



COVER LETTER
MONTHLY AIR AND ASBESTOS REPORTS – February 2020
DISPOSAL/REUSE SUMMARY REPORT THRU March 2020

TO: Brian Kelly, U.S. EPA; Dave Kline, EGLE DATE: April 1, 2020

FROM: Tim Francis, Project Manager, ASTI Environmental

C.C.: Steven Kaiser, U.S. EPA, Rich Conforti, EGLE, Dennis Schreibeis, MSC Land Company, LLC, Todd Goss, MSC Land Company, LLC, Tom Wackerman, ASTI Environmental

RE: Air Monitoring, Sampling, and Asbestos Monitoring

Attached are the following:

1. Air Monitoring and Manganese Sampling Report
2. Asbestos Air Monitoring Report
3. Disposal/Reuse Summary Report thru March 2020

Please let me know if you have any questions related to this report.

Thank you,

Tim Francis
Project Manager
(810) 360-9852

February Asbestos Air Monitoring Report

LOCATION: Former McLouth Steel Facility – County Property
 DATE: April 1, 2020
 Monitoring Duration: January 29, 2020 – February 29, 2020

Summary of ETC Air Monitoring (February 2020)

	Highest Excursion Level (Reg. Level 1.0 f/cc) (Sample Codes: EX_)	Highest 8 Hour Time Weighted Average (Reg. Level 0.10 f/cc) (Sample Codes: EX_, PS_)	Highest Area Sample Level (Voluntary Action Level 0.05 f/cc) (Sample Codes: CS_)	Highest Post Abatement Sample Level (Reg. Level 0.05 f/cc) (Sample Codes: PA_)
Date(s)	All Levels above regulatory limit are in red			
1/29/2020	<0.071	0.014	0.006	NA
1/30/2020	0.128	0.028	0.073	NA
2/3/2020	0.156	0.036	0.003	NA
2/4/2020	<0.074	0.015	0.005	NA
2/5/2020	<0.071	0.039	0.012	NA
2/6/2020	0.114	0.052	0.011	NA
2/7/2020	<0.071	0.020	0.010	NA
2/10/2020	<0.071	0.030	0.006	NA
2/11/2020	0.107	0.038	0.012	NA
2/12/2020	0.078	0.019	0.012	NA
2/13/2020	0.078	0.026	0.005	NA
2/14/2020	NA	NA	NA	0.013
2/17/2020	0.085	0.010	0.006	NA
2/18/2020	NA	NA	0.005	NA
2/20/2020	0.107	0.015	0.011	NA
2/21/2020	0.100	0.026	0.013	NA
2/24/2020	NA	0.005	NA	NA
2/25/2020	NA	0.002	NA	NA
Total Number of Samples Taken	14	30	27	2

Conclusion

Through all the monitoring conducted between January 29, 2020 and February 25, 2020, the highest recorded area reading was 0.073 f/cc (Michigan Clearance criteria is 0.05 f/cc – being used as a Voluntary Action Level). Please note that this reading exceeds the voluntary limit of 0.050 f/cc but is still below the applicable OSHA regulatory limit of 0.10 f/cc. The highest excursion sample was 0.156 f/cc (MIOSHA Excursion Limit 1.0 f/cc) the highest personal 8-hour TWA reading was 0.052 f/cc (MIOSHA 8-hour TWA level is 0.10 f/cc). Therefore, these results would indicate that the removal operations are not causing elevated levels of fibers to be produced and put into the air above the MIOSHA levels.

Thank you,

ASTI ENVIRONMENTAL*Timothy A. Francis*

Tim Francis
Project Manager
810.360.9852

February Perimeter Air Monitoring and Manganese Sampling

LOCATION: Former McLouth Steel Facility – County Property

DATE: April 1, 2020

Monitoring Duration: February 1, 2020 – February 29, 2020

Perimeter Monitoring (Refer to Attachment A for additional details)

