McLouth Steel Superfund Site Community Advisory Group (CAG)

TECHNICAL MEETING SUMMARY

April 8, 2021 | Virtual Meeting No. 2

MEETING IN BRIEF

The April 2021 meeting of the McLouth Steel Superfund CAG took place online as a Zoom webinar on April 8, 2021. The objectives of that meeting included:

- An overview of the Public Health Assessment process
- Updates on
 - McLouth Superfund Removal Work
 - Updates on the Northern portion of the Site
- CAG work planning and member updates
- Public Comment

Please see **Appendix A** for a list of primary CAG members who were present. The recordings for this and previous CAG meetings have been posted on YouTube here: https://bit.ly/3dPYdHX.

ACTION ITEMS

Responsibility	Item
CAG	n/a
Members	
EPA/EGLE	EPA to post all meeting materials, including any (updated) slides presented and links to recorded meetings, on the CAG website: www.epa.gov/superfund/mclouth-steel
	EPA and EGLE to send torch cutting and other McLouth process updates (e.g., data, timing information, etc.) via CBI
СВІ	Produce and Distribute April Meeting Summary

DECISIONS REACHED & PROPOSED TOPICS FOR FUTURE DISCUSSION

Decisions Reached

- CAG and public questions or concerns about clean-up or investigation activities at the McLouth site should be sent to EPA, EGLE, and/or Stacie Smith, CAG facilitator, and information or responses will be sent to the CAG to disseminate to the public.
- An outstanding question appendix will be added to all meeting summaries starting with the April 2021 summary (see **Appendix B** below).
- The next meeting will be held in July 2021. [Note: proposed date, July 8, but may change to match final report of MSC work on the site.]

Proposed Topics for Future Discussion

• Regular updates on the PHA process, results, and recommendations

- A presentation from EPA on the Superfund Remedial process and updates on work
- A presentation from EPA on the final report of removal activities under the Settlement Agreement
- Updates on northern portion of the site (specifically on the conclusion of Phase 1 and update on Phase 2)
- Update from GLNPO on sediment testing and remediation in the Detroit River
- Requested update from MSC on development plans

SUMMARY OF DISCUSSIONS

Consensus Building Institute (CBI) facilitator, Stacie Smith, welcomed everyone, explained the features of using the Zoom Webinar interface for all participants, and reviewed the meeting agenda and ground rules. Slides used by the presenters can be found on the EPA McLouth Superfund website here: www.epa.gov/superfund/mclouth-steel.

Public Health Assessment

Dr. Puneet Vij, Michigan Department of Health and Human Services (MDHHS) Toxicologist, provided the CAG with an overview of the Public Health Assessment (PHA) process. He explained that a PHA is an evaluation of information about hazardous substances in the environment to assess potential past, current, and future impacts on public health. This can lead to development of health advisories and other recommendations, and will identify studies or actions needed to evaluate and mitigate or prevent human health effects.

Dr. Vij noted that the assessment process usually takes a year and is conducted by MDHHS through a partnership with the federal Agency for Toxic Substances and Disease Registry (ATSDR). He reviewed the PHA process, noting that: it is triggered by petition, addition to a national priorities list, or another agency request; takes into account specific data inputs focused on the environment, exposure pathways, health effects, and community concerns; scientifically evaluates health and exposure effects; produces a PHA report, letter, health consultation, or advisory, and; results in outcomes such as follow-up health actions and/or technical assistance to other agencies. He noted that McLouth Steel's exposure pathways were soil, groundwater, and air, and explained the contaminants of concern for each. Finally, Dr. Vij underscored that community input during each phase of the assessment is key, particularly because community members are able to provide site-specific information in defining exposure pathways (e.g., as odors, fishing locations, etc.).

CAG members offered the following comments and questions (answers in italics).

- Does the human health assessment typically involve soil, gas, or groundwater sampling?
 - MDHHS: No, it does not typically involve this. Depending on the site, I look at all the mediums. The ones selected were the ones that we thought were happening. This is reviewed with ATSDR and then things like air are selected.
- How is the community notified to participate in the PHA? For example, If I live close to the site, do I get a letter? Am I interviewed? Am I visited at home?

