated sediment pose a risk to people, animals, the river, or the overall environment?

Timeline

- 8) How and when did EPA get involved?
- 9) What is the timeline for all the work at the site?
- 10) When does EPA start its investigation and cleanup?

Building Demolition

- 11) What studies were done before MSC purchased the property?
- 12) How will the lagoons be cleaned?
- 13) Are all truck tires being washed while the demolition is going on?
- 14) What types of studies went into all consequences before knocking down buildings and moving forward?
- 15) Is there any chance the truck routes for cleanup work will change?
- 16) Why was the property sold before a thorough investigation was done?



Building demolition began in January 2019.

- 17) By controlling runoff, are you collecting and removing the water?
- 18) Is there any chance EPA will say the cleanup costs too much, making MSC do less?
- 19) Has anything been found that was not expected?
- 20) Who is responsible for reporting findings and to whom do they report?



Entrance to the International Wildlife Refuge.

Superfund Investigation & Cleanup

- 21) Is the site on the NPL?
- 22) How much money is in Superfund?
- 23) How many Superfund sites are in the country? How many in Michigan?
- 24) Where do we fall in the priority of sites?
- 25) What factors go into determining cleanup levels?
- 26) Does EPA look at a community's vision when deciding the cleanup?
- 27) How much more it would cost to clean up to residential levels?
- 28) When will EPA's remedial investigation start?
- 29) Could a feasibility study be impacted by negligence now?
- 30) How is DSC going to be affected by the NPL listing?
- 31) Are there any plans for dredging?
- 32) What are the quantitative measures used to determine what is feasible?
- 33) Will EPA's cleanup do anything with sediment or at least control what happens with sediment?
- 34) What is EPA's plan for ensuring that all environmental problems in the soil and groundwater on the entire McLouth site (including the 76-acre parcel in Riverview) are studied and have cleanup plans identified prior to the approval of the redevelopment of the property?

Monitoring & Oversight

- 35) How do you monitor now? How will you monitor down the road?
- 36) How often are air samples taken? Where is the air monitored?
- 37) What exactly is monitored? Asbestos? Dust? Other pollutants?
- 38) How will you control dust and pollution blowing offsite?
- 39) How often are EPA staff on site?
- 40) Is there any guidance that determines how often EPA should be on site?
- 41) What are you going to do if they don't do what they are supposed to do?
- 42) Is any air monitoring being done outside the site?
- 43) Why hasn't sampling data been released?
- 44) Are there any plans to put air monitors outside the boundaries in the neighborhoods?
- 45) Explain how asbestos travels in the air.
- 46) Explain where the air monitors are and what and how they test for.
- 47) What precautions are being taken to make sure people are safe while hazardous material being trucked off?
- 48) If areas are encapsulated, how will the encapsulation be monitored and by whom?
- 49) How will long-term monitoring of liquids on the site be conducted?

Redevelopment

- 50) How much control does EPA have over what happens with the site?
- 51) Can MSC operate their business before the investigation and cleanup is complete?
- 52) Can MSC store pet coke on the site?
- 53) Can MSC ship pet coke as long as they are not storing it?
- 54) Does EPA have a say in what can be done on the property?
- 55) Is there a published guide to determine what can be developed at a site?
- 56) If there is a plan for a port, will an Environmental Impact Statement, or EIS be developed?
- 57) Can EPA provide the public information on the effects freighters and other commercial vessels using docks at the former McLouth site might have on sediment in the Trenton Channel or Detroit River?



Air monitoring particulate matter on-site.

Asbestos Notice of Violation

- 58) Why didn't the government shutdown trigger a stoppage of work?
- 59) How is the asbestos being removed now?
- 60) What is the projected volume of galbestos or asbestos?
- 61) Where is the galbestos and/or asbestos on-site?
- 62) What is the pile of white stuff on the site that looks like asbestos that can be seen from Jefferson Avenue?



White piles of limestone can be seen on-site.

General

- 63) Who and how will people be notified in an emergency?
- 64) Why is EPA moving out of Grosse Ile?
- 65) What will the office closure mean to the site?
- 66) Are there any endangered species in the area?
- 67) If MSC sells the property are the terms and conditions of the Settlement Agreement transferable to the new owner?
- 68) Can EPA provide any reports or analysis of the cleanup of other steel mills in Michigan or any other states?
- 69) Can EPA provide any reports or analysis of the type of pollution these facilities can create in a community?
- **70)** Can EPA provide a technical advisor to help the public understand the site's technical information?

Industrial vs. Mixed-Use Cleanup Levels

- 71) Can EPA provide the public with an explanation of all the significant differences, including cost estimates, between cleaning up the entire McLouth Steel site (including the 76-acre parcel in Riverview) to EPA's industrial standard verses the mixed-use standard?
- 72) What is the approximate difference in terms of the level of pollution currently on the site that will not be cleaned up or removed under EPA's industrial standard verses the mixed-use standard?
- **73)** What is the difference in risk to people, animals, or the environment between the two cleanup levels?
- 74) If Trenton does not rezone the property to industrial, would that affect the cleanup standard EPA will use at the site- can EPA require that the site be cleaned up to a level consistent with mixed-use zoning?



COMMUNITY INVOLVEMENT OBJECTIVE & ACTIVITIES

When establishing objectives for a site-specific community involvement program we consider several factors, including federal requirements and EPA policy that assess the nature and extent of known (or perceived) site contaminants and known community concerns.

To be effective, our community involvement program is designed to meet the community's need to know. EPA plans to give information in a timely manner and accommodate the community's interests as well as its willingness to participate in our decision-making processes. We are tasked with sharing information in plain language, so that the public can understand.

We have established the following objectives for our community involvement efforts:

- Enlist the support, coordination and involvement of Trenton, Riverview and Grosse Ile officials and community leaders.
- Enlist the support, coordination and involvement of EGLE.
- · Monitor citizen interest in the site and respond accordingly.
- · Keep the community well-informed of ongoing and planned site activities.
- Explain technical site findings and documents in an understandable format for residents.
- Get public input on key decisions steps.
- · Change planned activities, where warranted, based on community input.
- Update EPA's website regularly, providing useful information for the community.
- Update the officials of Trenton, Riverview and Grosse Ile on a periodic basis.
- Hold **public meetings** and availability sessions, when necessary, within the community, giving all residents an opportunity to attend.

EPA has or will put in place the activities described on the following pages to actively engage the community in decisions regarding the investigation and cleanup of the former McLouth Steel facility. The following plan is intended as opportunities for communication between the community and EPA, addressing key concerns and questions raised during the community interviews conducted with locals in Trenton, Riverview and Grosse IIe.

Community Involvement Activities

To address community concerns and questions described in the Community Concerns section while also meeting federal requirements, EPA has conducted/will conduct the activities described below. Through these activities, it is our goal to inform, involve and engage locals during site cleanup efforts. As the needs of the community change, we will modify community involvement strategies to address them.

Maintain Point of Contact

Kirstin Safakas is the primary liaison between EPA and the Trenton, Riverview and Grosse Ile communities. Kirstin serves as the point of contact for community members and fields general questions about the site. For technical site issues, she coordinates with Brian Kelly, EPA's **On-Scene Coordinator**, or **OSC**, and Nabil Fayoumi, EPA's **Remedial Project Manager**, or **RPM**. Brian is responsible for overseeing the work being done under the Settlement Agreement with MSC, and Nabil is responsible for overseeing the investigation and cleanup under Superfund.

Kirstin Safakas Community Involvement Coordinator 312-886-6015 safakas.kirstin@epa.gov

Brian Kelly On-Scene Coordinator 734-692-7684 kelly.brian@epa.gov

Nabil Fayoumi Remedial Project Manager 312-886-6840 fayoumi.nabil@epa.gov

Post Information Online

www.epa.gov/superfund/mclouth-steel

We will provide information on activities and past communications on the EPA website as well as update it as events occur. Community members interviewed recommended that EPA use local Facebook pages and the social networking service Next Door to reach people. As appropriate sites are identified, EPA may post information on those pages.

Sepa

Located in the Chicago office, Kirstin and Nabil can also be reached weekdays toll-free at: 800-621-8431 from 9:30 a.m. to 5:30 p.m.



Create Contact Lists

We have established a mailing list of residents, organizations, businesses and officials. This list will be used for mailing fact sheets, site updates, invitations to public meetings and events, and other site-related information. We will update the list regularly to reflect address changes as well as changes in elected officials. When requested, we will also add new interested parties to the lists. It is important to note that the mailing list primarily consists of people who have requested to receive hard copies of documents. Due to the large geographical area surrounding the site, it is not financially feasible to mail to all nearby residents. Instead, we have also developed an email distribution list, generally updated monthly. If a community member is interested in being placed on the mailing and/or email list, they can contact Kirstin Safakas, the site's **Community Involvement Coordinator**, or **CIC**. These lists are for EPA use only and are not shared with outside entities.

Prepare Fact Sheets for Updates

We will prepare and distribute fact sheets, letters and site updates summarizing current information about the site and describing upcoming activities. These documents are written in non-technical language and usually developed to coincide with important site activities. In addition to being shared with individuals on the site's distribution list, we also place all written documents in the **information repository** as well as post them on EPA's website. As appropriate and feasible, the information in these documents may be placed in the local newspapers such as the *News Herald, Trenton Tribune, Island Beacon, Riverview Register* and *Grosse Ile Grand*. EPA will also distribute them to various drop-off locations throughout the communities.

Distribute News Releases

News releases allow us to reach large audiences quickly. We will post news releases on the site's website as well as release announcements to local newspapers such as the *News Herald, Trenton Tribune, Island Beacon, Riverview Register* and *Grosse lle Grand*. In these news releases, EPA will share information about significant site investigation findings, **public comment period**s, public meetings and completion of major milestones such as the proposal of a cleanup plan (**Proposed Plan**). We will also provide this information to Trenton, Riverview and Grosse lle, as well as other local organizations for posting on their respective websites or newsletters. Community members interviewed suggested hanging flyers announcing meetings or significant findings at the local community centers, libraries, churches, restaurants, stores, senior centers and salons across the communities.

Establish Information Repositories & Administrative Record

We have set up local information repositories and the Administrative Record at the following locations:

Trenton Veterans Memorial Library

2790 Westfield Road Trenton, MI 48183 734-676-9777



Trenton Library.

Riverview Veterans Memorial Library

14300 Sibley Road Riverview, MI 48193 734-283-1250



Riverview Library.

This is a collection of site information available to the public for reading and photocopying. The Administrative Record gives residents a paper trail of all legal documents EPA uses to reach decisions about site cleanup. Documents include fact sheets, technical reports, the CIP and general Superfund information, and are also housed at the EPA Region 5 Superfund Record Center in Chicago (see Appendix C. An online database will remain available on the site's web page.

Conduct Public Meetings

Public meetings are an opportunity for EPA to present specific information and a proposed course of action. These meetings are not formal public hearings where testimony is received and recorded; instead, EPA may hold gatherings to exchange information with residents. In addition, EPA may hold an informal open-house, called an "availability session", where citizens can meet EPA experts one-on-one to discuss activities on-site. Either type of meeting allows community members an opportunity

to express their concerns and ask questions. EPA usually schedules these types of meetings when there are technical project milestones.

A public hearing is a formal meeting

where EPA documents the public's

"We always need to create space for people to share how they feel."

Local resident

views and concerns about an action or proposal. There are specific regulations about when the Agency is required to consider such comments. These hearings are recorded by a professional transcriber/ court reporter and become part of the site's administrative record. All written comments are also posted on the Web.