- The site experienced no exceedances of PM-2.5 particulate concentrations above the NAAQS standard of 0.035 mg/m³ for Air Quality, or a downwind station exceeding particulate concentrations of the average of all upwind stations by over 15% over a 24-hour period during the one work day per work week monitoring conducted on Feb. 4, 14, 19, and 25, 2020.
- During the one-week continuous monitoring event (February 3rd-8th, 2020), several monitors shut down early due to their inability to maintain a charge, even with external batteries.
 - During February 3rd-4th all stations captured 24 hours of monitoring data
 - During February 4th -5th station 1 shut down early
 - Station 1- total run time 7Hrs, 37Mins, total down time 16Hrs, 23Mins, down time during work hours 1Hr, 49Mins (between the hours of 7:30AM to 9:20AM on the 5th)
 - The station did not exceed the established standard while operational.
 - During February 5th-6th stations 3 and 4 shut down early
 - Station 3- total run time 15Hrs, 2Mins, total down time 8Hrs, 58Mins, down time during work hours 4Hrs, 54Mins (between the hours of 11:30AM to 12:00PM and 12:06PM to 4:00PM on the 5th and 7:30AM to 8:00AM on the 6th)
 - Station 4- total run time was 14Hrs, 35Mins, total down time 9Hrs, 35Mins, down time during work hours 3Hrs, 31Mins (between the hours of 7:30AM to 11:00AM on the 6th)
 - The stations did not exceed the established standard while operational
 - During February 6th -7th stations 2 and 4 shut down early
 - Station 2- total run time 14Hrs 5 Mins, total down time 9Hrs, 55Mins, down time during work hours 31Mins (between the hours of 7:30AM to 8:01AM on the 7th)
 - Station 4- total run time 16Hrs 6Mins, total down time 7Hrs, 54Mins, down time during work hours 23Mins (between the hours of 7:30AM to 7:53AM on the 7th)
 - The stations did not exceed the established standard while operational
 - During February 7th-8th station 1 shut down early

- Station 1- total run time 15Hrs, 54Mins, total down time 8Hrs, 6Mins, down time of 4Hrs, 23Mins (between the hours of 7:30AM to 11:44AM on Saturday the 8th, a non-workday)
 - The stations did not exceed the established standard while operational

Perimeter Sampling

- The site had no exceedances of the ATSDR MRL standard for PM10 Manganese during the sampling which occurred on Feb. 4, 14, 19, and 25, 2020. The ATSDR MRL standard is 0.03 ug/m³ over 24 hours.

Real-time Dust Monitoring

- The site experienced no exceedances for TPM or PM-10 sized particulate in any work area during the month of February 2020.

Conclusion

- **Perimeter Monitoring/Sampling:** During the month of February 2020 the concentrations of PM-2.5 particulate matter were not in exceedance of the NAAQS of 0.035 mg/m³ for Air Quality, or the concentration was 15% or less when comparing the average of all upwind stations to the downwind station per the Dust Control Work Plan..
- **Real-time Monitoring:** The site experienced no exceedances for TPM or PM-10 sized particulate in any work area during the month of February 2020.

Attachment A

February Perimeter Air Monitoring, Manganese Sampling, and Weather Charts and Data

LOCATION: Former McLouth Steel Facility – County Property

DATE: April 1, 2020

Perimeter Air Monitoring Charts and Data

Former McLouth Steel County Property Site Preparation Project Perimeter PM 2.5 Air Monitoring Results – 24 hour average (mg/m ³)							
Date	Station 1	Station 2	Station 3	Station 4	24-hr Avg. All Stations		
	24-hr Avg.	24-hr Avg.	24-hr Avg.	24-hr Avg.	Downwind station max value	Upwind station average value	Diff.
2/3/19	0.031	0.018	0.026	0.017	0.031	0.017	NA
2/4/19	0.013	0.006	0.009	0.011	0.013	0.009	NA
2/5/19	0.016	0.010	0.013	0.009	0.016	0.009	NA
2/6/19	0.008	0.009	0.007	0.011	0.008	0.010	NA
2/7/19	0.011	0.016	0.019	0.021	0.021	0.014	NA
2/14/19	0.029	0.023	0.034	0.020	0.034	0.026	NA
2/19/19	0.013	0.003	0.020	0.002	0.020	0.008	NA
2/25/19	0.019	0.010	0.025	0.022	0.025	0.018	NA

	Downwind Location
	Exceeds particulate concentrations of an upwind station by over 15% of the NAAQS standard
BOLD	Max Value for Daily Average for all Stations
N/A	No Data
	Data not valid

