**Subject:** POLREP #11  
**MCLOUTH STEEL**  
**A557_01**  
**Trenton, MI**  
**Latitude: 42.1699480 Longitude: -83.1696370**

**To:**  
Jason El-Zein, U.S. EPA  
Sam Mankowski, U.S. EPA  
Ruth Mahfuz, EPA  
Nabil Fayoumi, U.S. EPA  
Steve Kaiser, U.S. EPA  
Eileen Deamer, U.S. EPA  
Diane Russell, U.S. EPA  
Carol Ropski, U.S. EPA  
Steve Ridenour, U.S. EPA  
John Maritote, U.S. EPA  
Region 5 EOC, U.S. EPA  
**HQ EOC, U.S. EPA**  
**Records Center, U.S. EPA**  
**Phillippe Cannon, U.S. EPA**  
**David Kline, EGLE**  
**Rich Conforti, EGLE**  
**Jacob Runge, EGLE**  
**Keith Krawczyk, EGLE**  
**Aaron Keatley, EGLE**  
**Jay Eickholt, EGLE**  
**Dana Bradt, EGLE**  
**Steve Rzeppa, Trenton Mayor**  
**Khalil Rahal, Wayne County**  
**Dennis Schreibis, MSC**  
**Tim Francis, ASTI Project Manager**  
**Andrew Swift, Riverview Mayor**  
**Doug Drysdale, Riverview City Manager**  
**Brian Loftus, Grosse Ile Township Supervisor**  
**Scott Church, Trenton City Manager**  
**Jim Wagner, City of Trenton**  
**Bryan McMurrin, Congresswoman Dingell's Office**  
**Kevin Ramboak, Staff Congresswoman Dingell**  
**Stephanie Chang, Michigan State Senator**  
**Cara Clemente, Michigan State Representative**  
**Darin Camilleri, Michigan State Representative**  
**Todd Goeks, NOAA**  
**Laurie Lee, NOAA**  
**Lindy Nelson, U.S. DOI**  
**Valencia Darby, U.S. DOI**  
**Wayne Babcock, U.S. DOI**  
**Robert Burr, U.S. DOI**  
**Annette Trowbridge, U.S. Fish & Wildlife**  
**USCG PolRep Distribution, USCG**

**From:** Brian Kelly, OSC  
**Date:** 2/3/2020

### Reporting Period:

#### 1. Introduction

<table>
<thead>
<tr>
<th>Incident Category</th>
<th>Contract Number:</th>
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<tbody>
<tr>
<td>Removal Action</td>
<td>6/5/2018</td>
</tr>
</tbody>
</table>

| Site Number: | A557_01 |
| D.O. Number: | CERCLA |
| Response Authority: | PRP |
| Response Lead: | NPL |
| NPL Status: | NPL |
| Mobilization Date: | 1/2/2019 |
| Demob Date: | |
| CERCLIS ID: | MID017422304 |
| ERNS No.: | |
| FPNI#: | Reimbursable Account #: |

#### 2.2 Planning Section

- On December 17, monitoring Station 4 shut down early due to a dead battery.
- On December 17, monitoring Station 3 did not start properly due to an inlet tube blockage.

#### Issues

- Equipment Maintenance
- Area 13 – Concrete breaking slag pit walls
- Area 4A – South Motor Room and Basement preparation and planning for cleaning, abatement, and demolition activities
- Area 4A – Scrap load out for salvage
- Area 4A – Demolition of South End of Mill Building

#### Planned Work

None

#### Other Activities

- Waste Characterization Analyses
  - Air monitoring was performed on December 4th, 11th, 17th, and 24th – no exceedance
  - Area 23 – WMU 1 (Sedimentation Basin) – Backfilling of Sedimentation Basin completed – 100%
  - Area 7 – WMU 43 (Concast Grit Basin) – Breaking concrete knee walls and backfilling – 100%
  - Area 4C – 14 transformers shipped off site for disposal

#### Settlement

- A second community advisory meeting was held on January 23, 2020. The next meeting is scheduled for February 13, 2020.
- NPL work is expected to continue through 2033.

#### More Information

- More information about the McLouth cleanup can be found at [www.epa.gov/superfund/mclouth-steel](http://www.epa.gov/superfund/mclouth-steel)
- Many of these identified conditions were located within the southern portion.
- On May 13, 2019, the southern portion was listed on the Superfund National Priorities List (NPL).
- Agreement requires MSC to do the following work in the southern portion of the site:
  - Investigate five areas where PCBs may have been released, and
  - Remove water and sludges from 23 subsurface structures,
  - Demolish about 45 structures,

#### Agreement (between MSC and EPA, EGLE, and the U.S. Department of Justice, MSC and Crown, parties not responsible for investigation and cleanup of the northern portion of the site.

