

McLouth Steel Superfund Site Community Advisory Group
June 11, 2020
Meeting Summary

The May meeting of the McLouth Steel Superfund CAG took place online as a Zoom webinar on June 11, 2020. The purposes of that meeting included:

- Providing an overview of EPA's Risk Assessment process
- Providing an overview of EGLE's approach and timeline for the Northern property
- Clarifying and addressing CAG questions about EGLE oversight

The Following primary CAG members were present:

Jim Wagner, City of Trenton; Russell Bodrie, Grosse Ile Township; Brian Webb, Riverview Brownfield Authority; Wendy Pate, Trenton Visionaries; Doug Thiel, Nature and Land Conservancy; Greg Karmazin, Grosse Ile Civic Association; Robert Burns, Friends of the Detroit River; Paul Frost, DownRiver Waterfront Conservancy, Robert Johnson, Abutters; and the following At-Large Community Representatives: Larry Ladomer; Judith Maiga; Emily Hornbeck; Dennis O'Brien; Ryan Stewart, and; Edie Traster

Decisions Reached

- The May meeting summary was approved by the CAG without any further revisions.
- The recordings for the last three CAG meetings have been posted on Youtube on this playlist: <https://bit.ly/3dPYdHX>
- Below are the links to the specific CAG recordings for April, May, and June:
 - April - <https://bit.ly/3dF2QEB>
 - May - <https://bit.ly/3dHRz6u>
 - June - <https://bit.ly/2BiR05G>

Action Items

- EPA to post all meeting materials, including the (updated) slides presented, on the CAG website (www.epa.gov/superfund/mclouth-steel).
- Future topics for discussion: the meaning and applications of state and federal clean-up standards; different kinds of risk assessments that can be done at a site.

Summary of Discussions

CBI (Consensus Building Institute) facilitator Stacie Smith welcomed everyone and explained the features of using the Zoom webinar interface for all on-line members and attendees from the public and reviewed the agenda and meeting ground rules. Stacie then introduced the speakers for the first part of the meeting. Speakers included: Keith Fusinski of USEPA, and Jacob Runge and Jeff Benya of EGLE. Slides used by the presenters can be found on the project website: www.epa.gov/superfund/mclouth-steel

EPA Risk Assessment Process

Keith Fusinski, Epidemiologist at USEPA gave a presentation explaining risk assessments.

Risk assessments involve a comprehensive study of the ways in which people and other living things might be in contact with chemicals and the likelihood of these chemicals to cause adverse health effects. A risk assessment is grounded in the present and future risk, and it is not an examination of already-existing health conditions of humans and other living things or the likelihood of these conditions having been caused by chemicals present at a site. Risk is calculated by multiplying the toxicity of a chemical (its ability to cause adverse health effects) by organisms' exposure to this chemical.

The Risk Assessment Paradigm involves four different steps:

- Data collection and evaluation
 - Involves collecting data about the history and characteristics of the site as well as how living things (including human beings) can come into contact with the contamination.
 - A sampling plan is created to identify what chemicals are present and where and how to identify all exposure areas and pathways. A sampling plan also involves background work to determine whether chemicals found on and around the site are naturally-occurring in the specific environment or whether they can be attributed to another source.
- Toxicity assessment
 - Toxicity assessments evaluate the toxicity of the chemicals found on the site by looking at existing research and determining whether there are any adverse health effects associated with the chemicals, what these effects might be, and at what concentrations chemicals begin negatively affecting people and other living things.
 - When the EPA looks at the available research on a chemical, they will always base their conclusions on the lowest concentration at which the chemical was found to cause negative effects.
 - If a chemical is found to have a negative health effect that is not cancerous, risk threshold is based on the estimate of the daily exposure levels that humans can withstand without a detrimental health effect.
 - If a chemical is known to cause cancer, risk is estimated by its probability to cause cancer over a 70-year lifetime.
- Exposure assessment
 - An exposure assessment examines the ways that living things (including humans) could come into contact with chemicals on a site.
 - In addition to looking at exposure pathways, exposure assessments also look at characteristics of the environment where the site is located that affect exposure (e.g., climate, soil, water).
 - Exposures are divided into two categories of assessment:
 - Residential, which examines exposure for 24 hours a day, for 350 days per year, for 26 years.
 - Commercial, which examines exposure for eight hours a day, for 250 days a year, for 25 years.
- Risk characterization is the last step:
 - It adds the information gathered from the previous steps together to determine the potential for adverse effects to occur from exposure to a contaminant and the evaluation of the uncertainty involved.

