

McLouth Steel Superfund Site Community Advisory Group (CAG)

TECHNICAL MEETING SUMMARY

July 22, 2021 |

MEETING IN BRIEF

The July 22 2021 meeting of the McLouth Steel Superfund CAG took place in a hybrid format with participants in attendance at the Trenton City Council Chambers and online in a Zoom webinar. The objectives of that meeting included:

- Updates on
 - McLouth Superfund Removal work
 - Clean-up in the Northern portion of the Site
- Community Engagement in the Human Health Assessment
- Update and Overview of the McLouth Superfund Remedial Process
- 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> .

A list of outstanding questions can be found in **Appendix B**.

ACTION ITEMS

Responsibility	Item
CAG Members	<ul style="list-style-type: none">• Provide feedback to improve the accuracy of the Draft July Meeting Summary• Disseminate Final July Meeting Summary to community members
EPA/EGLE	<ul style="list-style-type: none">• 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.) and relevant correspondence via CBI
CBI	<ul style="list-style-type: none">• Produce and distribute the Draft July Meeting Summary, integrate CAG feedback to refine, and send final for CAG dissemination and EPA posting.

DECISIONS REACHED & PROPOSED TOPICS FOR FUTURE DISCUSSION

Decisions Reached

- CAG and public questions or concern about cleanup 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.
- CAG members and members of the public can file a complaint about air quality nuisance due to torch-cutting or other activities by visiting www.michigan.gov/air and clicking

“Submit an air quality complaint” on the right of the screen, or by calling the Pollution Emergency Alerting System (PEAS) hotline at 800-292-4706.

- The next meeting will be held in fall 2021. Date TBD

Proposed Topics for Future Discussion

- Regular updates on the Public Health Assessment process, results, and recommendations
- A presentation from EPA on the final report of removal activities under the Settlement Agreement (depending on timing)
- A presentation on the conclusion of Phase 1 and update on Phase 2 on the northern portion of the site
- Update from GLNPO on sediment testing and remediation in the Detroit River
- Updates from EPA on remedial activities, if any

SUMMARY OF DISCUSSIONS

Consensus Building Institute (CBI) facilitator, Stacie Smith, welcomed everyone, oriented in-person attendees with the layout of the Council Chambers (including locations of microphones), 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.

Update on 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 shared a time-lapse video which showed that most of MSC’s removal work on the site had been completed. There are lingering tasks, such as the backfilling of lagoons and basements. EPA expects to carry out a final walk-through of the site in mid-August or early September. Once work is complete, MSC has 45 days to produce a report, on receipt of which EPA would issue a notice of completion of work done under the settlement agreement.

MSC also plans to complete cutting and removal of the metal ‘skulls’ on the property. The torch-cutting will take place with enhanced air monitoring and oversight by EGLE Air Quality Division (AQD). This would complete the removal phase.

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

- **Is the smoke emitted during the cutting of the skulls detrimental to human health?**
 - *EPA: We understand that what people see concerns them. The process is exempt from an air use permit, and will be reviewed by EGLE. MSC will carry out enhanced air monitoring for iron and manganese particulates.*
- **Given that conditions on the property are becoming dry, are there any plans for hydroseeding on the areas that they have cleaned (outside of parking lots, etc.)?**