- <u>MDDHS:</u> Anyone on the CAG can be a part of the process. I always attend these CAG meetings, so in these meetings you can tell me your concerns or reach out directly via email/phone number. If there are any concerns, reach out.
- If a site has not been fully characterized as to existing contaminants and their concentrations, how can the PHA be conducted properly?
 - MDDHS: If there are data gaps, the recommendation is to do more sampling and then after this is done, the PHA is updated.
- How does the PHA take into account or determine if dust that blows off the site will affect the health of residents living downwind of the site?
 - MDDHS: As we do not have any data regarding this, I cannot say at this point whether it will have impact. This is why we are conducting the PHA. The PHA will address any concerns the community has, which is why I'm asking CAG members to reach out regarding health-related questions. However, I'll confirm with my team.
 - EPA: The process is to look at all the pathways where contamination may be at the site, and then determine whether it is leaving the site and coming in contact with people. They will look at GW and soil sampling and if they don't have enough data to determine if a pathway is complete, they will recommend that Nabil go out and collect further information to do so.
- Is there an estimate for when the report will be ready?
 - MDDHS: It has to go through MDDHS and ATSDR approval; at this point, we estimate one year.
- Before recommendations are given, are proposed uses of the property taken into consideration, and if so, how are we assured that there is no bias towards one use over another?
 - MDDHS: I need to look into this and get back to you.
- Can you clarify if the exposure pathway of ground water is eliminated in the future, or currently? Are there any pipes that feed water along the property that feed drinking water to the public? I would like there to be further confirmation that there is NO potential for contamination.
 - <u>EPA:</u> There are no drinking water mains, there are fire mains; water mains are pressurized, under normal conditions there will not be anything that is pressurized so contaminants are unable to get in. EPA does not know of any water mains that run through the property, only service lines that run to the fire hydrants. The service line has been turned off from when they demolition the building.
- Is asbestos the only chemical via airway to be considered for exposure? There is a considerable amount of manganese on the property prone to being blown by the wind. What about prolonged exposure?
 - MDDHS: The level of manganese noted is below the ATSDR screening level.
 However, I will add this to back to the PHA.

- <u>EPA:</u> These exposure pathways could expand as Dr. Vij further reviews the research.
- On groundwater/air, I'm concerned that water could be a transporter of subsurface heavy metal. I am also aware that heavy metals can release vapors, and come up through the soil, so I am wondering if there will be any investigations about this and at what radius? Due to the construction of the sub-sediment, there is potential for high travel, and ingestion is more than just drinking water, it could give us troubles in other ways.
 - o <u>MDDHS:</u> I will need to confirm with my Vapor Intrusion Team who deal with the science of contamination. I will contact the Vapor Intrusion toxicologist.
 - <u>EPA:</u> Manganese is a large site contaminant; it is the only metal that exceeds the soil inhalation criteria. This is one of the reasons we were sampling for it on the perimeter, it is good to bring this up and make sure that it is included in this pathway analysis.
- If the EPA's remedial investigation takes 4-5 years to complete, does that mean the final PHA report will be issued after that time, in order to make use of all the data being collected? Will you be examining subsurface sediments?
 - MDDHS: I will review the Expanded Site Investigation report, and depending on the soil depth and boring, we will determine from this what the recommendations are. This is a really extensive report with a lot of data. I can update you at the next meeting. There will be a one-month comment period when the report is finalized.
- How should people who are not on the CAG reach out about their health concerns? How should the local community reach out with their concerns, and how do you track this?
 - MDDHS: I will reach out to my supervisor and there is a health educator and a community engagement person so we can speak to them to make sure we reach out as much and possible where folks are able to reach out to us
 - <u>CBI</u>: Work with Brian, Diane, Stacie, and the CAG leadership board to get this information out, answered, and questioned.
- Are cancer clusters in and around the site something that the PHA gets into or is
 this just trying to create a causal connection. There are trends around particular
 illnesses, that indicate that certain things are driving these trends and it is likely
 linked to industrial activities in the area? Will any of these current trends play into
 the data you will be gathering. Use of the property now vs. what it was doing
 historically but getting back to concerns re: what contaminants are on the soil, in
 the soil, under it.
 - MDDHS: I will reach out to the community engagement person, and those questions will be answered in the PHA. It depends on the health-related issue, we cannot quantify what happened in the past, but these concerns will be addressed in the PHA.
- A number of years ago (~10), there was a spill where water that contained a
 corrosive substance ran off the north end of the site in the street, coming into
 contact with a motorcyclist. Is there any information that has been looked at