EPA will consider conducting additional meetings at different times and locations throughout the community to give all residents an opportunity to attend. Residents have suggested rotating the locations of the public meetings to each of the communities of Trenton, Riverview and Grosse IIe.

Participate in Local Events

On occasion, the city, local agencies, or community groups will invite EPA's participation in events to provide site information and respond to resident concerns. EPA considers invitations and offers to speak to community groups based on the event's ability to meaningfully reach members of the public. In our community interviews, it was suggested that EPA speak at events for: the Rotary Club of Trenton, the Trenton Business Association and the Friends of Detroit River. Residents also suggested EPA have a booth at local festivals such as the Trenton Summer Festival and the Grosse Ile Island Festival.

Assist in Forming a Community Advisory Group

www.epa.gov/superfund/superfund-community-advisory-groups

A **Community Advisory Group**, or **CAG**, is made up of residents, providing a formal mechanism for community members to have a voice in EPA decisions. CAGs are eligible for technical assistance and funding to help residents fully understand all aspects of environmental investigations, sampling data and interpretation of results and risks. During community interviews, EPA asked interviewees what they thought of forming a CAG for the site; almost all said they thought it would be a good idea. EPA expects this to begin convening in fall of 2019.

Provide Additional Superfund Tools

There are additional programs potentially of use to the community. Two of these programs are: the **Technical Assistance Services for Communities**, or **TASC**, and the **Technical Assistance Grant**, or **TAG**. The TASC program supplies communities with technical help so they can better understand the science, regulations and policies of environmental issues. TAGs provide funding for activities that help communities participate in decision-making at eligible Superfund sites. For more information on TASC & TAG, contact EPA CIC Kirstin Safakas.

Prepare Site Videos

To give residents a better visual of activities, EPA is taping a short video with MSC to show ongoing site work. The video will be posted on EPA's website.

Evaluate and Make Adjustments

This CIP was designed to consider site- and community-specific factors as well as to comply with federal requirements. EPA recognizes that changes in areas such as community perceptions, information needs and population demographics can occur over time and that such changes may necessitate a revised approach to conducting community involvement. For this reason, as well as to determine whether the activities in this plan are achieving their intended objectives, we will conduct periodic reviews to determine whether changes to current methods are necessary. As the needs of these community change, we will modify our community involvement strategies and address them in a CIP revision.

Community Involvement Timeline

The graphics/charts on the following pages show community involvement activities EPA organizes at a site and how they follow along with the investigation and cleanup process. The following is a list of past community involvement activities at the site:

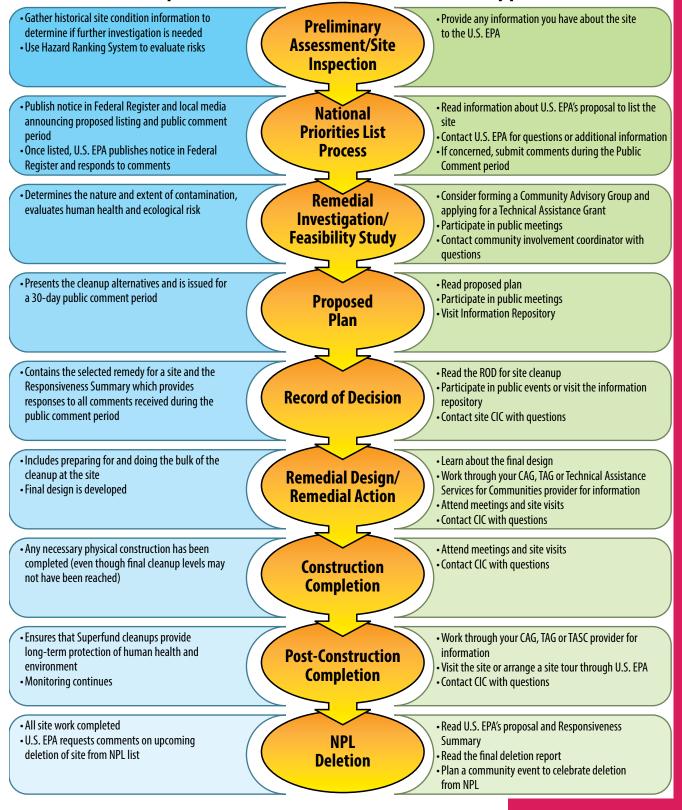
- August 2018- Two fact sheets were developed, explaining the proposed settlement agreement as well as Frequently Asked Questions. Copies were sent to local municipal buildings in Trenton, Riverside and Grosse IIe for distribution to the community. Copies were also mailed to officials of the three municipalities.
- August 8, 2018- EPA and EGLE attended the Trenton City Council meeting to explain the Settlement Agreement and cleanup process.
- August 14 to September 14, 2018- Public comment period was open on the proposed settlement for the site.
- August 14, 2018- Notice of the comment period and upcoming public meeting was published in the Federal Register.
- August 19, 2018- Advertisement was placed in the *News Herald* announcing the public meeting and comment period.
- August 20, 2018- Fact sheets were hand-delivered to the municipal buildings in Riverview, Trenton and Grosse IIe, as well as public libraries in Riverview and Trenton.
- August 27, 2018- EPA and EGLE met with Trenton Visionaries at Trenton City Hall.
- September 2018- Postcard was distributed to public locations throughout the communities explaining where to get more information regarding the site.
- September 5, 2018- EPA held public meeting with assistance from EGLE regarding the EPA's proposed settlement for the former McLouth Steel facility. A transcript of the meeting is available.
- September 10, 2018- EPA attended the Grosse Ile Township Board Meeting to explain the cleanup process and answer questions from the community.
- September 19, 2018- EPA hosted a meeting with the Grosse lle Civic Association.
- September 26, 2018- EPA hosted a meeting with MSC, Trenton Visionaries and Friends of the Detroit River.
- February 7, 2019- EPA arranged for a tour of the site with MSC, Friends of the Detroit River and Trenton Visionaries.
- March 3, 2019- Advertisement was placed in the News Herald announcing two rounds of community interviews.
- March 25 to 27 and April 9 to 11, 2019- EPA conducted community interviews with assistance of EGLE at Trenton Veterans Memorial Library.
- April 3, 2019- EPA sent email update #1 on site activities.
- May 1, 2019- EPA sent email update #2 on site activities.
- May 5, 2019- EPA attended the Riverview City Council meeting to explain the cleanup process.
- May 13, 2019- EPA Regional Administrator held a press conference at Trenton City Hall announcing the addition of McLouth to the NPL, with follow-up Q&A session.
- June 3, 2019- EPA sent email update #3 on site activities.
- June 10, 2019- EPA hosted a meeting with Trenton Visionaries to discuss NPL listing.
- July 8, 2019- EPA sent email update #4 on site activities.
- July 17, 2019- EPA holds public tour of the former McLouth Steel site with MSC.
- August 2019- EPA completed this CIP.
- August 2019- EPA released a new fact sheet on upcoming Remedial Investigation; included in the *Trenton Tribune* and *Island Beacon* newspapers (sent to approximately 15,000 residents).

Status of Community Involvement Activities

Activity	Status
Establish point of contact: Kirstin Safakas	Completed
Establish a toll-free number: 800-621-8431	Completed
Post information online: www.epa.gov/superfund/mclouth-steel	Ongoing
Create contact lists	Ongoing
Prepare fact sheets for updates	Ongoing
Distribute news releases	Ongoing
Establish information repositories & administrative record	Ongoing
Conduct public meetings	Ongoing
Participate in local events	As needed
Assist in forming a Community Advisory Group	Not yet started
Provide additional Superfund tools	As needed
Prepare site videos	July 2019
Evaluate and make adjustments	As needed

Superfund Process Steps

Community Involvement Opportunities





THE COMMUNITIES

The Former McLouth Steel Facility Superfund Site is located in the cities of Trenton and Riverview. Therefore, those two communities are affected directly by activities that take place at the site. In addition, Grosse IIe Township, which sits in the Detroit River directly across from the site, is considered a community impacted by site activities.

EPA met with officials and residents of all three communities in the development of this CIP. The following provides information about those communities, including their history, government and demographics.

City of Trenton

History

The area in which Trenton lies was first inhabited by Native American tribes. After the Battle of Monguagon (War of 1812), Native Americans were forced to leave the territory after which the white settlers moved in. The area that encompassed the city of Trenton was founded in 1834 by Major Abram Caleb Truax who decided to stay in the area after the War of 1812, selecting a piece of land that was highest in elevation along the Detroit River. The area first went by the names Truax, Truaxton and Truago, before settling on and being recorded under the name Trenton in 1850.

In 1855 Trenton was first incorporated as a village, although had to be reincorporated in 1875. The name Trenton comes from Trenton limestone which is found in the area. The settlement started with a sawmill, church and a small store, until another settler, Giles Slocum, built a dock on the river allowing steamboats to make Trenton a regular stop. This development brought new business and settlers to the area.



View of Jefferson Avenue in Trenton.



Detroit River from Trenton.

In 1929, an area in Monguagon Township was annexed by Trenton, enlarging the size of the city. In 1957, Trenton officially became a city.

The proximity of the city to the Detroit River has provided them a tremendous asset for industrial, commercial and recreational activities. Today, the city is connected to railroads, interstates and a major airport as well as the Detroit River. Descendants of Major Truax donated Elizabeth Park in Trenton to the residents of Wayne County. The park is located on an island that had been called Slocum's Island after Giles Slocum married Major Truax's daughter, building their home on the island. In 1923, Trenton built and named its high school Slocum Truax after these first settlers.

Governmental Structure

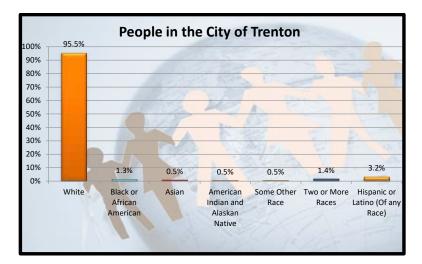


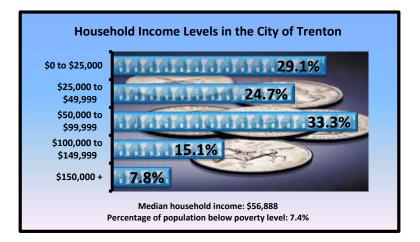
The city of Trenton has a mayor/ council form of government. A mayor and six council members are elected, setting goals and objectives for the city in their four-year terms. Trenton has hired a city administrator to run day-to-day operations of the city including organizational management, fiscal management, and program development and evaluation.

Trenton City Hall.

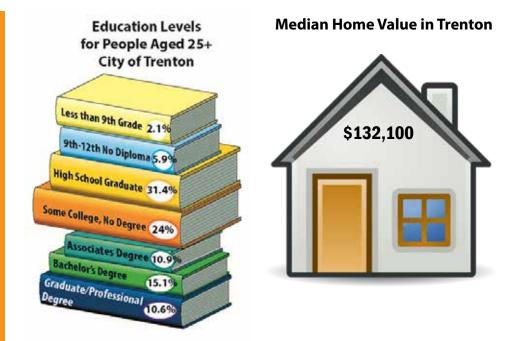
Demographics

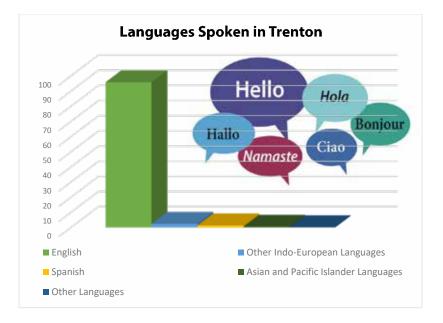
Source: U.S. Census Bureau











According to the 2013-2017 American Community Survey, the English language is predominantly spoken in Trenton with 95.8-percent of the population speaking only English. Approximately 4.2-percent of the population speak a language other than English and of those, 1.3-percent speak Spanish, 2.4-percent speak other Indo-European languages, .4-percent speak Asian and Pacific Islander languages, and .1-percent speak "other".

