



Frequently Asked Questions McLouth Steel Cleanup

The U.S. Environmental Protection Agency and the Michigan Department of Environment, Great Lakes, and Energy 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 February 2022.

Cleanup

1. Who currently owns the former McLouth Steel property?

In 2017, Wayne County, Michigan acquired 183 acres of the 197-acre southern portion through tax foreclosure. Wayne County then entered into a Purchase and Development Agreement with Crown Enterprises Inc., or Crown, who then formed MSC Land Co. LLC, or MSC, as part of the purchase. Neither EPA nor the Michigan Department of Environment, Great Lakes, and Energy, or EGLE, were party to the Purchase and Development Agreement, available at <https://semspub.epa.gov/work/05/939119.pdf>.

The remaining 14 acres not described above are owned by DSC. In addition, DTE Electric Co. has an easement of about 1.5 acres on Jefferson Avenue.

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

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

3. Who is involved in cleaning the property (both northern and southern portions)?

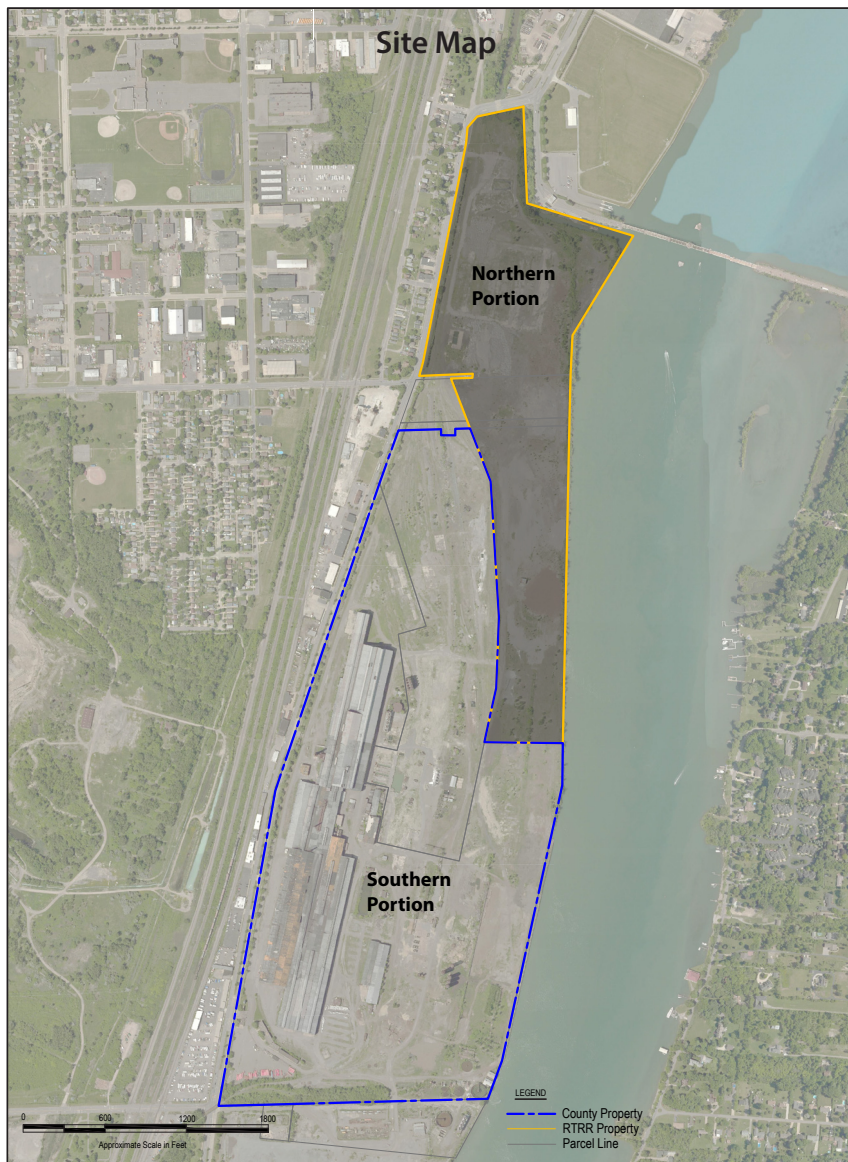
Under the terms of a 2018 Settlement Agreement with MSC, EPA, EGLE and the U.S. Department of Justice, MSC performed specified environmental cleanup work on the site. In exchange, Crown and MSC, parties not responsible for the contamination on the property (known as “non-labile parties”) clarified their environmental responsibilities and received covenants not to sue by the government.