- *EPA: I have heard them say in other meetings that they are going to implement dust control measures, but I have yet to see a concrete plan from them.*
- **As things progress from the first to the second phase, is there any further land clearing or similar site work expected?**
 - *EPA: Not to my knowledge.*
- **If the property is developed as a logistics hub, are there any potential effects of trucking (leaks of hydraulics and fuels) and other logistics operations on stormwater flow into the river?**
 - *EPA: Part of the settlement work required a study into their stormwater issues, which shows that stormwater does not currently leave the site via overland flow, though this may change with future development plans.*
- **How can the public trust the information being provided by the EPA when there appear to be inconsistencies in answers given regarding the feasibility study?**
 - *EPA: We have been transparent and have given the best answers while making clear that we do not always have all the answers.*
 - *CBI: We'll be hearing from Nabil Fayoumi later about the feasibility study so he may be able to answer some of those specific concerns then.*
- **Was the position to put monitors around the torch area voluntary or mandated by EGLE or EPA?**
 - *EGLE: I do not know who brought it to the table, but my guess is that it was a strong recommendation from EGLE Air Quality.*
- **Will the air quality data be made public? Will there be a report?**
 - *EGLE: I will publish whatever I receive on the EGLE website and circulate with the CAG.*
- **What dust suppression measures will be put in place during the process of skull cutting?**
 - *EGLE: Measures will include weather conditions, DustBosses, and regular wetting. If there is a buildup of smoke, they are expected to cease work. An air quality inspector will be on site early next week.*
- **Does the smoke contain contaminants that are harmful to public health?**
 - *EGLE: The process may be a source of air contaminants, but torch cutting operations that are conducted as part of a dismantling or demolition operation are exempt from permitting if they do not violate specific criteria listed in the exemption. [Note: the exemption reads: "portable torch cutting equipment that does not cause a nuisance or adversely impact surrounding areas."] If the air quality level becomes a nuisance, members of the public may file a complaint at www.michigan.gov/air or by calling the PEAS hotline.*
- **Over the years there has been incidents of red smoke (iron oxide), as a result of which they were forced to put in air cleaners. Now it appears that a loophole has arisen because the work is temporary. Could you explain the difference between the operational standard and the temporary standard for air quality? Is there any discretion on the issue for the agency or is it legally binding?**

- EGLE: *I can't answer offhand because I am not an air quality specialist, but under air quality rule 278A, not only does the operation have to be temporary but there is a ceiling on the level of emissions which that may not transcend. EGLE Air Quality was satisfied that the work was not going to meet that ceiling based on calculations presented.*
- EPA: *There is no discretion on the issue since MSC has met the exemption under that specific rule. However, if members of the community make complaints that the work is causing a nuisance, then it would violate a separate rule which would require them to cease operations. I will circulate correspondence with EGLE about the torch cutting and how the exemption was met. [Note: that correspondence has been attached to this summary as Appendix C.]*
- **Recently we have had very heavy rain events. Are we getting any sheet water runoff during those events?**
 - EPA: *There is no overland sheet flow. The site is very porous, except for one area where trees used to be planted but this is no longer the case.*
 - EGLE: *I have not been at the site during a rain event, but water tends to run inward 20-30 yards from Jefferson Avenue, then flows into the creek.*
- **How many skulls are there and how many cuts need to be made? How many tons do the skulls weigh?**
 - EPA: *There are about 3 and a half skulls, and they estimate that the process will take 3 weeks. I do not know how many tons they weigh but something considerable.*
- **Crown has a transportation company. Is there a plan to move the skulls somewhere else to be cut?**
 - EPA: *We cannot really dictate what they do with them once they meet the exemption.*
 - EGLE: *It is my understanding that the weight is so extensive that they would violate load rules.*

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 that the April 12 date by which RTRR was due to complete work was extended due to contractor issues related to COVID-19, after which document review should take one month. The new deadline for completion of work and submissions is August 13. He hopes to have an update on the next enforceable document at the Fall 2021 CAG meeting.

Mr. Runge reiterated that the process is currently in phase one, which involves investigating the five waste management units, preparing and implementing a dust control plan, investigating groundwater contamination, evaluating stormwater management, and utilizing the relevant environmental protection standards. He explained that phase one will define the future phase two, which involves implementing the corrective and mitigation measures identified, monitoring, further investigations. He further reminded CAG members and members of the

public that they can submit an air quality complaint by visiting www.michigan.gov/air and clicking “Submit and air quality complaint” on the right of the screen, or by calling the Pollution Emergency Alerting System (PEAS) hotline at 800-292-4706.

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

- **There was some remediation work done on materials leaching into street and accumulating. What was the ultimate disposition of those materials?**
 - *EGLE: It is safe to assume that there a lot of areas with high pH on the site. I have observed wells being drilled on the site.*
- **Have we made any progress on the 12 remaining acres owned by the other party?**
 - *EPA: No cleanup work has been done on the remaining parcels owned by Detroit Steel Company. That land is part of the Superfund site, and will be included in Mr. Fayoumi’s work.*

Community Engagement in the Human Health Assessment

Andrea Keatley, Environmental Assessment and ATSDR Unit Manager at MDHHS, and Dr. Puneet Vij, project manager and toxicologist at MDHHS, provided the CAG with an overview of plans for community engagement in the public health assessment (PHA) and addressed concerns raised in previous meetings. They were also joined by Carolyn Koch, Community Engagement Program Coordinator, and Sabina Emerenini, health educator.