Manganese Sampling Chart

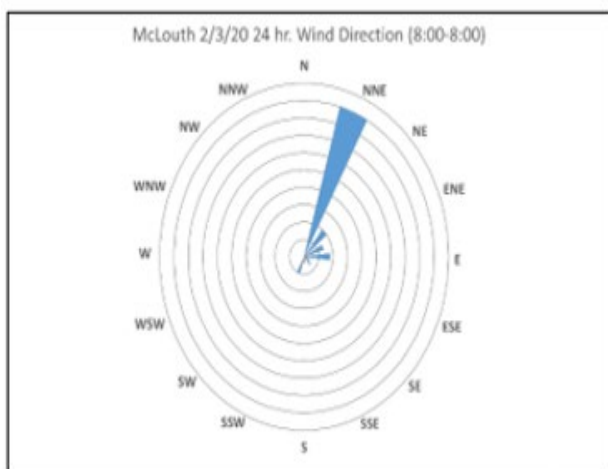
Former McLouth Steel Facility Air Sampling Analytical Results						
Analytical results for PM-10 Manganese(Mn) (results are in ug/m ³ average over 24 hrs)						
Start Date	Start time (approx)	Time Interval (hrs)	Site 1	Site 2	Site 3	Screening Level 0.3ug/m ³
2/4/2020	8:00	24	0.03	0.01	0.02	0.3
2/14/2020	8:00	24	0.02	ND	ND	0.3
2/19/2020	8:00	24	0.01	ND	ND	0.3
2/25/2020	8:00	24	ND	ND	ND	0.3

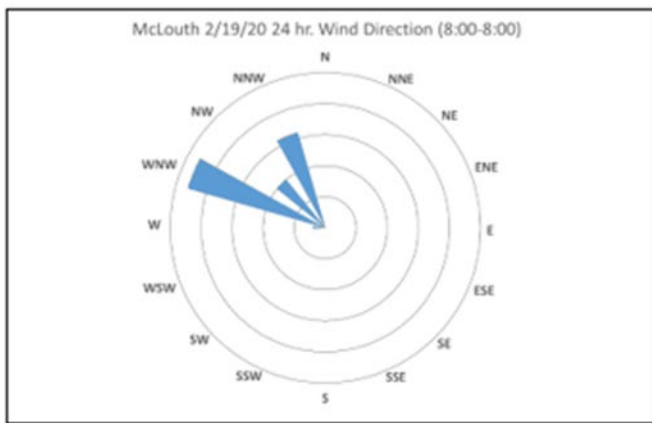
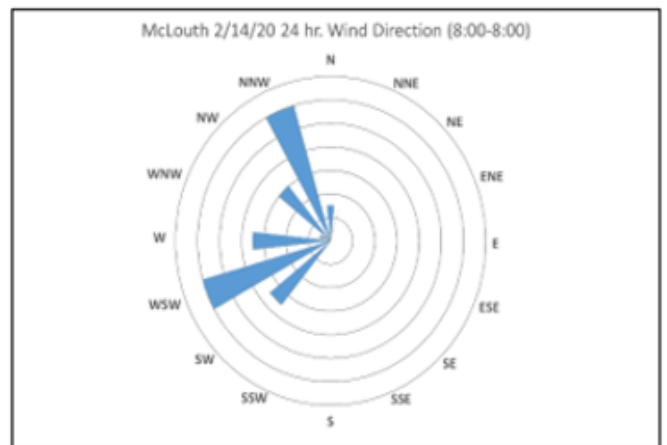
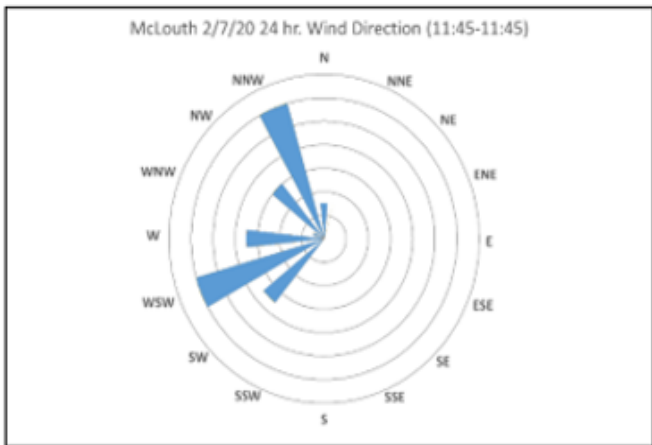
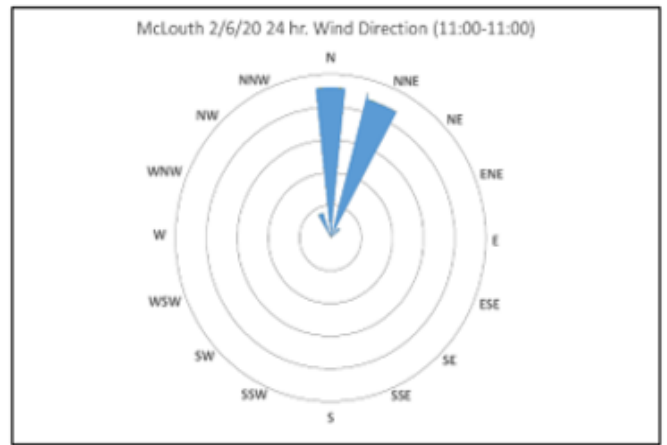
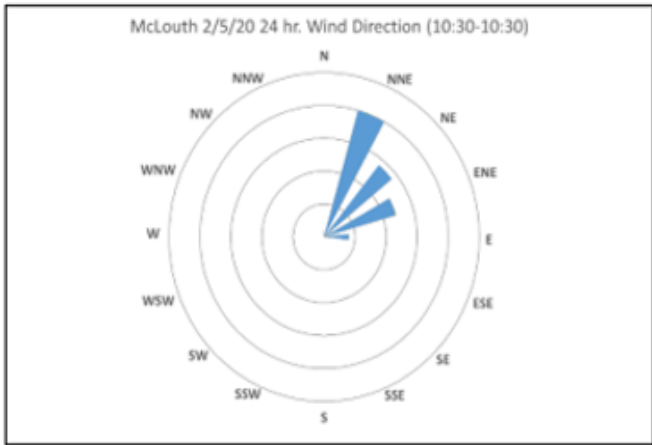
ND: Non Detect

