

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #13
MCLOUTH STEEL
A557_01
Trenton, MI
Latitude: 42.1699480 Longitude: -83.1696370

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USCG PolRep Distribution, USCG

From: Brian Kelly, OSC

Date: 4/6/2020

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 in 2020.

NPL work is expected to continue through 2033.

Community Involvement

The Community Advisory Group (CAG) met on March 12, 2020. The next meeting is scheduled for April 9, 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)	2,450 Yards (67 Truck Loads)
Galbestos Siding:	194.19 Tons	3,519.0 Tons
Const. & Demo Debris:	1,757.7 Tons	17,062.25 Tons
PCB Transformers:	0 Tons (0 Transformers)	466.8 Tons (85 Transformers)
Liquid Waste:	0 Gallons	2,790,881 Gallons
Freon/Refrigerant Units:	Waste Removal Complete	70 units drained, recycled
K061 Liquid Waste	Waste Removal Complete	32,956 gallons
K061 Hazardous Waste:	Waste Removal Complete	8 Vac/roll-off Boxes
K062 Liquid Waste:	Waste Removal Complete	101,539 Gallons
K062 Solid Waste:	Waste Removal Complete	50 Cubic Yards
Non-Haz Solids	171.67 Yards	851.67 Yards

Work Progress Update

- Area 3 – Demolition and debris cleanup of air handling system – 100%
- Area 4A – B24 (Finish Stand Pit #2) – Torch cutting of equipment _ 100%
- Area 4A – Torch cutting large beams for salvage, and shearing steel for salvage
- Area 4A – WMU 51(Six Stand Sumps) - Torch cutting of equipment – 100%
- Area 4B – Asbestos investigation of smokestacks – 100%
- Area 4B – Investigation of tranzite building on roof – 100%
- Area 4C – Galbestos Removal and demolition of building 4 – 90%
- Area 4C – Shearing of steel for salvage, load out of scrap for salvage
- Area 7 – B82 – Skimming of Oil, and other miscellaneous pits
- Equipment Maintenance

ANALYTICAL DATA RECEIVED

- February Air Monitoring
 - o Asbestos - no exceedance of MIOSHA limits. Exceedance of the Michigan Clearance criteria – being used as a voluntary action Level
 - o Perimeter Dust Monitoring - no exceedance
 - o Perimeter Manganese Sampling - no exceedance
 - o Real-time Dust Monitoring - no exceedance

Waste Characterization Analyses

N/A

Other Activities

None

2.2 Planning Section

Planned Work

- Area 4A – Cleaning of Frac Tanks
- Area 4A – AOC 60B (South Motor Room Basement) Water removal and treatment
- Area 4A – AOC 60B (South Motor Room Basement) Asbestos survey
- Area 4B – Removal of transite building on roof in NE corner
- Area 4B – Galbestos removal and demolition
- Area 4C – Torch cutting large beams for salvage
- Area 4C – Penthouse – sample subfloor concrete for potential use as inert fill material
- Equipment Maintenance
- Concrete sampling of piles for potential use as inert fill material
- Load out of scrap steel for salvage
- Site wide cleanup of areas previously completed or near completion

Issues

The air monitoring results detailed above represent the month of February. During March, EPA requested changes to the dust monitoring work plan following dust generated during the demolition of the mill buildings.

COVID-19

The potential effects of COVID-19 are being evaluated, and adjustments are being made to the health and safety plan. Currently, work is limited at the site.

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

EGL - 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)

PM_{2.5} - 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.