City of Riverview History

The area that encompasses the city of Riverview was once in Monguagon Township known as "river view". It had a lot of trees, becoming a valuable resource for the area. The area also contained limestone, which became an even bigger resource and is still mined at one quarry. These resources created many jobs, leading to the development of other industries. A lack of city water needed for continued development caused the community to merge with an area called Wyandotte Heights, bringing in city water. In 1923, the village of Riverview was officially incorporated and water was brought to the area. Riverview became a city in 1959.

In the 1950s, Riverview housed Nike Ajax missile silos that were part of the national nuclear response system and to protect the nearby automobile and steel industries of Detroit. A plaque commemorating the missile silos reads, "This was once the site of an Army Anti-Aircraft Missile Base, Battery C, 85th AA Guided Missile Battalion which provided air defense to our community from 1956 to 1962.

Governmental Structure

Like Trenton, the city of Riverview has a mayor/ council form of government. The mayor and six council members are elected and determine the policies for the community. The mayor and council serve four-year terms, with the council's terms overlapping. Riverview has hired a city manager to manage day-to-day operations of the city, including managing city personnel and enforcing city ordinances. The city manager also attends and participates in council meetings but does not have a vote.



Nike Hercules Missile on display.



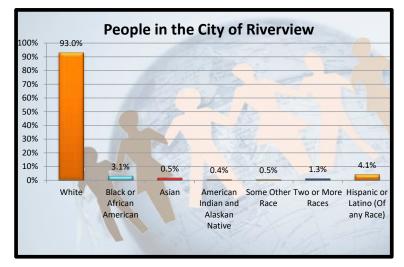
Plaque commemorating the Army Anti-Aircraft Missile Base.

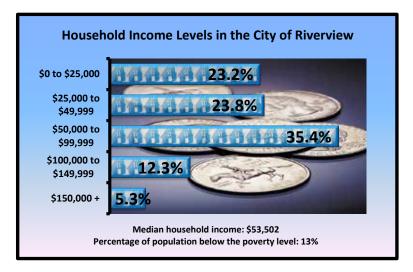


Riverview City Hall.

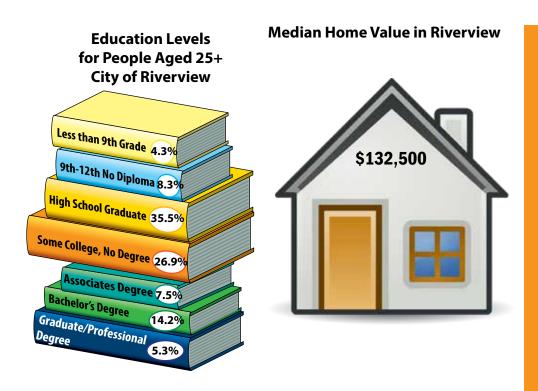
Demographics

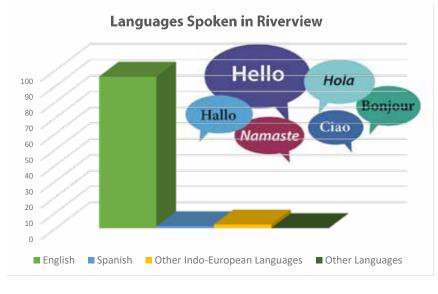
Source: U.S. Census Bureau











According to the 2013-2017 American Community Survey, the language spoken in Riverview is predominantly English, with 94.6-percent speaking only English. Approximately 5.4-percent speak a language other than English and of those, 2.7-percent speak Spanish, 2.2-percent speak other Indo-European languages, and .5-percent speak "other" languages. Overall, 2.3-percent said they speak English "less than very well".

Grosse Ile Township

History

Grosse Ile Township is made up of several islands on the Detroit River, with the largest island named Grosse Ile. Grosse Ile is French for "Big Island", whose explorers named the island in 1679. The island was originally inhabited by the Pottawatomi tribe who sold it to French explorers in 1776. Grosse Ile is the largest and most populous island in Michigan. In 1829, Grosse Ile was incorporated into Monguagon Township, and while it remained an independent community, it did not form its



Docks on Grosse Ile.

own township until 1914. Two bridges connect the island to the mainland- the Wayne County Bridge and the Grosse IIe Toll Bridge. The Grosse IIe Municipal Airport is on the southern end of the island.

Governmental Structure

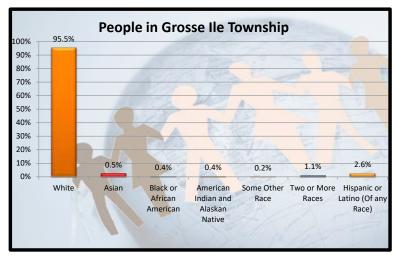
The government of the township includes an elected board consisting of a supervisor, clerk, treasurer and four trustees, all serving four-year terms. The supervisor is the Chief Executive Officer of the township, acting as the legal agent for the township-responsible for developing township budgets, property assessments, maintaining records, etc. The board hired a township manager who oversees the day-to-day operations of the township, including managing township projects, negotiating contracts and advising the board.

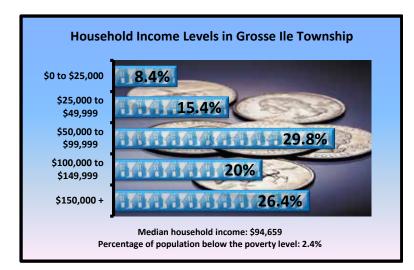


Grosse Ile Township building.

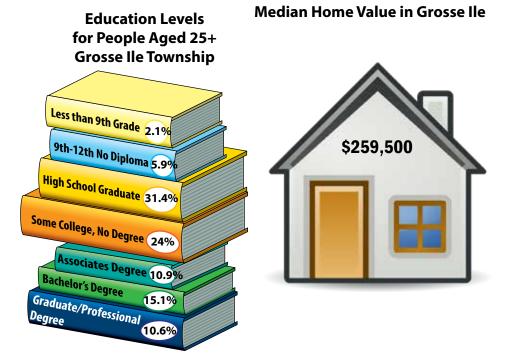
Demographics

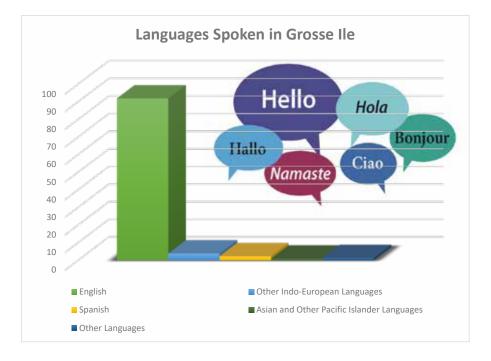
Source: U.S. Census Bureau











According to the 2013-2017 American Community Survey, 91.8-percent of the population in Grosse IIe only speaks English. Approximately 8.2-percent of the population speak a language other than English, of those, 2.3-percent speak Spanish, 3.8-percent speak other Indo-European languages, .8-percent speak Asian and Pacific Islander languages, and 1.3-percent speak "other" languages.

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THE SITE

For more information including site history, see "Overview of the Site" on Page 3.

Site Cleanup

On December 17, 1999, EGLE and DSC executed a Comprehensive Action and Remedial Consent Order, referred to as the Combined Order. The Combined Order sought to address contamination from numerous waste management units and areas of concern within the property and at a sister plant in Gibraltar. DSC began to perform but did not successfully complete all work required according to that Order.

On June 14, 2007, a fire broke out at the property in an open pond used to collect waste oil. Firefighters and the Downriver Emergency Response Team extinguished the fire. During a review of the scene, first responders identified hundreds of containers and drums of wastes. On October 16, 2007, EPA and EGLE also discovered over 3,700 PCB-containing transformers and capacitors stored in the upper rafters of one of the steel production buildings.

Between May 12 and October 2, 2009, EPA conducted a Superfund-led removal action at the property that included the removal and disposal of 3,744 PCB capacitors, 39,783 gallons of PCB oil and 1,877 containers of **hazardous substances.** In September 2012, EPA closed out the approximately two million in costs after it determined that DSC had no ability to pay. EPA elected not to record a lien against the property after we determined that there were already significant tax liens in place that had priority over EPA's potential lien.

On March 18, 2011, EGLE referred the southern section of the former McLouth facility, including the property, to Region 5's Superfund Program. EGLE noted, "The current owners and operators are unable to perform the necessary corrective actions, and this referral is necessary to ensure that actions can be taken to protect the public health, safety and welfare and the environment from hazardous substances that remain on the property." On May 11, 2011, Region 5 transferred responsibility for the southern portion of the former McLouth facility from its **Resource Conservation and Recovery Act**, or **RCRA** program to its **Comprehensive Environmental Response, Compensation and Liability Act**, or **CERCLA** program.

In August 2017, vandals broke into a laboratory area in the old office building, spilling mercury on the property. EPA conducted a removal action which was completed in a matter of days.

Current Status

EPA, the Department of Justice and EGLE negotiated a legal agreement called a "Settlement Agreement and Covenant Not to Sue" with Crown Enterprises, Inc. and MSC Land Co. Under the terms of the settlement, MSC is doing some cleanup and assessment activities within the southern portion of the site. In exchange, MSC and Crown received covenants not to sue, enabling the companies to take title to 183 acres of the former McLouth Steel facility from the Wayne County Land Bank. The settlement fosters redevelopment by allowing MSC and Crown to clarify their cleanup responsibilities while EPA investigates and fully addresses existing contamination within the site. The steps to be taken by MSC mark the first, but not final, steps in addressing conditions at the property.

To secure the covenants not to sue, the settlement requires MSC to do the following work in the southern portion of the site:

- Demolish about 45 structures.
- Remove asbestos-containing material, containerized wastes and materials containing PCBs from all structures prior to demolition.
- Install a fence around the property.
- Remove contaminated water and sludges from 23 subsurface structures (pits, basements and lagoons), clean or remove the structures and, if the structures remain, fill them with clean fill materials.
- Investigate five areas where PCBs may have been released.
- Assess and report on options for stormwater management to eliminate uncontrolled flow to the Trenton Channel of the Detroit River.

To address environmental issues not covered by the proposed settlement, EPA has listed the entire southern portion of the site consisting of approximately 197 acres on the NPL. Listing on the NPL will make work within the southern portion eligible for federal funding.

EGLE and Riverview-Trenton Railroad Co., or RTRR, have entered into a "**Corrective Action Consent Order**", or **CACO**. Pursuant to the CACO, RTRR has committed to undertake certain corrective actions within the approximately 76 acres that comprise the northern portion of the former McLouth Steel facility. EGLE will use the information collected during the first phase of the corrective action and other sources to help determine if additional phases of corrective action are necessary.

RTRR has agreed to do the following:

- Perform the first phase of the corrective action (environmental investigation and response activities) that includes investigation of the five known waste management units, or WMUs, on the northern portion of the site.
- Clean up WMUs, if needed.
- Investigate groundwater contamination.
- Control dust.
- Evaluate stormwater management options to eliminate flow to the Trenton Channel of the Detroit River.