Weather Data

Former McLouth Steel Facility-County Property				
Perimeter Monitoring and Sampling Wind Data				
Instrumentation: Davis Vantage Pro 2 Weather Station				
Weather Station Site: Southwest corner of property-approximately 100' due south of job trailer set up on top of light pole.				
		24 Hour		
Date:	Start time:	Avg. wind speed:	Predominate wind direction:	Notes:
2/3/2020	8:00	4	NNE	
2/4/2020	9:30	9	NNE	
2/5/2020	10:30	9	NNE	
2/6/2020	11:00	9	N	
2/7/2020	11:45	4	WSW	
2/14/2020	8:00	5	SW	
2/19/2020	8:00	8	WNW	
2/25/2020	7:30	10	NNE	

Wind Roses





Disposal/Reuse Summary Report – March 2020

TO: Brian Kelly, U.S. EPA; Dave Kline, EGLE **DATE:** April 1, 2020
FROM: Tim Francis, Project Manager, ASTI Environmental
C.C.: Steven Kaiser, U.S. EPA, Rich Conforti, EGLE, Dennis Schreibeis, MSC Land Company, LLC, Todd Goss, MSC Land Company, LLC, Tom Wackerman, ASTI Environmental, Mark Fletcher, Stephens Environmental
RE: **Cumulative Disposal and Reuse Summary Report
 Former McLouth Steel Facility – County Property Trenton, MI**

The following represents the amount of disposal and/or reuse of materials for the month of March and the cumulative totals for the project to date:

<u>Type:</u>	<u>March:</u>	<u>Cumulative:</u>
Friable ACM:	30 Yards (1 Truck Loads)	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
Non-Haz Solids	0 Yards	851.67 Yards

Please let me know if you have any questions related to this report.

Thank you,

Timothy A. Francis

Timothy A. Francis
 Project Manager
 (810) 360-9852