about whether and/or how that issue as resolved? Is there continued contamination that has leached into Jefferson Avenue? There is a continued puddle at the intersection of Ford and Jefferson that is frequently flooded. Is it runoff? Are you aware of this and have you looked at this incident?

- EGLE: I can speak to this: A reactive barrier was installed to prevent the high pH leach agent from entering the street. Wayne County has responded that the puddle is caused by poor drainage, which will be addressed as part of a Jefferson Ave repaving project, which was slated for last summer but delayed by covid. EGLE has measured the pH of the puddle at 7.1-7.2, not the bleach level that it was when the event occurred a decade ago.
- <u>EPA:</u> To determine the cause of that high pH leach agent, we dug out and put in clean material, which stopped the leach agent from going to Jefferson Ave, as well as into the creek. This was a short-term fix, and this was a key reason for listing the site on the NPL.
- How do we determine the radius of concern for contaminants traveling in water, dust, or sediments? What is the reach of determining the area for McLouth Steel?
 - <u>EPA:</u> Superfund applies to contamination from the site that travels beyond site boundaries. I don't know the answer to how far out, this will be addressed through the remedial investigation.
 - <u>EGLE</u>: This is also true for the Northern portion; the site owners are responsible for all contamination emanating from the site.
- Can we expect any new EPA regulations/changes under the new administration that might affect the cleanup?
 - <u>EPA:</u> President Biden has been signing executive orders regarding both environmental justice and the climate accords, but regarding superfund there doesn't appear to be anything new. I am not sure how the new administration would change this specific work.
- You mentioned this spring they will be cleaning debris and collecting odds and ends. They've created quite a pile of debris, including remnants of piles of previously dropped cylinders; it is a huge mound. Will this be removed offsite?
 - <u>EPA:</u> I'll need to take a look because I have not been to the site for a while. I will check into this and find out the answer. If it is the yellow brick from the furnaces, it needs to go. [Note: EPA looked into this and reports that the stoves demolished by DSC (previous owner) are a preexisting condition. MSC is not obligated to remove this material but may choose to do so. If not, it will be included in the Superfund project.]
- There are many questions that have been asked, today and over the course of our interactions, that have not been answered. We are told "we'll get back to you," and then no one does. Some of these questions are: "what is the purpose of these meetings? How are of the standards for the health assessment and cleanup determined, and does the City of Trenton's recent rezoning impact these standards? How do you enforce the violations (e.g., for asbestos)?
 - <u>CBI</u>: One of the purposes of these meetings, and the CAG as a whole, is to ensure that the community's questions are answered. The facilitation team

and CAG leadership will work with EPA to create a more effective process for tracking the questions from CAG and community members.

Update on the McLouth Superfund Removal Work

Brian Kelly, EPA Region 5 On-Scene Coordinator, provided an update on the removal work happening at the McLouth superfund site. He noted that work had slowed since the beginning of January due to operations being shut down, so not many changes had taken place. However, MSC planned to begin work again in the coming weeks. That work will include backfilling of trenches and lagoons, and demolition of the 2 remaining stoves, and cutting of the four remaining skulls. ASTI is currently working on the plans for these processes, and must notify EGLE prior to beginning work. He conveyed that the current dust control plan would be implemented, that overseeding would be explored. Following the conclusion of these activities, EPA would then inspect site, and ASTI would have 45 days to submit a final report. EPA will inform the CAG when this occurs.