EPA has signed a **Memorandum of Understanding**, or **MOU**, with EGLE. In the MOU, EGLE committed to ensuring that RTRR performs a cleanup in the northern portion of the site in accordance with EPA Superfund guidelines.

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APPENDICES

Appendix A- Glossary of Terms & Acronyms

Administrative Record: The body of documents that forms the basis for selection of a particular response at a site. For example, the Administrative Record for remedy selection includes all documents that were considered or relied upon to select the remedy through the Record of Decision.

Asbestos: Asbestos is a mineral fiber naturally occurring in rock and soil. Because of its fiber strength and heat resistance, asbestos has been used in a variety of building construction materials such as insulation and fire retardant. Asbestos has also been used in a wide range of manufactured goods, mostly in building materials (roofing shingles, ceiling and floor tiles, paper products and asbestos cement products), friction products (automobile clutch, brake and transmission parts), heat-resistant fabrics, packaging, gaskets and coatings. Asbestos fibers may be released into the air by the disturbance of asbestos-containing material during product use, demolition work, building or home maintenance, repair and remodeling. In general, exposure may occur only when the asbestos-containing material is disturbed or damaged in some way to release particles and fibers into the air. Exposure to asbestos increases your risk of developing lung disease which is exacerbated by smoking. In general, the greater the exposure to asbestos, the greater the chance of developing harmful health effects. More information on asbestos can be found in a fact sheet in Appendix F and online.

https://www.atsdr.cdc.gov/toxfaqs/tfacts61.pdf

CACO: See Corrective Action Consent Order.

CAG: See Community Advisory Group.

Community Advisory Group: A Community Advisory Group is made up of representatives of diverse community interests. Its purpose is to provide a public forum for community members to present and discuss their needs and concerns related to the Superfund decision-making process. A CAG can assist EPA in making better decisions on how to clean up a site. It offers EPA a unique opportunity to hear-and consider community preferences for site cleanup. However, the existence of a CAG does not eliminate the need for the Agency to keep the community informed about plans and decisions.

CERCLA: See Comprehensive Environmental Response, Compensation and Liability Act.

CIC: See Community Involvement Coordinator.

CIP: See Community Involvement Plan.

Cleanup: Actions taken to deal with a release, or threat of release, of a hazardous substance that could affect humans and/or the environment. The term "cleanup" is sometimes used interchangeably with "remedial action," "remediation," "removal action," "response action," or "corrective action."

Community: An interacting population of various types of individuals in a common location; a neighborhood or specific area where people live.

Community Engagement: The process of involving locals in all phases of the cleanup process. Communities are asked to provide input on how the cleanup will be conducted and how it may affect community plans and goals. See also Community Involvement.

Community Involvement: The term used by EPA to identify its process for engaging in dialogue and collaboration with communities affected by Superfund site. EPA's community involvement approach is founded in the belief that people have a right to know what the Agency is doing in their community. Its purpose is to give people the opportunity to become involved in the Agency's activities and to help shape decisions that are made.

Community Involvement Coordinator: The EPA official whose lead responsibility is to involve and inform the public about the Superfund process, in accordance with requirements set forth in the National Oil and Hazardous Substances Pollution Contingency Plan.

Community Involvement Plan: A plan that outlines specific community involvement activities that occur during site investigation and cleanup. The CIP outlines how EPA will keep the public informed of work at the site and ways in which residents can review and comment on decisions that may affect actions at the site. The CIP may be modified as necessary to respond to changes in community concerns, information needs and activities.

Comprehensive Environmental Response, Compensation, and Liability Act: A federal law passed in 1980, modified in 1986, by the Superfund Amendments and Reauthorization Act. Commonly known as Superfund, CERCLA is intended to protect people's health and the environment by investigating and cleaning up abandoned or uncontrolled hazardous waste site. Under the program, EPA can either:

- Pay for site cleanup when parties responsible for the contamination cannot be located or are unwilling/unable to do the work; or
- Take legal action to force parties responsible for site contamination to clean up the site or pay back the federal government for the cost of the cleanup.

Consent Decree: A legal document that formalizes an agreement reached between EPA and parties considered potentially responsible for contamination (PRPs), where PRPs will perform all or part of a Superfund site cleanup. The consent decree describes actions that PRPs are required to perform, the costs incurred by the government that the PRPs will reimburse, as well as the roles, responsibilities and enforcement options that the government may exercise in the event of noncompliance. A consent decree is subject to a public comment period.

Contaminant(s): Any physical, chemical, biological, or radiological substance or matter that has an adverse effect on air, water, or soil.

Contamination: The introduction of microorganisms, chemicals, toxic substances, wastes, or wastewater in a concentration that makes the medium unfit for its next intended use in water, air and soil. Also applies to surfaces of objects, buildings and various household use products.

Corrective Action Consent Order: The Resource Conservation and Recovery Act gives EPA the authority to issue an administrative order to a facility. Administrative orders can be issued unilaterally or on consent. An administrative order on consent is an agreement between EPA and the facility for achieving compliance.

EIS: See Environmental Impact Statement.

Environmental Impact Statement: An Environmental Impact Statement is a document that describes the impacts a proposed action would have on the environment.

Feasibility Study: A feasibility study is an analysis of the practicality of a proposal- e.g., a description and analysis of potential cleanup alternatives for a site such as one on the National Priorities List. The feasibility study usually recommends a selection of a cost-effective alternative.

FS: See Feasibility Study.

Galbestos: Galbestos is a galvanized steel sheet with asbestos pressed into the surface. The molten zinc in the galvanized steel and asbestos mechanically bind.

Groundwater: Underground supplies of drinking water.

Hazardous Substance(s): Any material that poses a threat to human health and/or the environment. Typical hazardous substances are toxic, corrosive, ignitable, explosive, or chemically reactive. Any substance designated by EPA are to be reported if a designated quantity of the substance is spilled in the waters of the United States or is otherwise released into the environment.

Hazardous Waste: Byproducts that can pose a substantial or potential hazard to human health or the environment when improperly managed. Hazardous wastes usually possess at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity) or appear on EPA lists.

Information Repository: A file containing current information, technical reports and reference documents regarding a site. The information repository usually is in a public building convenient for residents, such as a public school, town hall, or library.

Memorandum of Understanding: An agreement between EPA and another party that outlines an agreement that the parties have reached.

MOU: See Memorandum of Understanding.

National Priorities List: EPA's list of serious uncontrolled or abandoned hazardous waste sites identified for long-term cleanup under Superfund. The list is based primarily on the score a site receives from the Hazard Ranking System (HRS). EPA is required to update the National Priorities List at least once a year.

NPL: See National Priorities List.

On-Scene Coordinator: On-Scene Coordinators (OSCs) are federal officials responsible for monitoring or directing responses to all oil spills and hazardous substance releases reported to the federal government. OSCs coordinate all federal efforts with and provide support and information to, local, state and regional response communities. EPA's OSCs have primary responsibility for spills and releases to inland areas and waters.

OSC: See On-Scene Coordinator.

PCBs: See Polychlorinated Biphenyls.

Polychlorinated Biphenyls: Polychlorinated biphenyls, or PCBs, are mixtures of up to 209 individual chlorinated compounds known as congeners. There are no known natural sources of PCBs, although some PCBs can exist as a vapor in air. PCBs are either oily liquids or solids that are colorless to light yellow and have no known smell or taste. Many commercial PCB mixtures are known in the U.S. by the trade name "Aroclor". PCBs have been used as coolants and lubricants in transformers, capacitors and other electrical equipment because they do not easily burn and are good insulators. The manufacturing of PCBs was stopped in the U.S. in 1977 because of evidence of buildup in the environment which may cause harmful health effects. Products made before 1977 that may contain PCBs include fluorescent lighting fixtures and electrical devices with PCB capacitors as well as old microscope and hydraulic oils. The most commonly observed health effects in people exposed to large amounts of PCBs are skin conditions such as acne and rashes. Studies in exposed workers have shown changes in blood and urine that may also indicate liver damage. EPA classifies PCBs as probable cancer-causing agents. More information on PCBs can be found in a fact sheet in Appendix F and online.

https://www.atsdr.cdc.gov/toxfaqs/tfacts17.pdf

Proposed Plan: A plan for site cleanup that is available to the public for comment.

Public Comment Period(s): A formal opportunity for community members to review and contribute written comments on various EPA documents or actions.

Public Meeting(s): Formal public sessions that are characterized by presentations to the public followed by a question-and-answer session. Formal public meetings may involve the use of a court reporter and the issuance of transcripts. These meetings are required only for the Proposed Plan and Record of Decision amendments.

Public: The community or people in general, or a part of the community grouped together due to common interest or activities.

RCRA: See Resource Conservation and Recovery Act.

Record of Decision: A Record of Decision, or ROD, is a legal, technical and public document that explains which cleanup alternative will be used at a Superfund NPL site. The ROD is based on the technical analysis generated during the remedial investigation and feasibility study as well as consideration of public comments and concerns.

Remedial Investigation: The remedial investigation is a study designed to collect the data necessary to determine the nature and extent of contamination at a site.

Remedial Project Manager: The EPA official who is the technical lead on a long-term remediation project.

Resource Conservation and Recovery Act: The Resource Conservation and Recovery Act, or RCRA, gives EPA the authority to control hazardous waste from "cradle-to-grave". This includes the generation, transportation, treatment, storage and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

RI: See Remedial Investigation.

ROD: See Record of Decision.

RPM: See Remedial Project Manager.

SARA: See Superfund Amendments and Reauthorization Act.

Superfund Amendments and Reauthorization Act: Modifications to the Comprehensive Environmental Response, Compensation and Liability Act, or CERCLA, enacted on October 17, 1986.

Superfund: The program operated under the legislative authority of CERCLA that funds and carries out EPA solid waste emergency and long-term removal or remedial activities. These activities include: establishing the National Priorities List, investigating site for inclusion on the list, determining their priority, and conducting and/or supervising cleanup and other remedial actions.

TAG. See Technical Assistance Grant.

TASC. See Technical Assistance Services for Communities.

Technical Assistance Grant. This grant provides money for activities that help communities participate in decision making at eligible Superfund sites.

Technical Assistance Services for Communities. This program supplies communities with technical help, so they can better understand the science, regulations and policies of environmental issues and EPA actions.

Appendix B- Community Interview Questions

Community Interview Questionnaire Former McLouth Facility – March 25-27 and April 9-11, 2019

Name	::			
Home Phone: ()			Cell Phone: ()	
E-Mail	l Address:		Date	:
1.	Do you live or work on site? [What organizatio		e you affiliated with any o	rganization that has an interest in the
2.	How long have you be	en a resident in the area?		
3.	Do you live in an area potentially affected by the current or past activities at the facility? Have you been affected? In what way?			
4.	What concerns do you	have about the facility/in	vestigation/cleanup?	
5.	Where are you getting your information about the facility? From whom? In what form?			
6.	Do you feel that you have been adequately informed about the facility from EPA? If not, what other kind of information would you like/need?			
7.	How would you like to be informed concerning future site activities (mail, e-mail, telephone, newspapers (which?), television, radio, social media such as Facebook)?			
8.	Do you have any sugge	estions about how we mig	ght reach people?	
9.	-	neeting or availability sess time would be most conv	-	es No

- b. What format do you think works best? Public meeting verses availability session? (explain formats)
- c. If not, what obstacles keep you from attending?
- d. Do you have suggestions about locations for future meetings?
- 10. What groups in the area have regular meetings that are well attended? Do you know if these are the types of meetings where EPA could be added to the agenda so that we could give updates on the site periodically?
- 11. Have you read any EPA fact sheets about the site? If so, were they understandable? Do you have any suggestions regarding how we might distribute the fact sheets?
- 12. Site information is posted on the EPA's web site. Have you used the EPA web site? If so, did you find the information you needed?
- 13. We are establishing an information repository at the Trenton Library. Do you think people will visit the library for the information? Would you?
- 14. Are there any other people or groups you think we should talk to about the facility either because they have unique information or would like to know more from EPA?
- 15. What is special/important to you about your community?
- 16. Do you have any questions?
- 17. Is there anything else you would like to add regarding the facility or the EPA's involvement with the local community?