Ms. Keatley reminded the group of the steps involved in conducting a PHA. The first step of the assessment involves a trigger event, which in this case was the listing of the McLouth site as an NPL site in 2019. The second step involves gathering information, environmental data, and exposure pathway routes, and formulating a plan. The ATSDR team is currently at the beginning of the second step. Dr. Vij has met with EGLE and is looking into exposure pathway routes for past, present, and potential future exposure, and identifying those who have been affected. Dr. Vij is also looking at health-based screening values, which are the thresholds against which samples of hazardous substances and pathways are compared. Once the analysis is complete, there will be a meeting with ATSDR to review the results.

Ms. Keatley highlighted that their approach to the McLouth site is not unique, as the PHA process is governed directly by CERCLA. She further highlighted that community engagement is an important part of that process, which is why they attend CAG meetings. Ms. Keatley encouraged CAG members to reach out to her and Dr. Vij during meetings or at any time with questions and concerns, and that the team will come to the CAG with specific questions for the community at a later phase.

Dr. Vij further elaborated on the PHA process for the McLouth site. He is currently reviewing data from EGLE regarding the site history and possible hazardous substances. If there are gaps in the data, he will make recommendations to further capture these. He also highlighted that the assessment is not biased toward any potential future use of the site. Dr. Vij expects that the exposure pathways to be investigated are air for workers and residents nearby (specifically manganese and asbestos (which he expects to be eliminated once demolition work is

completed)) and soil (for past workers and current demolition workers). He does not expect groundwater to be a pathway of concern for his assessment because no drinking water wells have been identified in the area.

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

- **Are the banks of the river and sediments that may be disturbed part of your assessment? How deep do they go?**
 - *MDHHS: At this point we have to investigate more; I hope to answer that question later when there is more data.*
- **Is there a way to identify potential clusters of diseases? Are resources like CDC death records available to you?**
 - *MDHHS: We have epidemiologists on staff who can prepare incident reports for cancer. I do not know how detailed that investigation can get.*
- **Is there no direction to investigate groundwater at the moment? If hazardous material leaches into the soil, groundwater flows could move it elsewhere, even if there are no wells on the site.**
 - *MDHHS: There is no direction at the moment because there are no drinking wells. If we receive more data, we may. Right now, we would not investigate groundwater, but EPA or other agencies may investigate it. From a public health assessment standpoint, we want to know how people are getting contaminants into their body. In the case of groundwater that is via ingestion, which does not take place because no drinking wells have been identified.*
 - *EPA: There could be other risks, e.g., ecological risks and pH issues, which would form part of assessments by other agencies.*
- **There is not enough data gathered yet in many fields to give direction on how the land should be used. So, there is not enough information yet to entertain a motion for use.**
 - *MDHHS: That is what we do not know yet. I am not sure if our assessment would make that determination.*
- **What are the sources of data that you use?**
 - *MDHHS: Environmental data comes from EPA, EGLE, and any other entity that has done sample collection (soil, air, water). We research our own data for health effects via literature reviews through ATSDR toxic profiles.*
- **How long will your project take?**
 - *MDHHS: To be truthful, a health assessment is never really completed. It is limited to the data we have. Each NPL site has a 5-year review process, after which recommendations and updates can be made.*
- **Someone could have a disease like cancer from a previous pathway that has since been eliminated. As new activity happens on the site, will that be included? Will we have to request that of you?**
 - *MDHHS: This will depend on the data that we receive. You are free to reach out to us. We will also be working in coordination with EPA and EGLE.*

- **Groundwater is leaving the site in large volumes and carrying contaminants into the river, which means that people eating fish could be exposed. Are these pathways to the public that you would consider?**
 - *MDHHS: Federal ATSDR is not convinced that this is related to the NPL site alone, though we are in discussion with them.*
- **Is your assessment on the NPL site (southern portion) only or the whole site?**
 - *MDHHS: We are only responsible for the NPL site (on behalf of federal ATSDR).*
- **Is there a water main running on the property? Would this be considered a pathway?**
 - *J. Wagner: There is a 10-inch main running along the property, but there was no access until demolition work commenced.*
 - *MDHHS: We would have to look at that. A pressurized water main carrying surface water is different from groundwater because it goes through a treatment process.*