The Riverview-Trenton Railroad Co., or RTRR, cleans areas in the northern portion. The southern portion will continue be cleaned up through a mix of private and public funds. Some work has already been completed (see question 4); additional work will occur over the next few years. EPA and EGLE will ensure the cleanups are done properly and redevelopment is done safely.

4. What cleanup has been completed through 2021?

The environmental remediation conducted by MSC included the:

- Removal of asbestos, waste and polychlorinated biphenyls, or PCBs, prior to demolition.
- Installation/maintenance of a fence around the property.



- Demolition of approximately 45 structures.
- Removal of contaminated water and sludges from 23 pits, basements and lagoons.
- Investigation of five areas for PCBs.
- Assessment on options for stormwater management.

MSC conducted additional environmental cleanup not required by the Settlement Agreement, including the demolition of four large stoves on the property. The cleanup included more than 100,000 labor hours and cost more than \$31 million. Total waste, in volume, removed from the property includes over 32,000 tons of solids and nearly three-million gallons of liquid.



5. Who is paying for the cleanup?

The environmental cleanup work completed through 2021 was conducted and paid for by MSC. Further cleanups conducted by EPA under the Superfund program will be funded using federal dollars. Cleanup for redevelopment purposes will be the responsibility of the property owner.

EPA will also work with the Michigan Department of Health and Human Services, or MDHHS, on a Public Health Assessment Plan. A presentation on this Plan is available at https://www.michigan.gov/documents/mdhhs/McLouth_Steels_4-8-21_presentation_slides_727736_7.pdf.

6. 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. EPA will work to prevent these contaminants from getting into the environment through soil, air and water. As the cleanup moves forward, more information will be gathered to understand locations of contamination better and stop any possible movement from the area.

9. 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.

7. How will you make sure contamination does not spread during cleanup work?

Through a thorough site investigation, EPA will research current site conditions and investigate any current or future pathways that contamination could migrate or move off site. As part of the cleanup work, EPA will develop plans to manage its activities to ensure that contamination does not spread.

10. What will happen to the contaminated material and soil taken from the property? What has happened to the contaminated material taken so far?

All waste removed during building demolition in 2019-2021 was taken to approved licensed disposal facilities in Michigan, Ohio and Alabama. For a detailed breakdown of what materials went to each location, see MSC Land Company's Final Report found at this link: <https://semspub.epa.gov/src/document/05/971639>.