Appendix C- Information Repository, Administrative Record, Website, & Public Meetings

Local Information Repositories

Trenton Veterans Memorial Library

2790 Westfield Road Trenton, MI 48183 734-676-9777 https://trenton.lib.mi.us/

Riverview Veterans Memorial Library

14300 Sibley Road Riverview, MI 48193 734 283-1250 https://riverviewpubliclibrary.com/

Official Information Repository

EPA Region 5 Superfund Record Center

Room 711, 7th Floor Ralph Metcalfe Federal Building 77 W. Jackson Blvd. Chicago, IL 60604 www.epa.gov/superfund/mclouth-steel

Likely Meeting Locations

Westfield Activities Center 2700 Westfield Road Trenton, MI 48183 734-675-0063

Riverview Community Center 14300 Library Dr.

Riverview, MI 48193 734-281-4219

Other Locations

- Trenton or Riverview City Halls
- Grosse Ile Township Hall
- Trenton High School Auditorium
- St. Paul or St. Philip Lutheran Churches



Trenton Library.



Riverview Library.



Chicago EPA office



Community centers in the area.

Appendix D- List of Contacts

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Debbie Stabenow

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Detroit Office 719 Griswold St., Suite 700 Detroit, MI 810-720-4172



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<u>Dearborn Office</u> 19855 W. Outer Dr., Suite 103-E Dearborn, MI 48124 313-278-2936

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Garlin Gilchrist

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Stephanie Chang (District 1)

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Darrin Camilleri (District 23)

State Representative P.O. Box 30014 Lansing, MI 48909 517-373-0855 https://housedems.com/camilleri

Cara Clemente (District 14)

State Representative P.O. Box 30014 Lansing, MI 48909 517-373-0140 https://housedems.com/clemente

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Benny Napoleon

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Interested Parties

Southern Wayne County Regional Chamber of Commerce

20904 Northline Road Taylor, MI 48180-4719 734-284-6000 https://www.swcrc.com/contact-swcrc/

Friends of the Detroit River 734-288-3889 http://www.detroitriver.org/

Trenton Rotary Club https://portal.clubrunner.ca/610

Downriver Waterfront Conservancy www.downriverwc.com

Trenton Visionaries https://www.facebook.com/groups/119547535421831/

Grosse Ile Civic Association https://www.youtube.com/channel/UCqUxYbXZgbWPnALY_WK1N-w

Grosse lie Nature and Land Conservancy http://www.ginlc.org/

Newspapers

News Herald

One Heritage Dr., Suite 100 Southgate, MI 48195 734-246-0800 Jalley@thenewsherald.com Ckruemmer@digitalfirstmedia.com Publishes Wednesdays and Sundays

Detroit Free Press

160 W. Fort St. Detroit, MI 48226 313-222-6400 City@freepress.com Publishes daily

Trenton Tribune/Island Beacon

2615 W. Jefferson Ave., Suite 2 Trenton, MI 48183 734-676-0850 Publishes monthly









Riverview Register

18271 Fort St. Riverview, MI 48193 734-282-3939 www.riverviewregister.com Publishes monthly

Grosse lle Grand

18271 Fort St. Riverview, MI 48193 734-282-3939 www.gi-grandnews.com/ Publishes monthly

<u>Radio</u>

Interviewees said there was no main radio station that they listened to for news.

Television

WXYZ-TV 7 & WMYD- TV 20 (ABC)

20777 W. Ten Mile Road Southfield, MI 48075 248-827-7777 www.wxyz.com

WDIV- Local TV4 (NBC)

550 W. Lafayette Detroit, MI, 48226 www.clickondetroit.com/

WWJ- TV 62 (CBS)

26905 W. Eleven Mile Road Southfield, MI 48033 248-355-7000 https://detroit.cbslocal.com/station/cbs-62/

WJBK- TV2 (FOX)

P.O. Box 2000 16550 West Nine Mile Road Southfield, MI 48037 248-557-2000 http://www.fox2detroit.com/

WTVS 56- Detroit Public Television

Riley Broadcast Center 1 Clover Court Wixom, MI 48393-2247 248-305-3900 www.dptv.org/home

Appendix E- Community Engagement in the Superfund Process

Superfund is an environmental cleanup program enabled by a federal law enacted in 1980, known as the Comprehensive Environmental Response, Compensation, and Liability Act, or CERCLA. In 1986 another law, the **Superfund Amendments and Reauthorization Act**, or **SARA**, reauthorized CERCLA to continue Superfund cleanup activities. This law gives EPA the authority to require those parties responsible for creating a **hazardous waste** site to clean up that site, or to reimburse the government if EPA cleans up the site. EPA compels responsible parties to clean up hazardous waste site through administrative orders, **consent decrees** and other legal settlements. EPA is authorized to enforce the



Superfund law within all 50 states, U.S. territories and tribal nations. Superfund site identification, monitoring and response activities are coordinated with state, tribal and territorial environmental protection or waste management agencies.

There are several steps involved in cleaning up a contaminated site. Once EPA has been made aware of a contaminated site from citizens, local, tribal, or state agencies, EPA follows a step-by-step process (see Page 26) to determine the best way to clean up the site and protect human health and the environment.

If the site poses an immediate threat to public health or the environment, EPA can intervene with an emergency response action. The goal of EPA's Emergency Response and Removal Program is to protect the public and environment from immediate threats posed by the release or discharge of hazardous substances.

The Superfund program encourages active dialogue between communities affected by the release of hazardous substances and all of the agencies responsible for overseeing cleanup actions. EPA considers community involvement to be an important part of the Superfund program and opportunities for community involvement occur throughout the process. At each step in the process, there are opportunities for various levels of community engagement.

Additional EPA Websites

Superfund: www.epa.gov/superfund

Cleanup Process: www.epa.gov/superfund/cleaning-superfund-sites

Community Involvement: www.epa.gov/superfund/superfund-community-involvement



Appendix F- Fact Sheets

- 1) Contaminant of Concern: Asbestos
- 2) Contaminant of Concern: PCBs
- 3) Proposed Settlement of Liability and Cleanup Process for former McLouth Steel facility- August 2018
- 4) Frequently Asked Questions Fact Sheet- September 2018
- 5) Remedial Investigation- August 2019



ASBESTOS CAS # 1332-21-4

Division of Toxicology ToxFAQsTM

September 2001

This fact sheet answers the most frequently asked health questions (FAQs) about asbestos. For more information, call the ATSDR Information Center at 1-888-422-8737. This fact sheet is one in a series of summaries about hazardous substances and their health effects. It's important you understand this information because this substance may harm you. The effects of exposure to any hazardous substance depend on the dose, the duration, how you are exposed, individual susceptibility and personal habits, and whether other chemicals are present.

HIGHLIGHTS: Exposure to asbestos usually occurs by breathing contaminated air in workplaces that make or use asbestos. Asbestos is also found in the air of buildings that are being torn down or renovated. Asbestos exposure can cause serious lung problems and cancer. This substance has been found at 83 of the 1,585 National Priorities List sites identified by the Environmental Protection Agency (EPA).

What is asbestos?

Asbestos is the name given to a group of six different fibrous minerals (amosite, chrysotile, crocidolite, and the fibrous varieties of tremolite, actinolite, and anthophyllite) that occur naturally in the environment. Asbestos minerals have separable long fibers that are strong and flexible enough to be spun and woven and are heat resistant. Because of these characteristics, asbestos has been used for a wide range of manufactured goods, mostly in building materials (roofing shingles, ceiling and floor tiles, paper products, and asbestos cement products), friction products (automobile clutch, brake, and transmission parts), heat-resistant fabrics, packaging, gaskets, and coatings. Some vermiculite or talc products products may contain asbestos.

What happens to asbestos when it enters the environment?

Asbestos fibers can enter the air or water from the breakdown of natural deposits and manufactured asbestos products. Asbestos fibers do not evaporate into air or dissolve in water. Small diameter fibers and particles may remain suspended in the air for a long time and be carried long distances by wind or water before settling down. Larger diameter fibers and particles tend to settle more quickly.

Asbestos fibers are not able to move through soil. Asbestos fibers are generally not broken down to other compounds and will remain virtually unchanged over long periods.

How might I be exposed to asbestos?

We are all exposed to low levels of asbestos in the air we breathe. These levels range from 0.00001 to 0.0001 fibers per milliliter of air and generally are highest in cities and industrial areas.

People working in industries that make or use asbestos products or who are involved in asbestos mining may be exposed to high levels of asbestos. People living near these industries may also be exposed to high levels of asbestos in air.

Asbestos fibers may be released into the air by the disturbance of asbestos-containing material during product use, demolition work, building or home maintenance, repair, and remodeling. In general, exposure may occur only when the asbestos-containing material is disturbed in some way to release particles and fibers into the air.

Drinking water may contain asbestos from natural sources or from asbestos-containing cement pipes.

How can asbestos affect my health?

Asbestos mainly affects the lungs and the membrane that surrounds the lungs. Breathing high levels of asbestos fibers for a long time may result in scar-like tissue in the lungs and in the pleural membrane (lining) that surrounds the lung. This disease is called asbestosis and is usually found in workers exposed to asbestos, but not in the general public. People with asbestosis have difficulty breathing, often a cough, and in severe cases heart enlargement. Asbestosis is a serious disease and can eventually lead to disability and death.

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, Public Health Service Agency for Toxic Substances and Disease Registry

Page 2

ASBESTOS CAS # 1332-21-4

ToxFAQs[™] Internet address is http://www.atsdr.cdc.gov/toxfaq.html

Breathing lower levels of asbestos may result in changes called plaques in the pleural membranes. Pleural plaques can occur in workers and sometimes in people living in areas with high environmental levels of asbestos. Effects on breathing from pleural plaques alone are not usually serious, but higher exposure can lead to a thickening of the pleural membrane that may restrict breathing.

How likely is asbestos to cause cancer?

The Department of Health and Human Services (DHHS), the World Health Organization (WHO), and the EPA have determined that asbestos is a human carcinogen.

It is known that breathing asbestos can increase the risk of cancer in people. There are two types of cancer caused by exposure to asbestos: lung cancer and mesothelioma. Mesothelioma is a cancer of the thin lining surrounding the lung (pleural membrane) or abdominal cavity (the peritoneum). Cancer from asbestos does not develop immediately, but shows up after a number of years. Studies of workers also suggest that breathing asbestos can increase chances of getting cancer in other parts of the body (stomach, intestines, esophagus, pancreas, and kidneys), but this is less certain. Early identification and treatment of any cancer can increase an individual's quality of life and survival.

Cigarette smoke and asbestos together significantly increase your chances of getting lung cancer. Therefore, if you have been exposed to asbestos you should stop smoking. This may be the most important action that you can take to improve your health and decrease your risk of cancer.