On behalf of Nabil Fayoumi, Region 5 Remedial Project Manager, Diane Russell, EPA Region 5 Community Involvement Coordinator, provided a brief update on the Remedial Investigation (RI). She reported that they had received federal funds to begin work on the RI and the Feasibility Study (FS), that Mr. Fayoumi was in the process of working on a cost-estimate, and expected contracting to be underway and awarded in June 2021. She further detailed that once site-specific plans were completed and approved, the fieldwork would commence as early as fall 2021 or the following construction season in 2022. Ms. Russell concluded by emphasizing the importance of both CAG members and the public including the Community Involvement Team (Kirstin Safakas/Diane Russell) when reaching out to EPA for information as it is their role to be the "loop-closers". Finally, Mr. Fayoumi can be expected at the next CAG meeting.

CAG members offered the following comments and questions (answers in italics).

- Can you describe the material that has been used and will be used in the future to backfill the trenches, sumps and lagoons?
 - o EPA: Backfill is still road millings.
- I want to confirm, doesn't this introduce new chemicals into the site?
 - <u>EPA:</u> It does not. It is road millings; they are pretty standard use for filling at many sites. They did use some of the soils from the site and what was allowed was based on the analysis results.
- Are the 12 acres owned by DSC included in the Superfund clean-up?
 - o EPA: Yes, they are.

Updates on the Northern Portion of the Site

Jacob Runge, EGLE Engineer, provided the CAG with a brief update on the northern portion of the McLouth Steel site. He highlighted he was still waiting to receive several of the reports due on Monday, April 12, including the Ground Water Investigation Report, as well as reports on waste management. Mr. Runge emphasized he still intended to alert the CAG when torch cutting work resumed on the Superfund site and reiterated that the CAG could anticipate

remobilization efforts towards the end of the month, with anticipation of being fully operational by May 1, 2021. Finally, he underscored his willingness and availability to remain a CAG point of contact for any questions, comments, or concerns regarding state-related activities.

CAG members offered the following comments and questions (answers in italics).

- Will you be looking at the BASF Federal Marine Terminal and if the incident that happened there had an impact on the north Monguagon Creek area? There are old 55-gallon drums that were buried. It used to be an industrial dumping site.
 - <u>EGLE:</u> I can work to get some of this answered with the ground water Investigation Report. If there is some mark of contamination, Riverview Trenton RR Company would be responsible for a plume or contamination caused because they were the owners of the land that it was originating from.
 - o <u>EGLE:</u> I will keep it in mind and look for marker chemicals and any sign of a plume that would not have originated on site.
- Is there conductivity of groundwater through the site and out into the river? Their remediation with respect to the sediment wall will be determined by whether or not ground water is flowing out into that area. So, can you confirm that you can work together to determine if there is an issue?
 - o <u>EGLE</u>: Yes, for both the liable party and on partnering to determine if there is an issue.
 - <u>CBI</u>: GLNPO will come to the next meeting to provide updates on the norther portion of the site as well.
- Last time you had a presentation and there was an explanation of Phase 1 & Phase
 2. Could you clarify what phase we are in?
 - EGLE: We are still in Phase 1, which is to establish current site conditions. The Corrective Action Consent Order was finalized for this phase in August 2018 and the deadline for completing Phase 1 is April 12, 2021. The next step is to then use this collected information to build a Phase 2 corrective action consent order, in which the state clearly outlines the expectations of work that needs to be done by the viable and liable party.
- You mentioned that there is not a firm dust suppression plan for the continuation of the skull torching. Have you heard anything back from ASTI?
 - <u>EGLE:</u> ASTI have not mentioned a change in plans, they initially prepared steps they would take (e.g., consulting weather the morning-of). They have been working with Air Quality on BMPs for dealing with the smoke, but I have not seen or heard any firm plans for the stove dropping or resumption of the torch cutting.
- If the public wants to report something, the appropriate response would be to call EGLE?
 - <u>EGLE:</u> Correct, call the Pollution Emergency Alerting System (PEAS) 24-hour hotline number, which is 1-800-292-4706, or submit a complaint online. The site will be contacting the agency every day if they are hoping to torch cut,

and the Air Quality Division is cognizant of this site being physical and will require that they follow the law.