Overview of McLouth Superfund Remedial Process

Nabil Fayoumi, Remedial Project Manager for EPA, provided the CAG with an outline and overview of the remedial process. He highlighted that EPA selected Great Lakes Architect and Engineering Services (GLAES) as the Remedial Investigation/Feasibility Study (RIFS) contractor. Technical proposals and costs are due on July 30, 2021, with a Task Order Award due on September 5, 2021. They would then have 60 days to prepare specific documents and work plans for the site, before starting field work in Spring 2022. He noted that to go from NPL listing (2019) to RIFS commencement in less than 3 years is commendable.

In order to facilitate and manage the investigation, remedy selection, and cleanup, the site will be divided into 3 Operable Units (OUs). OU1 involves source areas, surface and subsurface soils, and waste piles. OU2 involves groundwater. OU3 involves Trenton Channel surface water and sediment. Groundwater and sediment investigations will not be limited to the site boundary. Remedial Investigation fieldwork will start in Spring 2022 and will involve evaluating the nature and extent of contamination, assessing human and environmental risks, evaluating existing data, collecting samples, and installing monitoring wells. Mr. Fayoumi expects the contaminants of potential concern (COPCs) to be metals (arsenic, cadmium, chromium, mercury, manganese, lead), cyanide, PCBs, PAHs, TCE, DCE, and VC. However, the analysis will cover the full scan of the parameters, and their impact on current and future land use. The Human Health & Ecological Risk Assessment (RA) will determine whether the COPCs identified pose a risk to human health (via ingestion, inhalation, or dermal contact) and the environment. The RA restricts its analysis of future risks to the reasonably anticipated future land use.

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

- **Will wells be placed along the shoreline to monitor flow back and forth?**
 - *EPA: We will decide based on the data, but the investigation will be phased. Sediments and plumes will be tested as part of the Superfund site.*
- **Could you elaborate on possibilities for residential development?**

- *EPA: Under CERCLA and NCP, EPA realistically cannot clean-up to background levels (residential use) if there is no likelihood of that happening.*
- **How granular are the investigation and assessment (e.g., ground-level vs above-ground level residences)? Would such potential development be safe in the future? Is the level of cleanup determined on a portion-by-portion basis?**
 - *EPA: The monitoring wells will characterize the water, soil, surface water, and sediment currently on the site. The 5-year review process is in place to see if the remedy is still appropriate in case the situation changes in the future. If there remains residual contamination, we may need to look at it. It is difficult to address things like vapor intrusion because they have not been assessed yet.*
- **Does the standard of cleanup selected have an impact on the level of study done?**
 - *EPA: No, it does not change. The investigation will be as detailed as if it were a residential area. As we have seen on other sites however, it is a good idea to initiate conversations early about potential options for future use and then to work collaboratively. The site has a lot of potential for creative options.*
- **Is there a way to quantify the level of residual contamination against the residential standard? Can this be done in terms of quantity remaining, rather than hours of exposure?**
 - *EPA: Residual contamination means there is no risk associated with that contamination. The removal work (required by the settlement agreement with MSC) is different from the remedial work. Even though the removal work was done to a non-residential standard, it is hard to say what would have been different (given that the Superfund process would have been taking over regardless). The assessment will characterize the site and indicate what is still there.*
- **A lot of people are asking questions and creative potential options for future use that negotiate the residential/non-residential standards. These will take some time to get an answer for.**

CAG WORK PLANNING, MEMBER UPDATES, & PUBLIC COMMENT

Public Comment

- **I am really happy to see everyone in attendance here and want to thank you for paying attention to the political process. I appreciated the questions people asked. Please go and tell your friends and family about this and spread the word about this CAG.**
 - *CBI: All the materials (recordings, slides, etc.) will be uploaded to www.epa.gov/superfund/mclouth-steel. Members of the public can also reach out to stacie@cbi.org to get involved.*
- **How will the current sulfur dioxide nonattainment status in communities surrounding the McLouth Steel Superfund Site influence EGLE and the EPA's current research, decision-making process, funding, and remediation plan?**

- *EPA: Sulfur dioxide is a priority pollutant and an important concern. Until there is a reuse and development plan it is hard to know how the cleanup process might change. For the remedial investigation, we do not anticipate air to be a priority given that all demolition work will be completed.*
- [Note: A member of the public noted a proposal for the property that he wished to share with the CAG. That document has been attached as **Appendix D.**]

WRAP UP & NEXT STEPS

Ms. Smith thanked the CAG, presenters, and members of the public for their participation, questions, and comments. She reminded the CAG that the next meeting will take place in the fall and noted that the DRAFT meeting summary would be sent out soon.