How can asbestos affect children?

We do not know if exposure to asbestos will result in birth defects or other developmental effects in people. Birth defects have not been observed in animals exposed to asbestos.

It is likely that health effects seen in children exposed to high levels of asbestos will be similar to the effects seen in adults.

How can families reduce the risk of exposure to asbestos?

Materials containing asbestos that are not disturbed or deteriorated do not, in general, pose a health risk and can be left alone. If you suspect that you may be exposed to asbestos in your home, contact your state or local health department or the regional offices of EPA to find out how to test your home and how to locate a company that is trained to remove or contain the fibers.

Is there a medical test to show whether I've been exposed to asbestos?

Low levels of asbestos fibers can be measured in urine, feces, mucus, or lung washings of the general public. Higher than average levels of asbestos fibers in tissue can confirm exposure but not determine whether you will experience any health effects.

A thorough history, physical exam, and diagnostic tests are needed to evaluate asbestos-related disease. Chest x-rays are the best screening tool to identify lung changes resulting from asbestos exposure. Lung function tests and CAT scans also assist in the diagnosis of asbestos-related disease.

Has the federal government made recommendations to protect human health?

In 1989, EPA banned all new uses of asbestos; uses established before this date are still allowed. EPA established regulations that require school systems to inspect for damaged asbestos and to eliminate or reduce the exposure by removing the asbestos or by covering it up. EPA regulates the release of asbestos from factories and during building demolition or renovation to prevent asbestos from getting into the environment.

EPA has proposed a concentration limit of 7 million fibers per liter of drinking water for long fibers (lengths greater than or equal to $5 \ \mu$ m). The Occupational Safety and Health Administration has set limits of 100,000 fibers with lengths greater than or equal to $5 \ \mu$ m per cubic meter of workplace air for 8-hour shifts and 40hour work weeks.

References

Agency for Toxic Substances and Disease Registry (ATSDR). 2001. Toxicological Profile for Asbestos. Update. Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service.

Where can I get more information? For more information, contact the Agency for Toxic Substances and Disease Registry, Division of Toxicology, 1600 Clifton Road NE, Mailstop F-32, Atlanta, GA 30333. Phone: 1-888-422-8737, FAX: 770-488-4178. ToxFAQsTM Internet address is http://www.atsdr.cdc.gov/toxfaq.html . ATSDR can tell you where to find occupational and environmental health clinics. Their specialists can recognize, evaluate, and treat illnesses resulting from exposure to hazardous substances. You can also contact your community or state health or environmental quality department if you have any more questions or concerns.

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Polychlorinated Biphenyls - ToxFAQs™

This fact sheet answers the most frequently asked health questions (FAQs) about polychlorinated biphenyls. For more information, call the CDC Information Center at 1-800-232-4636. This fact sheet is one in a series of summaries about hazardous substances and their health effects. It's important you understand this information because this substance may harm you. The effects of exposure to any hazardous substance depend on the dose, the duration, how you are exposed, personal traits and habits, and whether other chemicals are present.

HIGHLIGHTS: Polychlorinated biphenyls (PCBs) are a mixture of individual chemicals which are no longer produced in the United States, but are still found in the environment. Health effects that have been associated with exposure to PCBs include acne-like skin conditions in adults and neurobehavioral and immunological changes in children. PCBs are known to cause cancer in animals. PCBs have been found in at least 500 of the 1,598 National Priorities List (NPL) sites identified by the Environmental Protection Agency (EPA).

What are polychlorinated biphenyls?

Polychlorinated biphenyls are mixtures of up to 209 individual chlorinated compounds (known as congeners). There are no known natural sources of PCBs. PCBs are either oily liquids or solids that are colorless to light yellow. Some PCBs can exist as a vapor in air. PCBs have no known smell or taste. Many commercial PCB mixtures are known in the U.S. by the trade name Aroclor.

PCBs have been used as coolants and lubricants in transformers, capacitors, and other electrical equipment because they don't burn easily and are good insulators. The manufacture of PCBs was stopped in the U.S. in 1977 because of evidence they build up in the environment and can cause harmful health effects. Products made before 1977 that may contain PCBs include old fluorescent lighting fixtures and electrical devices containing PCB capacitors, and old microscope and hydraulic oils.

What happens to PCBs when they enter the environment?

- PCBs entered the air, water, and soil during their manufacture, use, and disposal; from accidental spills and leaks during their transport; and from leaks or fires in products containing PCBs.
- PCBs can still be released to the environment from hazardous waste sites; illegal or improper disposal of industrial wastes and consumer products; leaks from old electrical transformers containing PCBs; and burning of some wastes in incinerators.
- PCBs do not readily break down in the environment and thus may remain there for very long periods of time. PCBs can travel long distances in the air and be deposited in areas far away from where they were released. In water, a small amount of PCBs may remain dissolved, but most stick to organic particles and bottom sediments. PCBs also bind strongly to soil.

 PCBs are taken up by small organisms and fish in water. They are also taken up by other animals that eat these aquatic animals as food. PCBs accumulate in fish and marine mammals, reaching levels that may be many thousands of times higher than in water.

How might I be exposed to PCBs?

- Using old fluorescent lighting fixtures and electrical devices and appliances, such as television sets and refrigerators, that were made 30 or more years ago. These items may leak small amounts of PCBs into the air when they get hot during operation, and could be a source of skin exposure.
- Eating contaminated food. The main dietary sources of PCBs are fish (especially sportfish caught in contaminated lakes or rivers), meat, and dairy products.
- Breathing air near hazardous waste sites and drinking contaminated well water.
- In the workplace during repair and maintenance of PCB transformers; accidents, fires or spills involving transformers, fluorescent lights, and other old electrical devices; and disposal of PCB materials.

How can PCBs affect my health?

The most commonly observed health effects in people exposed to large amounts of PCBs are skin conditions such as acne and rashes. Studies in exposed workers have shown changes in blood and urine that may indicate liver damage. PCB exposures in the general population are not likely to result in skin and liver effects. Most of the studies of health effects of PCBs in the general population examined children of mothers who were exposed to PCBs.

Animals that ate food containing large amounts of PCBs for short periods of time had mild liver damage and some died. Animals that ate smaller amounts of PCBs in food over



Agency for Toxic Substances and Disease Registry Division of Toxicology and Human Health Sciences

CS265956-A

Polychlorinated Biphenyls

several weeks or months developed various kinds of health effects, including anemia; acne-like skin conditions; and liver, stomach, and thyroid gland injuries. Other effects of PCBs in animals include changes in the immune system, behavioral alterations, and impaired reproduction. PCBs are not known to cause birth defects.

How likely are PCBs to cause cancer?

Few studies of workers indicate that PCBs were associated with certain kinds of cancer in humans, such as cancer of the liver and biliary tract. Rats that ate food containing high levels of PCBs for two years developed liver cancer. The Department of Health and Human Services (DHHS) has concluded that PCBs may reasonably be anticipated to be carcinogens. PCBs have been classified as probably carcinogenic, and carcinogenic to humans (group 1) by the Environmental Protection Agency (EPA) and International Agency for Research on Cancer (IARC), respectively.

How can PCBs affect children?

Women who were exposed to relatively high levels of PCBs in the workplace or ate large amounts of fish contaminated with PCBs had babies that weighed slightly less than babies from women who did not have these exposures. Babies born to women who ate PCB-contaminated fish also showed abnormal responses in tests of infant behavior. Some of these behaviors, such as problems with motor skills and a decrease in short-term memory, lasted for several years. Other studies suggest that the immune system was affected in children born to and nursed by mothers exposed to increased levels of PCBs. There are no reports of structural birth defects caused by exposure to PCBs or of health effects of PCBs in older children. The most likely way infants will be exposed to PCBs is from breast milk. Transplacental transfers of PCBs were also reported In most cases, the benefits of breast-feeding outweigh any risks from exposure to PCBs in mother's milk.

How can families reduce the risks of exposure to PCBs?

- You and your children may be exposed to PCBs by eating fish or wildlife caught from contaminated locations. Certain states, Native American tribes, and U.S. territories have issued advisories to warn people about PCB-contaminated fish and fish-eating wildlife. You can reduce your family's exposure to PCBs by obeying these advisories.
- Children should be told not play with old appliances, electrical equipment, or transformers, since they may contain PCBs.

- Children should be discouraged from playing in the dirt near hazardous waste sites and in areas where there was a transformer fire. Children should also be discouraged from eating dirt and putting dirty hands, toys or other objects in their mouths, and should wash hands frequently.
- If you are exposed to PCBs in the workplace it is possible to carry them home on your clothes, body, or tools. If this is the case, you should shower and change clothing before leaving work, and your work clothes should be kept separate from other clothes and laundered separately.

Is there a medical test to show whether I've been exposed to PCBs?

Tests exist to measure levels of PCBs in your blood, body fat, and breast milk, but these are not routinely conducted. Most people normally have low levels of PCBs in their body because nearly everyone has been environmentally exposed to PCBs. The tests can show if your PCB levels are elevated, which would indicate past exposure to above-normal levels of PCBs, but cannot determine when or how long you were exposed or whether you will develop health effects.

Has the federal government made recommendations to protect human health?

The EPA has set a limit of 0.0005 milligrams of PCBs per liter of drinking water (0.0005 mg/L). Discharges, spills or accidental releases of 1 pound or more of PCBs into the environment must be reported to the EPA. The Food and Drug Administration (FDA) requires that infant foods, eggs, milk and other dairy products, fish and shellfish, poultry and red meat contain no more than 0.2-3 parts of PCBs per million parts (0.2-3 ppm) of food. Many states have established fish and wildlife consumption advisories for PCBs.

References

Agency for Toxic Substances and Disease Registry (ATSDR). 2000. Toxicological profile for polychlorinated biphenyls (PCBs). Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service.

Where can I get more information?

For more information, contact the Agency for Toxic Substances and Disease Registry, Division of Toxicology and Human Health Sciences, 1600 Clifton Road NE, Mailstop F-57, Atlanta, GA 30329-4027.

Phone: 1-800-232-4636.

ToxFAQs[™] Internet address via WWW is http://www.atsdr.cdc.gov/toxfaqs/index.asp.

ATSDR can tell you where to find occupational and environmental health clinics. Their specialists can recognize, evaluate, and treat illnesses resulting from exposure to hazardous substances. You can also contact your community or state health or environmental quality department if you have any more questions or concerns.

Page 2 of 2





Public meeting

EPA encourages you to attend the public meeting, **Wednesday, Sept. 5, 6-8 p.m.**, at St. Paul Lutheran Church Reception Hall, 2550 Edsel Dr., Trenton, Mich.

For more information

If you have questions or comments on the Former McLouth Steel facility, contact:

For technical questions: Brian Kelly EPA On-Scene Coordinator kelly.brian@epa.gov 734-692-7684

Rich Conforti MDEQ Project Manager confortir@michigan.gov 517-284-6558

For general questions: Kirstin Safakas EPA Community Involvement Coordinator safakas.kirstin@epa.gov 312-886-6015

Diane Russell

EPA Community Involvement Coordinator russell.diane@epa.gov 989-395-3493

Websites

EPA Website: www.epa.gov/superfund/mclouthsteel

Proposed Settlement of Liability and Cleanup Process

Former McLouth Steel Facility Cities of Riverview and Trenton, Michigan

August 2018

The U.S. Environmental Protection Agency, U.S. Department of Justice and Michigan Department of Environmental Quality have negotiated a proposed legal agreement called a "Settlement Agreement and Covenant Not to Sue" with Crown Enterprises, Inc. and MSC Land Co., LLC. The public has an opportunity to comment and the agencies will finalize the settlement after considering comments received. Under the terms of the proposed settlement, MSC will do some cleanup on and assessment activities within the southern portion of the site. In exchange, MSC and Crown, parties not responsible for the contamination on the property, will receive covenants not to sue. The covenants will enable MSC to take title to 183 acres of the former McLouth Steel facility from the Wayne County Land Bank. 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 mark the first but not the final steps in addressing conditions at the property.