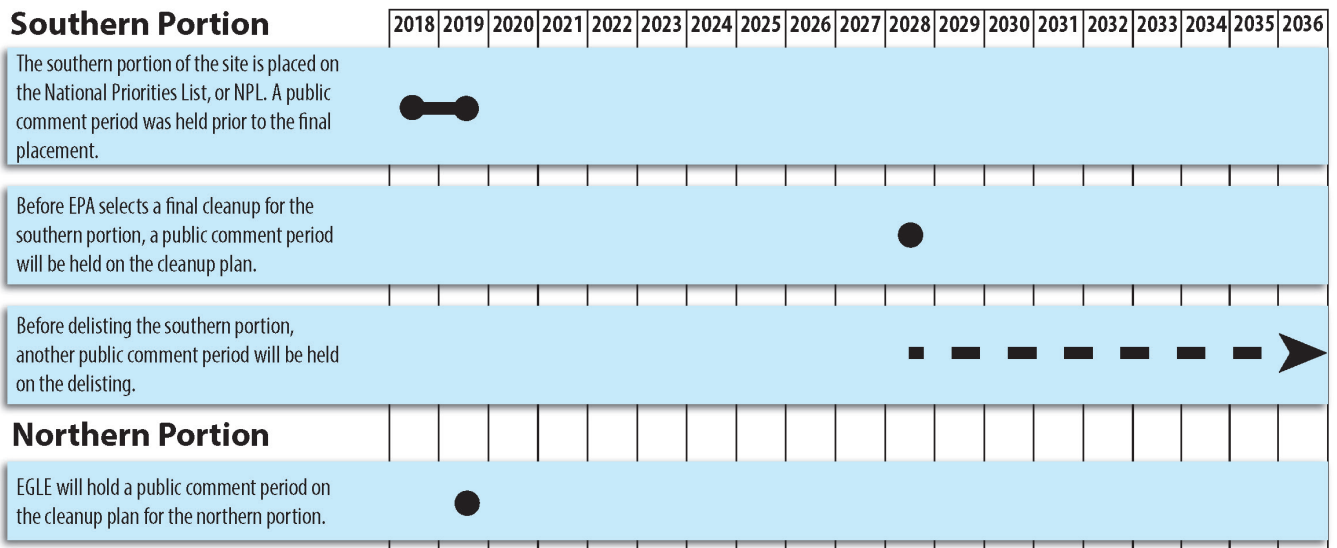
Other non-hazardous materials from the site were recycled or reused, including over 32,000 tons of steel, 72,500 tons of crushed concrete, slag, and construction brick, along with 70 refrigerant units, and six non-PCB transformers.

8. What is being done to evaluate health concerns in the surrounding communities?

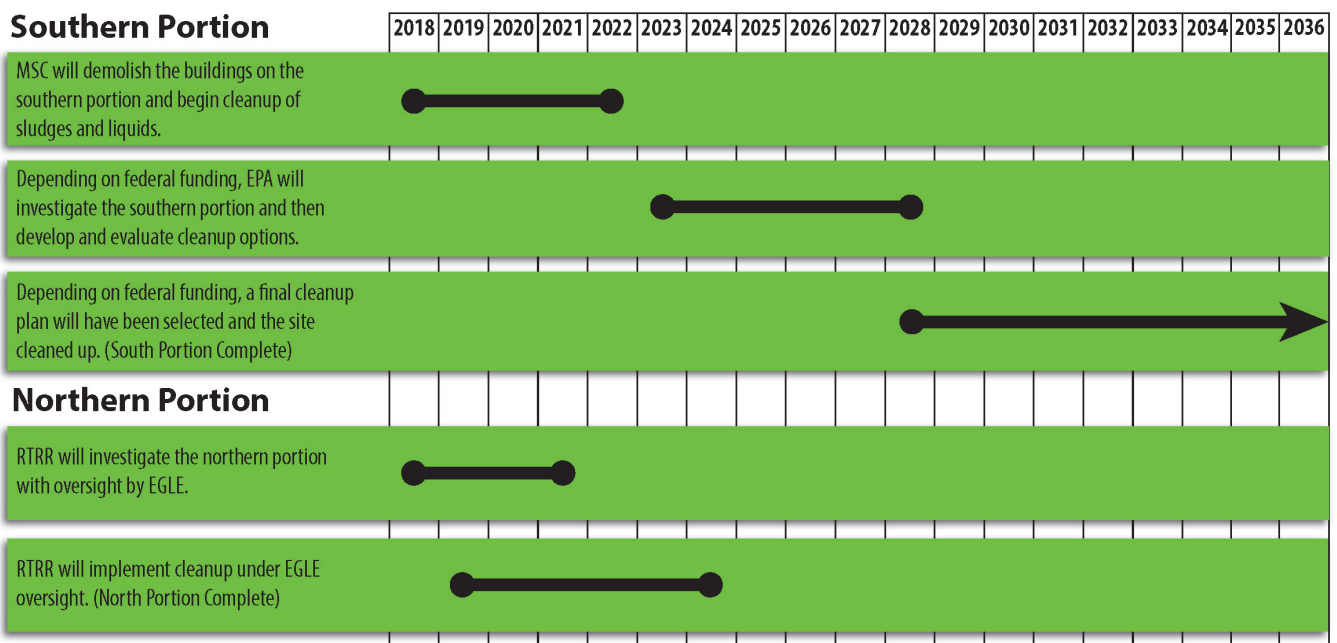
As EPA conducts its investigation of the site, staff will work with public health experts to define ways in which people may potentially be exposed to environmental hazards on-site and findings shared in a document called a Risk Assessment Report.