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

- How does EPA's assessment of the site regard dust? Is MSC required to remediate the hazards caused by toxic dust at the site?
 - *There are dust monitors at the perimeter of the site to examine the dust, and the agreement with MSC requires them to control dust on the site.*
 - *The risk assessment process will include examination of the dust. Additionally, the risk assessment looks at inhalation, which includes dust, as a potential pathway for toxic chemicals, and at the concentration of toxic elements in the dust.*
 - *As EPA completes its risk assessment and collects samples, we can make decisions about remediations in the site that address dust.*

- Could you clarify when during the sale process it was decided that the prospective buyer should only clean the site up to industrial standards? Is the site subject to EGLE's nonresidential standard?
 - *MSC's agreement with the county is to use the site for an industrial development, but the agreement specifies specific clean-up activities, rather than requiring remediation to any specific standards. Under their agreement with the County and with EPA, they agreed to take down the buildings, clean up pits and lagoons, and protect or eliminate exposure. They are responsible for ensuring that existing site conditions are not exacerbated, and that the site is able to be safely redeveloped. Everything else will be addressed under the NPL listing.*
- I am concerned about Manganese found on the property, given that the chemical fights the body for absorption of iron, and has the potential to impact the development of children and cause conditions like Parkinson's in older adults. What is EPA doing in addition to monitoring to protect the public from Manganese?
 - *Humans must be in direct contact with Manganese to feel its effects. My understanding is that the Manganese found at the property was ten feet deep into the soil, not at the surface. Nonetheless, once full risk assessment is completed, EPA remedies can cap the spots where manganese levels exceed exposure levels, or remove the manganese.*
- What will happen once EPA leaves the site and the dust monitors are taken off the site?
 - *MSC and their contractors have worked on the dust issue, by, for example, stopping work once wind speeds exceed ten miles per hour. We have our own contractors visit the site and document what is happening there. But the issue of the dust will need to be remediated more holistically during the next phase of clean-up. The risk assessment process will help identify contaminants at the site and their mechanisms for exposure. For example, we would need to have a covenant in place to ensure any that caps are installed correctly and EPA can inspect it. The owners themselves may put some concrete cover on the site. As we go forward, these are helpful areas for the CAG to be involved - please continue bringing this up and staying informed on it.*
- What about the groundwater?
 - *Groundwater has not yet been investigated – this will happen as part of the risk assessment process. A Stormwater runoff study needs to be done at the site.*
- I am concerned about the aesthetics of this site. What powers does this CAG have to influence the choice of aesthetically pleasant remedies?
 - *Once remedies are proposed, there will be a public-comment period where people will be invited to share their opinions, concerns, and desires.*

EGLE Oversight and Process

Jacob Runge from EGLE gave a presentation on the EGLE's Corrective Action process, which governs clean-up on the Northern portion of the site.

The northern part of the McLouth property was bought by the Riverview Trenton Railroad Company (RTRR) around 2000. This property is currently undergoing Michigan's Corrective Action process.

The Corrective Action Clean-up Process is a results-fueled approach that involves the assessment of a site's contamination, determines the best actions for remedying the site, and the implementation of that action. Michigan's Corrective Action process is flexible and is driven by the conditions at the site being evaluated. There are five evaluation criteria for making clean-up decisions:

- Initial site assessment: Typically called an RFA, this step encompasses research about the conditions present at the site and determines whether a cleanup is needed and identifies areas of concern. The RTRR property went through an initial site assessment while under the ownership of DSC in 1989.
- Site characterization: Evaluates the nature and extent of contamination of a site before a cleanup decision can be reached.
- Interim actions: To address urgent issues that needs to be addressed immediately.
- Evaluation of Remedial Activities: Looks at alternatives and selects the most appropriate.
- Remedy Implementation

The State and DSC agreed to a Corrective Action Consent Order (CACO) in 1999. This CACO was an agreement between the owners of the property and EGLE to respond to environmental obligations. A new CACO was more recently signed between RTRR and EGLE and outlines the ways that MI's Corrective Action will be done.

Currently, the RTRR property is in Phase 1 of the Corrective Action work.