To secure the covenants not to sue, the settlement will require MSC to do the following work in the southern portion of the site (*see Site Map on Page 2*):

- Demolish about 45 structures.
- Remove asbestos-containing material, containerized wastes and materials containing PCBs from all structures prior to demolition.
- Install a fence around the property.
- Remove contaminated water and sludges from 23 subsurface structures (pits, basements and lagoons), clean or remove the structures and, if the structures remain, fill them with clean fill materials.
- Investigate five areas where PCBs may have been released.
- Assess and report on options for stormwater management to eliminate uncontrolled flow to the Trenton Channel of the Detroit River.

To address environmental issues not covered by the proposed settlement, EPA intends to propose the entire southern portion of the site consisting of approximately 197 acres for listing on the Superfund National Priorities List. Listing on the National Priorities List will make work within the southern portion eligible for federal funding.



A photograph showing much of the former McLouth Steel Trenton, Mich. plant.

Public review and comment

A 30-day public comment period on the proposed settlement will begin Aug. 14, 2018. *See the box at right on how to submit comments.*

On Sept. 5, 2018, there will be a public meeting where people can learn more about the settlement, ask questions, give oral comments and submit written comments.

Once EPA has reviewed the public comments, the Agency will determine if it will finalize the settlement. MSC, Crown, EPA, DOJ and MDEQ have already signed the settlement. The settlement will become final unless public comments persuade EPA, DOJ and MDEQ that the settlement is not in the public interest.

Northern portion

MDEQ and Riverview-Trenton Railroad Co., or RTRR, are entering into a Consent Order, called a "Corrective Action Consent Order," or CACO. Pursuant to the CACO, RTRR has committed to undertake certain corrective actions within the approximately 76 acres that comprise the northern portion of the former McLouth Steel facility.

RTRR has agreed to do the following:

- Perform the first phase of the corrective action (environmental investigation and response activities) that includes investigation of the five known waste management units, or WMUs, on the northern portion of the site.
- Clean up the WMUs if needed.
- Investigate groundwater contamination.
- Control dust.
- Evaluate stormwater management options to eliminate flow to the Trenton Channel of the Detroit River.

MDEQ will use the information collected during the first phase of the corrective action and other sources to help determine if additional phases of corrective action are necessary.

EPA will be signing a Memorandum of Understanding, or MOU, with MDEQ. In the MOU, MDEQ will commit to ensuring that RTRR performs a cleanup in the northern portion of the site in accordance with Superfund guidelines.

How to comment

EPA will receive all comments and share them with MDEQ. There are several different ways to submit comments on the proposed settlement:

- In writing at the Sept. 5 public meeting
 - On the Web at www.epa.gov/superfund/mclouth-steel
- By Fax to 312-353-1263
- By Email to safakas.kirstin@epa.gov
 - By Mail to Kirstin Safakas U.S. EPA Region 5 Superfund Division (SI-6J) 77 W. Jackson Blvd. Chicago, IL 60604-3590

All comments must be postmarked by Sept. 13, 2018.

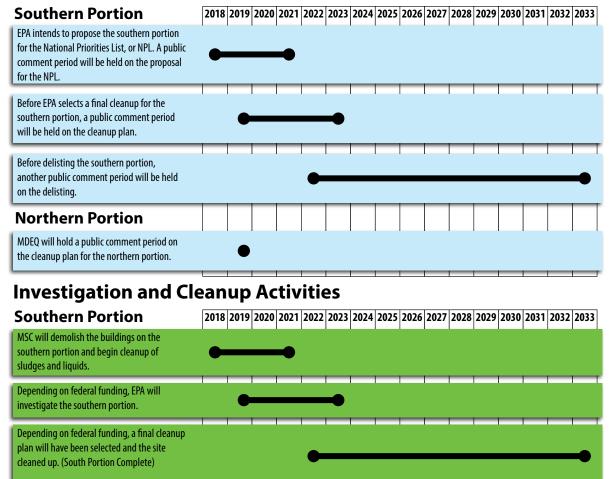


History of the McLouth Steel facility

The former McLouth Steel facility originally consisted of approximately 273 acres and operated from about 1950 until 1995. In 1995, McLouth filed for bankruptcy. In 1996, the McLouth bankruptcy estate sold the entire McLouth facility to Hamlin Holdings, Inc., which transferred title to DSC, Ltd. DSC tried without success to restart steel operations. In 2000, DSC sold the 76-acre northern portion of the facility to Manuel J. Maroun, who transferred title through Crown Enterprises, Inc. to 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.

Community Engagement Opportunities



Northern Portion

RTRR will investigate the northern portion with oversight by MDEQ.

RTRR will implement cleanup under MDEQ oversight. (North Portion Complete)

You're invited to a meeting about ...

EPA's Proposed Settlement for the Former McLouth Steel Facility 6-8 p.m. Wednesday, Sept. 5, 2018

EPA and MDEQ will present details about the proposed settlement negotiated with Crown Enterprises and MSC. The proposed settlement lays out a process for purchasing, evaluating and cleaning up the southern portion of the site. MDEQ will also explain an agreement it reached with Riverview-Trenton Railroad to clean up the northern portion of the site.

A question-and-answer session will follow the presentation. Comments on the proposed settlement with Crown Enterprises and MSC will also be accepted at the meeting.

The meeting will be held at: St. Paul Lutheran Church Reception Hall 2550 Edsel Dr. Trenton, Mich.

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Proposed Settlement for Superfund Cleanup Process

Region 5 Superfund Division (SI-6J) 77 W. Jackson Blvd. Chicago, IL 60604-3590

United States Environmental Protection Agency



Comment Sheet

EPA is interested in your comments on the proposed settlement for the southern portion of the former McLouth Steel facility. EPA will consider public comments before deciding if it will approve the settlement. Alternatively, EPA may elect to reopen negotiations to address significant public concerns, if any.

Please use the space below to write your comments, then fold and mail, or hand it in at the public meeting. This sheet may also be faxed to Kirstin Safakas at 312-353-1263. Or, you may submit comments through the Web at www.epa.gov/superfund/ mclouth-steel. Comments must be postmarked by Sept. 13. If you have any questions, please contact Kirstin at 312-886-6015.

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Kirstin Safakas

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Frequently Asked Questions McLouth Steel Cleanup

The U.S. Environmental Protection Agency and the Michigan Department of Environmental Quality have answers to questions you may have about the McLouth Steel settlement agreement and upcoming work. These FAQs will be updated as needed. This version was created September 12, 2018.

Cleanup

1. Why is the property split into northern and southern portions?

The property is split because those areas of the former McLouth Steel facility are owned by different entities. Those entities are subject to different environmental laws.

2. Who will be involved in cleaning the property (both northern and southern portions)?

The MSC Land Co. LLC will clean areas in the southern portions while the Riverview-Trenton Railroad Co., or RTRR, cleans areas in the northern portion. The southern portion will be cleaned up through a mix of private and public funds. Some work will begin almost immediately. Other work will occur over the next few years. EPA and MDEQ will ensure the cleanups are done properly and redevelopment is done safely. For more information, see the fact sheet.

3. What is the contamination and where is it located? Is contamination going off the property into the river and surrounding areas?

Contamination identified during previous work in the northern and southern portions include PCBs and heavy metals. We want to prevent these contaminants from getting into the environment through soil, air, and water. As work moves forward, more information will be gathered to understand locations of contamination better and stop any possible movement from the area.



4. How will you make sure contamination does not spread during cleanup work? MSC will submit a dust management plan to EPA to prevent contaminants moving during southern portion work. MSC will also be subject to the Clean Water Act and has agreed to perform an assessment to determine how to comply with the act.

- 5. What will be done to clean up the old oil settling ponds on the southern portion and remove associated ground contamination? One of the settling ponds called WMU: 1 (Sedimentation Basin) is one of the items specifically included in the work to be conducted by MSC. Groundwater will be investigated and cleaned up as part of EPA's work under Superfund.
- 6. Will the areas be cleaned up where transformers were stored and possibly contaminated the soil with PCBs? Yes. The settlement agreement requires MSC to investigate five areas for PCBs; any PCBs within structures will be cleaned up by MSC. PCB areas discovered during redevelopment or during EPA's investigation will be handled either by MSC as part of the redevelopment or by a future cleanup plan under EPA's Superfund program.

- 7. Will truck traffic increase during cleanup work? What routes will the trucks use? Truck traffic is likely to increase during the demolition, cleanup and redevelopment. The settlement agreement requires MSC to consult with officials from the cities of Riverview and Trenton on traffic management, then submit plans to EPA and MDEQ for approval.
- 8. Will local ordinances, like traffic and noise, be followed during the work? Will traffic change after the cleanup?

Local ordinances will be followed for the northern and southern portions of the former facility. Traffic patterns may change after the cleanup depending upon end use.

9. Will dust be controlled during the demolition of buildings and resulting traffic from trucks and equipment?

Yes. The settlement agreement and the corrective action consent order, or CACO, have requirements to submit dust control work plans to EPA and MDEQ before starting the cleanup.

10. What will happen to the contaminated material and soil taken from the property?

Any hazardous waste removed from the properties will go to a licensed disposal facility approved by the agencies.

11. If work is not completed as agreed to in the settlement, will there be penalties or enforcement actions imposed? Who will monitor the work?

The settlement agreement provides liability protections for MSC and Crown for the southern portion of the property. If they fail to perform what is required, they will lose the liability protections and may become liable for all environmental contamination. For the northern portion, the CACO has penalties and enforcement can be taken for failure to perform. MDEQ will oversee activities at the northern portion and some at the southern portion.

Timing

12. When will EPA start cleanup of the southern portion?

EPA expects to propose the southern portion to the National Priorities List, or NPL, in September 2018. Once added, the southern portion becomes eligible for federal funds for investigation and cleanup. This process can take time and it may be several years before work begins under the program. (*See timeline on Page 3.*)



13. When will MDEQ start cleanup of the northern portion?

A work plan is due within 90 days after the CACO is signed by both RTRR and MDEQ. The plan will describe steps RTRR will take to investigate and begin cleanup activities.

14. Will the buildings on the property be torn down by a certain date?

Within two years, MSC will demolish approximately 45 buildings on the southern portion of the property. They will also take steps for site security, dust control, surface water runoff, removal of water and waste from subsurface structures, and will investigate PCBs.

15. When will all the work be completed?

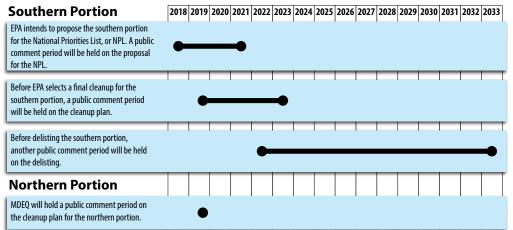
This is just the start. The initial phase is to be conducted over the next two years. MSC will determine the pace of redevelopment. EPA Superfund cleanup will take many more years. The northern portion could also take a few years to complete since there is no deadline to complete the work defined in the CACO.