Any remaining waste removed from the site will go to a licensed disposal facility.

Community Engagement Opportunities



Investigation and Cleanup Activities



11. Were there any violations or accidents during MSC's demolition work?

EGLE issued MSC Land Co., LLC two notices of violation during building demolition on the property. The first was issued January 2019 due to improper handling of asbestos-containing materials. The second was issued November 2019 due to visible emissions during the demolition of one of the asbestos-containing stoves. More details on these notices of violations can be found on EGLE's McLouth Steel webpage, available at https://www.michigan.gov/egle/0,9429,7-135-3312_72907_72912-476147--,00.html.

There were no other violations or recordable incidences, including accidents, to report.

Timing

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

EPA expects to begin the investigation of the site, referred to as the Remedial Investigation, in spring 2023. This investigation will include soil, groundwater, surface water and sediment samples to determine what type, how much, and where contamination is located. EPA will also better understand the ways in which people could be exposed to contamination from the site. The investigation is expected to take up to two years, after which 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.

Based on the findings of the Remedial Investigation Report, options to clean up or resolve pollution problems will be presented in a report called a Feasibility Study. EPA will then recommend the cleanup steps Agency experts believe are the most effective to resolve contamination issues at the site. These cleanup steps will be laid out in a document called a Proposed Plan, which is expected in 2028.

Design of the cleanup will follow and expected to take up to two years to finalize. Once work begins after the design is finalized, cleanup actions could take several years depending on the final plan (see timeline on page 3).

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

Phase I work, which included establishing site conditions and minor cleanup of some former Waste Management Units, was completed in 2021. EGLE is in the process of drafting an enforcement referral for a Phase II Corrective Action Consent Order, or CACO, to continue remediation.

14. When will all the work be completed?

EPA Superfund cleanup will take several years. Work on the northern portion is expected to take a few more years as the facility and EGLE work through establishing obligations under a Phase II CACO. Please see the timeline on page 3 for an estimate on the timing of work.

15. Is the McLouth site part of the Monguagon Creek—Upper Trenton Channel Remediation project with EPA's Great Lakes National Program Office, or GLNPO?

EPA's GLNPO and a non-federal sponsor Bridgestone Americas Tire Operations, LLC, are developing a remedial design plan to address contaminated sediments in the lower 1,700 feet of Monguagon Creek as well as approximately 50 acres of the Trenton Channel. The cleanup design is expected to be completed in 2023 with remediation to follow, expected in 2024.

The McLouth site is separate from GLNPO's project, and sediments on the McLouth Superfund Site and extending south will be addressed as part of the Superfund cleanup.

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?

As investigation and cleanup moves forward on the site, EPA will continue to engage the community throughout the process. This engagement will consist of, at a minimum:

- Continuing meetings with the McLouth CAG.
- Hosting public meetings to review results and proposed cleanup plans.