- Will the measuring of iron particulates still be taking place, and will the data still be available to us through any agencies?
 - <u>EGLE:</u> BMPs will be looking at the weather and contacting agencies, and to my knowledge they still intend to do this. Any report sent to EGLE is public information unless it includes confidential business information.
- When will we get a firm answer on whether MSC will be overseeding and what areas they will do this? It is getting late in the season to grow grass.
 - <u>EPA:</u> under the settlement they are required to do air monitoring and dust suppression for that work. MSC is aware they may need to take additional steps. EPA cannot make them do hydroseeding, but they have been told they need to control the dust. If dust is determined to be a nuisance to the public, they can get violations. MSC is aware of the CAG's concerns, and they have told us that they are evaluating doing hydroseeding after Phase 1 is complete.

CAG WORK PLANNING, MEMBER UPDATES, & PUBLIC COMMENT

EPA Updates on Facilitation

Diane Russell, EPA Region 5 Community Involvement Coordinator, provided an update on securing additional funds for professional facilitation for the CAG. She explained that in 2020, despite the pandemic, the CAG was able to continue seamlessly in large part due to facilitation support. The region had initially not provided funding beyond the current April meeting. However, just today she was notified that EPA HQ approved funding through December 2021. As such, the CAG can continue its website building as well as facilitation of quarterly meetings. She highlighted the importance of the CAG in light of the complexity of the McLouth Steel site, with all its moving parts and issues that are relevant to the community, and the value of the level of interest and community engagement so far.

CAG members offered the following comments and questions (answers in italics).

- I think Zoom is a good format for broad participation. If we have in-person meetings as opposed to Zoom, does this affect the budget? Is it more expensive? Would it be fewer meetings?
 - <u>EPA:</u> Travel costs do increase the budget somewhat. However, the bulk of the funding is spent on time and prep, doing the summaries, and working on building a website, which will add time. We are currently budgeted for only one in-person meeting.
- What is the annual budget for the CAG?
 - EPA: On average, it is about \$5K per meeting.

Public Comment

- Thank you for initiating and taking action on my questions and concerns about signage. I have noticed that an official superfund sign is on the property. This makes me feel good. Can you also please briefly answer how and when the general public will be included to gather information for the PHA? Why is this superfund site unique in not having a transparent plan for this?
 - <u>CBI</u>: CBI is noting the request for clearer information on how community voices will be involved in the PHA. MDHHS will work with their community engagement (CE) team to come back with a clear and precise answer to this question.
 - MDHHS: This is my first superfund site, but for every site there is a CE person who can join these calls for questions to be answered. I will need to speak with them and get back to you.
- A health study was conducted for the NPL site in Gibraltar, and I as an abutter was never contacted. We should be notified of how we can have input and ask questions.
 - <u>CBI</u>: Yes, MDHHS needs to clarify the procedures community involvement for these PHAs.
- Will the PHA include samplings to see if any contaminants have migrated through groundwater offsite? Is it part if the procedure to investigate what is offsite, on the ground, or on the surface?
 - o [Note: this was answered earlier: The remedial investigation will examine this.]
- Is any of the material being removed from these sites being deposited to the Sibley Quarry Landfill or in the Riverview Land Preserve?
 - Trenton: Nothing is being deposited in the DTE Riverview quarry. What is acceptable was sent to Riverview and other materials were sent to other sites that accept the materials based on EGLE/EPA regulation. [Note: This was later clarified: 21st Century Salvage/Next Generation Environmental has sent no waste to Riverview Land Preserve. Cognent Recovery, through Taylor Recycling, sent two 30 cubic yard boxes of shredded tires to Riverview Land Preserve. The first on 1/28/2019 and the second on 2/20/2019.]
- According to Ashtracker.org site 482 (4695 W Jefferson) has listed that the Trenton channel powerplant has 8 ground water monitoring wells and that these are all polluted above federal advisory levels based on 2016-2018 sampling. Reportedly there are unsafe levels of sulfate, lithium, radium arsenic, fluoride, and molybdenum and I am wondering how much has made it to the site we are talking about this evening?
 - EPA: I believe they are talking about the fly ash that has been dumped in the quarry over the years. We have reviewed our groundwater data and found that there are mostly pH probs specific to the pickle liquor that was being conducted at the site (low pH), slag (higher pH), and there were some other chemicals found, but they were not related to other sources, but the site contaminants. Nabil as part of the investigation will be taking many more groundwater samples to determine what, if anything, is leaving the site.
 - So, to confirm, you do not know the concentrations of sulfate, lithium, radium arsenic, fluoride, and molybdenum on this site?
 - <u>EPA:</u> Some of those parameters were in the samples taken, but not all of them.