- Everything that needs to be done in this initial phase needs to be completed by April 12, 2021. So far, the following steps have occurred:
 - 12 groundwater monitoring machines have been installed
 - Sampling events started in December of 2019 and take place quarterly
 - Two of five waste management units have been implemented
 - A plan for dust control has been generated
 - Groundwater data is being collected by RTRR, and will be shared in a report that will be published at the end of Phase I

Phase II will involve any corrective action necessary to remedy the site that is not currently defined in the initial scope of work. Before choosing a cleanup approach, regulators and other expert staff analyze a range of potential remedies and their advantages and disadvantages relative to the site in question. The implementation of a remedy involves detailed design instruction regarding operation and maintenance.

There are two kinds of remedies that can be used on a site: institutional controls, and engineered.

- Institutional controls are administrative and legal, and minimize the potential for human exposure to the site by limiting and regulating human access. Zoning, restrictive covenants, and making a property commercial or industrial in perpetuity are examples of institutional controls.
- Engineered controls involve the use of physical barriers, like a concrete tap, to reduce access. These controls can also be more complex, depending on what is necessary on the stie.

Similar to the EPA Superfund process, future use guides remediation options. This parcel remains licensed for commercial use only. Corrective action programs done by EGLE have established administrative and engineered controls.

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

- Will RTRR be required to move the debris that has been left there over the years?
 - *The debris pile will not be left there unexposed at the end of this process. The piles are one of the main sources of dust.*
- There is a gathering of water in the bend around the blue moon that has an odd color and is outside of normal pH, could you please speak on this?

- *That water has not been tested for heavy metals yet, but a simple pH test showed that the water was at a normal pH of 7.1-7.2. There are two drains and it is unclear why they're blocked, but they will need to be addressed by Wayne County when the road is repaired, which is a planned project.*
- Did Riverview rezone the site for mixed use?
 - *No, the site is still zoned for Industrial use.*

History of EGLE involvement in MSC Site

Jeffrey Benya of EGLE presented an overview and update of EGLE's oversight of the MSC clean-up.

In November 2018, representatives from EGLE's Air Quality Division (AQD) met with MSC and their subcontractors to discuss demolition plans. In January 2019, AQD conducted an inspection on the site that resulted in the recording of a violation for the treatment of galbestos coating and metal siding, both of which had been made viable during the demolition operations. MSC and their subcontractors then remediated that problem.

In March 2019, EGLE completed another inspection that found no violations. In November 2019, AQD inspected the demolition of one of the stoves on the site which resulted in another violation, which prompted MSC to stop operations on the stoves until they had a better plan to demolish them properly.

Most recently, in April of 2020, MSC submitted their demolition plans for the two stoves that remained at the site, which AQD will be inspecting. Currently there is no timeline for the demolitions of the remaining two stoves. Currently, 85% of the galbestos at the site has been cleaned and disposed of, and 95% of the known friable galbestos has also been removed.

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

- There are three large smokestacks in addition to the two stoves, are there special protocols for their demolition?
 - *The smokestacks were tested for asbestos and none was found, so they are likely going to go through a regular demolition process.*
- Does EGLE keep records of where materials like galbestos were disposed of?
 - *EGLE does not keep those records but we have access to them.*
 - *MSC has a list of approved disposal facilities.*
 - *At the end of the project, MSC will give EPA a report of where waste has been taken.*
- Is there any inspection done on the trucks that take away the waste to ensure that waste does not fall off and stay within residential areas?
 - *EGLE can only complete site inspections, so our ability to inspect the trucks carrying waste is limited to the times the trucks are present. However, EPA has its own contractors inspect the site periodically, for week-long periods and inspect all aspects of the site.*

Site Aesthetics

CAG Member Robert Johnson, an abutter and member of the Beautiful Trenton Commission, raised concerns about the issue of unattractive fencing, grass mowing practices, and debris from the site that negatively impact the aesthetics of the community. Other CAG members raised concerns about plans regarding trees on the perimeter of the site, on the Trenton side

and along the river. Brian Kelly of EPA noted that many of those details lay outside of the oversight role of EPA and EGLE, but that some of those might be part of the site plan that will need to be approved by the City of Trenton. He also suggested that the CAG might benefit from developing a constructive communication channel with MSC to raise and discuss topics like these going forward. Participants suggested it could be helpful to learn more about the zoning and site plan review process.

Next Steps:

Stacie Smith reminded the CAG that the next meeting would be July 9, from 6:30-8:30 pm. She noted that the Leadership Board would meet next week to identify agenda items for the July meeting. One priority was to invite a speaker from MSC to begin building that relationship between the company and the CAG. While MSC may not be ready to speak in detail about their future plans, they might be willing to introduce themselves and update the CAG on their cleanup.

The meeting adjourned.