- Developing and sharing fact sheets with the community.
- Issuing press releases announcing important cleanup milestones.
- Emailing the McLouth listserv to share site and webpage updates.
- Placing newspaper advertisements to announce comment periods and site milestones.
- Utilizing EPA Region 5's Facebook and Twitter pages.
- Opening a formal public comment period to listen to resident comments and concerns.
- Responding to all comments sent to the Agency within the public comment period.

For more details, review EPA's McLouth Steel Community Involvement Plan, available at <https://semspub.epa.gov/work/05/949432.pdf>.

17. Can the public review technical and legal documents about McLouth Steel? Where are they located?

All documentation pertaining to EPA's role in the McLouth Steel Superfund site is available under webpage sections titled "Reports and Documents" and "Administrative Records", available at www.epa.gov/superfund/mclouth-steel. Additionally, electronic versions of all referenced documents can be accessed at the site's Information Repository, which is currently located at the Trenton Veterans Memorial Library. Please ask a librarian for access.

If you are looking for a specific document, you may also contact the site's Community Involvement Coordinators or the site's technical staff—see contact information on page 6.

18. What is the role of a Community Advisory Group, or CAG?

A CAG is a self-supported group of affected parties surrounding an EPA Superfund site. CAGs are generally formed at Superfund sites with complex, long-term remedies, designed to serve as the focal point for the exchange of information among the local community and EPA, the state regulatory agency, and other pertinent federal agencies involved in the site's cleanup. Its purpose is to provide a public forum for community members to present and discuss their concerns related to the Superfund process.

A CAG for the McLouth Steel Superfund site began forming in late 2019. In partnership with residents and businessowners, congressional offices and a professional, neutral facilitator, the Agency holds regular meetings with the McLouth CAG. An agenda for each meeting is sent out in advance of these calls and a formal meeting summary is provided afterwards.

These summaries are available to the public and can be reviewed on EPA's McLouth Steel webpage at www.epa.gov/superfund/mclouth-steel. All CAG meetings are open to the public with advance registration.

19. Can the CAG apply for an EPA Technical Assistance Grant, or TAG?

Any group, including CAG's, may apply for a TAG if its members' health, economic wellbeing, or enjoyment of the environment is, or may be, affected by a Superfund site. Municipalities or other government agencies are not eligible to receive TAGs, however, government officials may belong to a community group requesting a TAG. The group must be incorporated through the state as a registered nonprofit.

Only one site TAG can be awarded at a time. Initially, EPA will award up to \$50,000, but additional funds may be available throughout the project lifecycle. To get a TAG, a group must contribute a matching share to the project which must equal at least 20-percent of the total project cost. This match usually is not difficult to provide as most groups make their match donating volunteer hours and other "in-kind" services. TAGs cannot be used to duplicate field or laboratory work; they may only be used to review or interpret existing documents and activities conducted at the site.

More information about TAGs can be found at <https://www.epa.gov/superfund/technical-assistance-grant-tag-program>. You may also contact the site's Community Involvement Coordinators—see contact information on page 6.

20. Can the CAG meet without EPA or the facilitator being present?

Yes, the CAG is welcome to convene meetings outside of those attended by EPA or the facilitator. This may be helpful to discuss items about the site that EPA is not involved with or to discuss other topics entirely that the community may be interested in.

Restoration and Future Use

21. 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, as defined by EPA and EGLE regulations, the agencies do not have a role in deciding redevelopment.

22. Will there be restrictions on types of activities or materials on the property in the future?

The property owner may begin developing the property, subject to local zoning and planning regulations. The 2018 Settlement Agreement does include provisions on how redevelopment will occur and requirements for sampling and handling waste and cannot negatively impact EPA's cleanup work. For more information about these provisions, see pages 18-21 of EPA's Settlement Agreement, found at <https://semspub.epa.gov/work/05/941447.pdf>.

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

Habitat restoration is not covered by the Settlement Agreement. However, EPA notified the federal Natural Resources Trustees, a group of agencies that focus on restoration projects, to the work happening at the site. As stated previously, EPA is not involved in the future development of the property.



For more information

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

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