The meeting was adjourned.

Appendix A. CAG Stakeholder Representatives in Attendance

Primary and Alternate CAG representatives present at the **July 22, 2021** meeting are listed below.

Affiliation	Representative
City of Trenton	Jim Wagner
Riverview Brownfields Authority	Brian Webb
Trenton Visionaries	Wendy Pate
Gross Ile Nature and Land Conservancy	Doug Thiel
Gross Ile Civic Association	Greg Karmazin and Bill Heil, alternate
Friends of the Detroit River	Robert Burns
DownRiver Waterfront Conservancy	Paul Frost
Abutters	Robert V Johnson
At-large Community Representative	Emily Hornbeck
At-large Community Representative	Ryan Stewart
At-large Community Representative	Eddie Traster

Appendix B. Outstanding Questions

- Are the banks of the river and sediments that may be disturbed part of the remedial assessment? How deep do they go?
- How detailed will the epidemiological analysis be? Is there a way to identify potential clusters of diseases? Cancer incidents?
- Any further exploration 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 HHA 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?
- How does the State and EPA enforce violations (e.g., for asbestos)?
 - “Federal air regulations have been delegated to state or local air pollution control agencies in Michigan.” <https://www.epa.gov/mi/air-standards-delegations-michigan> This is the reason EGLE Air Quality Division has been overseeing the air emissions.

Appendix D: McLouth Proposal from Fred Watson

I grew up in the Downriver area and am now a life member of the Grosse Ile Nature and Land Conservancy. Keeping the Detroit River and the surrounding communities clean and pleasant is, and always has been, very important to me. Starting in 2010, I contacted John Dingell about restoring the McLouth property back to its natural state, and incorporating it into the International Wildlife Refuge. In July of 2012, I wrote a two page proposal about the basic steps necessary to accomplish this goal, and sent it to Mr. Dingell, the Mayors of Trenton and Riverview, and the Supervisor of Grosse Ile. I have attached a copy of that 2012 proposal to the end of this letter.

After following the progress of the demolition of the McLouth site buildings, and recently participating in two Zoom meetings on the subject of the future utilization of the McLouth property, I feel a strong sense of urgency to again speak out and offer my advice on this subject.

This is a one time only chance to restore the property to its natural state. If we allow industrial development to proceed there, the site and the area around it will become just another crowded and noisy eyesore, and the resulting traffic congestion will ruin the quiet atmosphere along the river, and in the local communities.

There are only so many miles of natural and unspoiled riverfront left, and we do not need any more industrial structures built there. I have nothing against businesses or growth, but there are places where new factories and transportation hubs can be built, and would be welcomed, without them seriously and permanently disrupting residential neighborhoods.

Not only will restoring the McLouth site to a natural state help preserve the residential character of the area, but the resulting higher home values, which will be reflected in a higher value tax base, will help make up for, or even surpass, the taxes any industrial development could bring. The increase in the Quality of Life that will result, is, of course, priceless, and is worth collecting less tax revenue in the long run.

Crown has done a good job so far of removing the old structures from the property, and they naturally deserve to be reimbursed for their efforts and expenses.

Our parks and other natural areas are an indispensable part of our national infrastructure, and we should seize this once in a lifetime opportunity to restore and preserve this unique and important part of riverfront property in our own front yards.

Therefore, I believe that we should contact Congresswoman Debbie Dingell, and have her work to use or add funding provisions within the proposed National Infrastructure bill to:

1. Fund acquisition of all property from Crown and any other holders, and assign all of that property to the International Wildlife Refuge. Since buyers are not exactly beating down the doors at Crown to purchase the site, it should be possible to negotiate a sales price that is fair to all parties, especially considering the environmental remediation that still needs to be done.
2. Continue EPA evaluation of the site, with the goal of restoring it to a natural state.