WRAP UP & NEXT STEPS

Ms. Smith thanked the CAG for their participation and reiterated the importance of the CAG to raise serious issues to be discussed. She expressed that many of the topics the CAG engages around were intense and that answers to questions were not always complete, and that the CAG leadership would find ways to track responses and unanswered questions more clearly. She reminded the CAG that the next meeting was tentatively scheduled for July 8, 2021. [Note: this may shift to ensure that the next meeting occurs after completion of removal work on the site.] She noted that the Leadership Board would continue to meet to plan and address action items, and that input from the CAG was always welcome. She concluded by thanking the CAG for its participation and noted that the DRAFT meeting summary would be sent out soon.

The meeting adjourned.

Appendix A. CAG Stakeholder Representatives in Attendance

Primary and Alternate CAG representatives present at the **April 8, 2021** meeting are listed below.

Representative	Affiliation
Bill Heil	Gross Ile Civic Association
Brian Webb	Riverview Brownfields Authority
Bryan McMurran	Liaison for Rep Debbie Dingell's Office (Trenton)
Doug Thiel	Gross Ile Nature and Land Conservancy
Emily Hornbeck	At-large Community Representative
Greg Karmazin	Gross Ile Civic Association
Jim Wagner	City of Trenton
Judith Maiga	At-large Community Representative
Kevin Langley	Grosse Ile Township
Larry Ladomer	At-large Community Representative
Robert Burns	Friends of the Detroit River
Robert V Johnson	Abutters
Ryan Stewart	At-large Community Representative
Wendy Pate	Trenton Visionaries

Appendix B. Outstanding Questions

- How and when will public engagement for the PHA occur? How should people who are
 not on the CAG reach out about their health concerns? How should the local community
 reach out with their concerns, and how do you track this? How and when the general
 public will be included to gather information for the PHA? Why is this superfund site
 unique in not having a transparent plan for this?
- How does the PHA take into account or determine if dust that blows off the site is currently (or will affect) resident's health that live down wind of this site?
- Before public health and remediation standards are determined and recommendations given, are proposed uses of the property taken into consideration, and if so, how are we assured that there is no bias towards one use over another? Does the City of Trenton's recent rezoning impact these clean-up standards?
- Regarding the chart in the presentation, could you clarify if the exposure pathway of ground water eliminated in the future, or currently? Are there any pipes that feed water along the property that feed drinking water to the public?
- On groundwater/air, I'm concerned that water could be a transporter of subsurface heavy metal. I am also aware that heavy metals can release vapors, and come up through the soil, so I am wondering if there will be any investigations about this and at what radius? Due to the construction of the sub-sediment, there is potential for high travel, and ingestion is more than just drinking water, it could give us troubles in other ways.
- Will the PHA (and remedial investigation) include samplings to see if any contaminants have migrated through groundwater, surface water, or dust offsite? How do we determine the radius of this? What is the reach of determining the area for McLouth Steel?
- How does the State and EPA enforce violations (e.g., for asbestos)?