- Under the terms of the Purchase Agreement between Wayne County and MSC, MSC is required to invest $20,000,000 in two
- In 2017, Wayne County acquired 183 acres of the 197-acre southern portion through tax foreclosure. Wayne County then
- In 2000, DSC filed for bankruptcy. In 1996, the McLouth bankruptcy estate sold the McLouth facility to Hamlin Holdings, Inc.
- DSC tried without success to restart steel operations.
- In 2000, DSC filed for bankruptcy.
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 RTTR). 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-liable 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.

By 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](http://www.epa.gov/superfund/mclouth-steel)

2. Current Activities
2.1 Operations Section
Narrative

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
A 2nd community advisory meeting was held on January 23, 2020. The next meeting is scheduled for February 13, 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

<table>
<thead>
<tr>
<th>Type of Waste</th>
<th>Monthly Total</th>
<th>Cumulative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Friable ACM</td>
<td>0 Yards (0 Truck Load)</td>
<td>2,420 Yards (66 Truck Loads)</td>
</tr>
<tr>
<td>Galbestos Sliding</td>
<td>0 Tons</td>
<td>3,049.57 Tons</td>
</tr>
<tr>
<td>Const. &amp; Dem Debris:</td>
<td>3.63 Tons</td>
<td>12,693.78 Tons</td>
</tr>
<tr>
<td>PCB Transformers:</td>
<td>0 Tons (0 Transformers)</td>
<td>466.8 Tons (85 Transformers)</td>
</tr>
<tr>
<td>Liquid Waste:</td>
<td>15,455 Gallons</td>
<td>2,790,881 Gallons</td>
</tr>
<tr>
<td>Freon/Refrigerant Units:</td>
<td>Waste Removal Complete</td>
<td>70 units drained, recycled</td>
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<tr>
<td>K061 Liquid Waste</td>
<td>1,976</td>
<td>32,956 gallons</td>
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<tr>
<td>K061 Hazardous Waste:</td>
<td>Waste Removal Complete</td>
<td>8 Vac/roll-off Boxes</td>
</tr>
<tr>
<td>K062 Liquid Waste</td>
<td>Waste Removal Complete</td>
<td>101,539 Gallons</td>
</tr>
<tr>
<td>K062 Solid Waste</td>
<td>Waste Removal Complete</td>
<td>50 Cubic Yards</td>
</tr>
</tbody>
</table>

Work Progress Update
- Area 4A – AOC50(6) (South Motor Room Basement) Liquid treatment of liquids from SMRB – 100%
- Area 4A – Demolition of South End of Mill Building
- Area 4C – 14 transformers shipped off site for disposal
- Area 4C – Capacitors shipped off-site for disposal
- Area 4C – Roll-off of PCB transformer parts shipped off-site for disposal
- Area 7 – WMU 43 (Concast Grit Basin) - Breaking concrete knee walls and backfilling – 100%
- Area 7 – WMU 44 (Fuel Oil Storage Tank) - Backfill to grade with inert material 50%
- Area 13 – Concrete breaking slab pit walls – 75%
- Area 13 – Brick and Steel loadout of Stoves #4 & #5 completed – 100%
- Area 14 – Removed non-hazardous drums from area and loaded into roll-off box for off-site disposal – 100%
- Area 23 – WMU 1 (Sedimentation Basin) – Backfilling of Sedimentation Basin completed – 100%
- Area 25 – Concrete breaking pillar/remain of building

ANALYTICAL DATA RECEIVED
- Air Monitoring –
  - 8 Vac/roll-off Boxes performed on December 4th, 11th, 17th, and 24th - no exceedance
Waste Characterization Analyses
- AOC60(b) - (South Motor Room Basement)
- A-8 (Continuous Casting Basement & Tunnels)

Other Activities
None

2.2 Planning Section
Planned Work
- Area 4A – Demolition of South End of Mill Building
- Area 4A – Scrap load out for salvage
- Area 4A – Torch cutting large beams for salvage, and shearing steel for salvage
- Area 4A – WMU 51 (Six Stand Oil Basement Sumps) - Torch cutting of equipment
- Area 4A – South Motor Room and Basement preparation and planning for cleaning, abatement, and demolition activities
- Area 4B – Concrete breaking of above grade structures
- Area 4C – Mezzanine cleaning in preparation for demolition
- Area 13 – Concrete breaking slag pit walls
- Equipment Maintenance
- General Housekeeping

Issues
- On December 11, monitoring Stations 1 and 4 shut down early due to dead batteries.
- On December 17, monitoring Station 3 did not start properly due to an inlet tube blockage.
- On December 17, monitoring Station 4 shut down early due to a dead battery.

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.