3. Continue necessary hazardous waste cleanup(s), and continue testing on a regular basis, to ensure that all man-made contaminants are removed.
4. Help maintain the resulting additional Refuge acreage.

Thank you for your time and consideration.

Fred Watson
Grosse Ile, MI
July 23, 2021

Original proposal:

My proposal for further expanding the Detroit River International Wildlife Refuge consists of two parts. The first allows for the utilization of the vacant **McLouth property**, in north Trenton, and the second concerns the now vacant **Solutia property**, in south Trenton.

I was originally going to suggest that the vacant **Riverside Hospital** property (in Trenton) also be added to the Wildlife Refuge area, with the building itself to be used as a visitor/administration and maintenance center. An expanded riverfront dock could have been added, for use by the Detroit Riverkeeper. However, this property has since been spoken for (once again).

My suggestion for the **McLouth property** is to acquire it, through donations or grants. The cost for the current owner to clean this area up and make it environmentally safe is very high, so it may even be possible to obtain the property at no cost, if waivers are granted for any future liabilities related to the site. The next step would be to level all of the remaining structures, except for the administration building, and turn all of the now available acreage into an additional area of the Wildlife Refuge, or a combination Refuge and public park.

This included park area would be similar to Lake Erie Metro Park, or Elizabeth Park, and its inclusion should reduce any public opposition to essentially returning the property to nature, as opposed to developing it as tax bases for the cities of Trenton and Riverview. A combination park and Refuge area of this size would provide a clean and natural recreation place for area residents.

After a thorough “brown field” cleanup (which may be eligible for Federal and/or State government funding, possibly under superfund status) of the property, and removal of the train tracks, along with their bridge crossing over West Jefferson Avenue, native flora and fauna could be re-established.

The existing McLouth administration building could be turned into a combination visitor center/Refuge maintenance and research center.

Along with the newer golf course along the river [in Wyandotte], adding the stretch of restored natural real estate that such a new Refuge area (which is situated right on the river), would represent would be very beneficial for native river wildlife, particularly migrating wildfowl (by providing natural extensions of flyways, along the river).

The cleaning up of the McLouth site would also go a long way toward sprucing up the areas of north Trenton and south Riverview, and perhaps provide additional or new business opportunities for anyone who wanted to provide services to visitors to the new Refuge/park. For instance, Sibley Gardens could increase their business by serving meals to visitors, before or after they had spent a few hours at the area.

The **business property just south of the McLouth property** could also be acquired, if a suitable price could be negotiated with the current owner, and added to the McLouth parcel (and then, the Refuge). This site appears to be currently underutilized, and the owner may want to sell it to eliminate the tax burden it represents. This site may extend from the river to West Jefferson, making it ideal for use as part of the Refuge.

The **Solutia property** (which is currently for sale, and probably at a very reduced price), on the east side of West Jefferson, could be acquired (through donations or grants, if necessary), cleaned up, and made part of the adjacent Refuge site, with the Solutia administration building(s) being re-purposed as a visitor center/administration and maintenance center, as mentioned in the McLouth section of this proposal.

As is the case with the McLouth property, Solutia may even donate the property, since the expense of periodically pumping out the chemical drainage ponds on the site, and doing a full environmental cleanup, are present and future burdens to the company. Waivers for any future liabilities associated with the site could be a deal maker here, as well.

I feel that this is the right, and best, use for both of these riverfront properties. There is plenty of room for business expansion in other parts of Trenton, including the previously mentioned west side of West Jefferson, across from the McLouth site; in currently vacant buildings in Trenton's Downtown and West Road areas; and in a few spots along the city's Fort Street corridor.

Trenton's (and Riverview's) few remaining riverfront areas should be set aside and preserved for natural use, and not turned into more over-developed strips of businesses and high-priced condominiums. This would help to maintain the pleasant character of the two riverfront cities, and help prevent them from becoming overbuilt and overcrowded.

Once these areas become part of the Wildlife Refuge, they would be permanently off-limits to any commercial development. In addition, they would present a much more attractive view to boaters on the Detroit River, and to the residents of Trenton, Grosse Ile and Riverview.

Thank you for your time and consideration.

Fred Watson

Flat Rock, MI

July 12, 2012