Communication

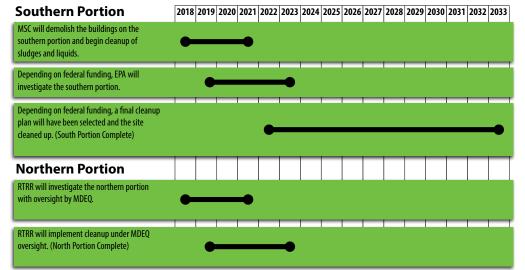
16. Will there be meetings held with the municipalities and/or residents to update the progress of the work? How will the community be involved?

More meetings can be held as needed. In addition, if the southern portion of the property gets listed as a Superfund site, there will be other opportunities for public comment before work begins. The MDEQ will hold a public meeting and comment period when the work plan has been received from RTRR. EPA will work with MDEQ to create a community involvement plan. The plan will be developed by working closely with the community and identifying opportunities for public input.

Community Engagement Opportunities



Investigation and Cleanup Activities



17. How will municipalities be notified of any incidents or accidents during the demolition period? Will there be a phone number that residents can call with complaints and/or concerns?

A plan will be developed during work to make sure municipalities are notified if there is any incidents or accidents on the northern or southern portions of the property. Municipalities and community members will be provided information on how to contact the agencies if there are concerns during work.

Restoration and Future use

18. What will eventually be done with the property?

MSC will work with the local municipalities, zoning boards and building departments to secure approval for redevelopment. As long as it is protective of human health and the environment, EPA and MDEQ do not have a role in deciding redevelopment.

19. Will there be restrictions on types of activities or materials on the property in the future? The settlement agreement does not address what redevelopment will occur or how things will be zoned. It does include provisions on how redevelopment will occur and requirements for sampling and handling waste.

20. Will native habitat be restored on the property or along the river once cleanup is done?

Habitat restoration is not covered by this initial settlement agreement; however, EPA will notify the federal Natural Resources Trustees that work will be happening at the former McLouth facility. The Natural Resources Trustees are a group of agencies that focus on restoration projects related to the property.

For more information

If you have questions or comments on the Former McLouth Steel facility, contact:

Website

www.epa.gov/superfund/mclouth-steel

For technical questions: Brian Kelly EPA On-Scene Coordinator kelly.brian@epa.gov 734-692-7684

Rich Conforti MDEQ Project Manager confortir@michigan.gov 517-284-6558

For general questions: Kirstin Safakas

EPA Community Involvement Coordinator safakas.kirstin@epa.gov 312-886-6015

Diane Russell

EPA Community Involvement Coordinator russell.diane@epa.gov 989-395-3493









National Priorities List Placement Paves the Way for Investigation

McLouth Steel Superfund Site Trenton and Riverview, Michigan

August 2019



Former McLouth Steel facility.

U.S. Environmental Protection Agency (EPA) placed the southern portion of the former McLouth Steel facility on the National Priorities List in May. Placement on the NPL makes the site eligible for federal money to investigate and clean up the property under EPA's Superfund program. Over the next 12 months, the Agency will develop the workplan for the site investigation, which is the first step in the process. The workplan will include the following components:

- A Site Management Plan that describes how the investigation will be managed including access, security, contingency procedures, responsibilities, storage and disposal of investigation-derived waste and other procedures to be followed in the field.
- A Sampling and Analysis Plan that defines how and what types of sampling will be done.
- A Quality Assurance Plan that describes the quality assurance and quality control protocols and objectives, methods, and procedures to be followed during the investigation.
- A Health and Safety Plan that defines procedures and precautions to be taken to ensure the safety of the workers and residents during the investigation.
- A Data Management Plan that describes how data will be managed throughout the investigation.

The workplan is expected to be completed in the fall of 2020.

Contact EPA

For more information about the site, contact one of these EPA team members:

Kirstin Safakas Community Involvement Coordinator 312-886-6015 safakas.kirstin@epa.gov

Nabil Fayoumi Remedial Project Manager 312-886-6840 fayoumi.nabil@epa.gov

Brian Kelly On-Scene Coordinator 734-692-7684 kelly.brian@epa.gov

You may call EPA's Chicago office toll-free at 800-621-8431, 9:30 a.m. – 5:30 p.m. weekdays.

For More Information

To find more details about the site, visit the EPA webpage at www.epa.gov/superfund/mclouthsteel.

Documents and reports about the site can also be found at the Trenton Veterans Memorial Library, 2790 Westfield Road in Trenton, and the Riverview Veterans Memorial Library, 14300 Sibley Road in Riverview.

Long-Term Investigation

Once the workplan is approved, EPA will begin the long-term investigation at the site. This inquiry is expected to begin in 2021. EPA will sample soil, groundwater (underground water), surface water, sediment (mud), and air to determine what type, how much, and where the contamination is located. The Agency will also define ways people could be exposed to the contamination. The investigation is expected to take about 12-18 months. After the examination is complete, EPA will publish a Remedial Investigation Report detailing the findings. A Risk Assessment Report explaining the health risks to people and the environment from the site will also be completed. These reports will be placed in the Trenton and Riverview libraries and the EPA website.

Study of Cleanup Alternatives

Based on the findings of the investigation, options to clean up or resolve pollution problems will be presented in a report called a Feasibility Study. The report will be placed in the libraries and on the EPA website. EPA will then recommend the cleanup steps Agency experts believe are the most effective to resolve the contamination issues at the site. These will be in a document called a Proposed Plan. The Proposed Plan will also be placed in the libraries and posted on the EPA website.

The community will have an opportunity to comment on EPA's recommended alternative as well as all the other alternatives considered. Although many factors could affect the project schedule, EPA anticipates the Proposed Plan to be ready for comment in the fall of 2022. At that time, EPA will notify community members of the availability of the plan and provide a summary. EPA will also hold a public meeting to explain the plan to the community and answer questions people may have. People will be given an opportunity to provide public comments at the meeting. Comments will also be accepted via mail and email. EPA will review and evaluate the comments and select the final cleanup.

Facility Teardown Update

A business called MSC Land Company, LLC is conducting some preliminary cleanup work. The focus has been on removing asbestos pipe wrap, disposal of PCB transformers, disposal of drums and containers, demolition of buildings, liquid disposal, and pit cleaning. A berm has been installed to protect the riverfront. There were 45 buildings at the start of the project, and most of the smaller buildings have been demolished. After that phase, MSC will tear down the main mill buildings.



Pipe wrap across a building on the property.

EPA will then begin designing the cleanup of the site, which generally takes about 12 - 18 months. Actual cleanup work can take several years depending on the plan selected. If at any time during this process EPA determines the site poses an immediate health threat to people or the environment, the Agency will take immediate action to eliminate the hazard.

Note: Throughout this process, redevelopment of the site can progress, but all work will have to be approved by EPA and must not impede EPA's investigation and cleanup.

Do you want to help form a Community Advisory Group or be put on the site mailing list? A CAG is made up of representatives of diverse community interests. Its purpose is to provide a public forum for community members to present and discuss their needs and concerns related to the Superfund decision-making process. A CAG can assist EPA in making better decisions on how to clean up a site. It offers EPA a unique opportunity to hear and consider community preferences for site cleanup. Further information about CAGs can be found at www.epa.gov/superfund/community-advisory-groups.

If you are interested in helping to form this group for the McLouth Steel Superfund site and/or be put on the mailing/email distribution list, please email or mail your contact information to Kirstin Safakas at safakas.kirstin@epa.gov or at Kirstin Safakas, Community Involvement Coordinator, U.S. EPA Region 5, 77 W. Jackson Blvd. SI-6J, Chicago, IL 60604-3590. Please indicate what list you want to be included on and if you are interested in helping form the CAG, expected to begin convening in fall of 2019.



Site map.

Background

The former McLouth Steel facility originally consisted of 273 acres and operated from around 1950 until 1995, when McLouth filed for bankruptcy. In 1996, the McLouth bankruptcy estate sold the entire 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 Riverview-Trenton Railroad Company (referred to as 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 197acre southern portion through tax foreclosure. Wayne County then entered into a Purchase and Development Agreement with Crown Enterprises Inc., which transferred ownership to MSC Land Company. The remaining 14 acres are still owned by DSC. In addition, DTE Electric Co. has an easement of about 1.5 acres on Jefferson Avenue.

Technical Assistance Grants Will be Available

EPA's Technical Assistance Grant (TAG) program provides funding to community groups so they can pay for technical advisors to interpret and explain reports, site conditions, and EPA's proposed cleanup plans and decisions. There can be only one TAG for each Superfund site.

EPA's cleanup decisions depend on several factors including: what studies say about site conditions, the kinds of waste found and the cleanup methods that would work at a particular site. A technical advisor can help community members participate in decision-making by helping them to better understand what is going on at the site.

Your group may apply for a TAG if your members' health, economic well-being, or enjoyment of the environment is, or may be, hurt by a Superfund site. Your group does not need to be incorporated to apply for a TAG; however, to receive a TAG, your group must incorporate for the purpose of participating in decision-making at the site. Groups that are already incorporated for other purposes may also be eligible under certain circumstances. Municipalities or other government agencies are not eligible to receive TAGs. However, government officials may belong to a community group requesting a TAG.

Initially, EPA will award a TAG for up to \$50,000, but additional funds may be available. To get a TAG, your group must contribute a matching share to the project which must equal at least 20-percent of the total project costs. This match usually is not difficult to provide as most groups make their match donating volunteer hours and other "inkind" services. TAGs cannot be used to duplicate field or laboratory work. They may only be used to understand or interpret existing documents and activities conducted at the site.

The McLouth Superfund site is in the early stages of the Superfund process. A TAG may be more useful later in the program after a site-specific Community Advisory Group is formed. However, the steps for obtaining a TAG are complex, and this early stage may be a good time to learn more about the program.

More information about TAGs can be found at www.epa.gov/superfund/technical-assistance-grant-tag-program.

Under the terms of the purchase agreement, MSC is currently doing some cleanup on the southern portion of the site. In exchange, MSC and Crown, parties not responsible for the contamination on the property (known as non-liable parties) received covenants not to sue. This agreement will foster redevelopment by allowing MSC and Crown to manage environmental requirements while EPA investigates and cleans up the property.

To secure the covenants not to sue, the settlement requires MSC to do the following work in the southern portion of the site (*see site map on Page 3*):

- Demolish about 45 structures.
- Remove asbestos-containing material, containerized wastes and materials containing PCBs from all structures prior to demolition.
- Install a fence around the property.
- Remove contaminated water and sludge from 23 subsurface structures, clean or remove the structures and, if the structures remain, fill them with clean fill material.
- Investigate five areas where PCBs may have been released.
- Assess and report on options for stormwater management to eliminate uncontrolled flow to the Trenton Channel of the Detroit River.

The above work is being overseen by EPA's Emergency Response Branch of Superfund (*see box at right*).

To address environmental issues not covered by the proposed settlement, the southern portion of the site was listed on the Superfund National Priorities List. The cleanup will be overseen by EPA's Remedial Branch of Superfund.

Branches of Superfund

EPA's Emergency Response Branch handles shortterm cleanup of sites that pose an immediate threat to people or the environment. EPA's Remedial Branch handles investigations and cleanup of sites that pose potential long-term threats to people or the environment.



Teardown work at the site in April 2019.



Region 5 Community Involvement and 77 W. Jackson Blvd. 77 W. Jackson Blvd.

> United States Environmental Protection Agency

