

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

952069



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #9
MCLOUTH STEEL
A557_01
Trenton, MI
Latitude: 42.1699480 Longitude: -83.1696370

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From: Brian Kelly, OSC
Date: 12/9/2019

Reporting Period:

1. Introduction

1.1 Background

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

Incident Category

Privately Funded CERCLA Cleanup

Site Description and Location

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

In 2017, Wayne County acquired 183 acres of the 197-acre southern portion through tax foreclosure. Wayne County then entered into a Purchase and Development Agreement with Crown. Crown transferred title to MSC Land Company, LLC. The remaining 14 approximate acres are owned by DSC.

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

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

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

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

Preliminary Removal Assessment/Removal Site Inspection Results

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

More information about the McLouth cleanup can be found at www.epa.gov/superfund/mclouth-steel

2. Current Activities

2.1 Operations Section

Narrative

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

Site work started in December 2018 and is ongoing. Settlement work is expected to be completed next year.

NPL work is expected to continue through 2033.

Community

A community advisory meeting was held on November 14. The next meeting will be scheduled for early 2020.

Surface Water Control

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

Disposal and/or Reuse

Type of Waste	Monthly Total	Cumulative
Friable ACM:	0 Yards (0 Truck Load)	2,420 Yards (66 Truck Loads)
Galbestos Siding:	21.17 Tons	2,984.93 Tons
Const. & Demo Debris:	31.31 Tons	11,926.19 Tons
PCB Transformers:	0 Tons (0 Transformers)	315.2 Tons (49 Transformers)
Liquid Waste:	98,522 Gallons	2,705,791 Gallons
Freon/Refrigerant Units:	0 units drained, recycled	70 units drained, recycled
K061 Liquid Waste	30,980 gallons	30,980 gallons
K061 Hazardous Waste:	0 Vac/Roll-off Boxes	8 Vac/roll-off Boxes
K062 Liquid Waste:	0 Gallons	101,539 Gallons
K062 Solid Waste:	20 Cubic Yards	50 Cubic Yards

Work Progress Update

- Area 1 – House Keeping and Clean-up
- Area 4 – General Housekeeping and Clean-up
- Area 4A – AOC60(a) (South Motor Room) – Loading out of TSCA waste and ship off-site for disposal – 100%
- Area 4A – AOC60(b) (South Motor Room Basement) - SMRB liquids off site for disposal and re-load frac tanks with liquids
- Area 4A – Breaking of concrete and Cleanup
- Area 4A – No. 1 Finishing and Shipping Bay demolition
- Area 4C – Non-PCB Capacitor draining in preparation for off-site disposal
- Area 4C – Draining mineral oil from Pennsylvania Transformer
- Area 13 – Set-up, preparation, and tipping of Stove #1 – 100%
- Area 13 – Stove #1 asbestos load out of ACM contaminated brick – 100%
- Area 13 – Stove #2-5 prep for fish mouth cutting and pull plate attachment
- Area 14 – Turbine abatement and final clearance 100%
- Area 14 – WMU 15 (Waste Water Treatment Plant) – Removal of liquids for on-site dust control -
- Area 17 – WMU 23 (Former BOF)– Removal of liquids for off-site disposal, isolate piping, and cleaning – 100%
- Area 17 – WMU 23 Backfill trenches – 100%

- Area 18 – Pump Building demolition and pit backfilling – 100%
- Area 23 – WMU 1 Skimming of oil for off-site disposal
- Area 25 – AOC60(c) (Continuous Caster Substation) - Removal of liquids from basement for dust control – 100%
- Equipment maintenance

ANALYTICAL DATA RECEIVED

- Air Monitoring –
 - o Perimeter dust monitoring was performed on October 4th, 10th, 17th , 23rd , and 30th - no exceedances
 - On October 10 the data sets for monitor 3 and monitor 4 were not downloaded and saved correctly.
- o Real-Time Dust Monitoring was conducted October 1st – October 31st , 2019 (Mon. – Fri.)
 - On October 2 the Site experienced an exceedance of TPM and PM-10 sized particulate in work area 4A. During this exceedance, dust suppressant in the form of water was being administered by three water trucks and a dust boss. Readings taken directly after the exceedance were below the TPM and PM-10 action levels.
- o Manganese (Mn) Sampling occurred on October 4th, 17th , 23rd , and 30th , 2019 - no exceedances

Waste Characterization Analyses

- o B-76(Pit and Tunnel Southeast of Stoves)
- o WMU-23A Floor (Former BOF Gas Cleaning Sludge Pit)
- o WMU-25N (K061 Settling Basin)
- o WMU-25S (K061 Settling Basin)
- o AOC 60B (South Motor Room Basement)

Other Activities

None

2.2 Planning Section

Planned Work

- Area 4A – Prepping steel for scrap
- Area 4A – SMRB – Begin beta test of liquid treatment plan
- Area 4C Penthouse – Demolition of cinder block wall around transformer
- Area 4C Penthouse – Removal of high voltage insulators
- Area 4C Penthouse – Removal of transformer from Penthouse and prep to be taken off-site
- Area 5 – Lab Basement – Backfill and roll
- Area 14 – Blue Clarifier –removal of remaining liquids, begin cleaning tank interior
- Area 17 – WMU 23 backfilling trenches and pits
- Area 18 – Demolition of pump house building, and breaking down knee wall
- Area 18 – WMU 25 - Breaking of knee wall around pit
- Area 22 - WMU 6 – Final cleaning and preparation for demolition and backfill
- Area 25 – A8 Concast tunnels - removal of liquids for off-site disposal
- Equipment maintenance
- General Housekeeping
- Wheel wash disassembled and stored for winter

Issues

On November 6, 2019, visible emissions were documented by EGLE staff which resulted in a notice of violation (NOV) being issued on November 25. The NOV states, "Visible emissions were observed during the demolition of stove which was demolished as asbestos containing." MSC and its contractors must respond by December 16. No further work will be conducted on the stoves until the violation is resolved.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

ACM - Asbestos Containing Material
 ATSDR -Agency for Toxic Substances and Disease Registry
 CACO - State of Michigan Corrective Action Consent Order
 CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act, known also as Superfund
 CIP - Community Involvement Plan
 EGLE - Environment, Great Lakes & Energy - State of Michigan
 K061 - Listed Waste: emission control dust
 K062 - Listed Waste: spent pickle liquor
 mg/m3 - Milligram per cubic meter
 MRL - Minimum Risk Level
 NAAQS - National Ambient Air Quality Standards
 NPL - National Priorities List
 PCBs - Polychlorinated biphenyls (a group of manmade chemicals)
 PM2.5 - Particulate matter 2.5 micrometers or less in diameter
 PM10 - Particulate matter 10 micrometers or less in diameter
 POLREP - Pollution Report
 SitRep - Situation Report

TPM - Total Particulate Matter
ug/m3 - Micrograms per cubic meter
WMU - Waste Management Unit

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.