

McLouth Steel Superfund Site Community Advisory Group
September 10, 2020
Final Meeting Summary

Meeting in Brief

The September meeting of the McLouth Steel Superfund CAG took place online as a Zoom webinar on September 10, 2020. The purposes of that meeting included:

- Providing an introduction to Groundwater (Groundwater 101)
- Sharing ongoing work and findings on sediment investigation and clean-up efforts in the Detroit River
- Opening the floor for CAG Work Planning and member updates, questions or concerns regarding the McLouth site
- Hearing public comment

Please see **Appendix A** for a list of primary CAG members who were present.

Decisions Reached

- The July meeting summary was approved and will be posted on the EPA’s CAG website; since CAG meeting schedule will shift to quarterly, there will now be due dates for providing input on the draft summaries, and time for review of the final summaries via email, after which time the summaries will be deemed as final and posted.
- 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.
- The next meeting will be in January 2021. [*Note: proposed date, January 14.*]
- The recordings for previous CAG meetings have been posted on YouTube here: <https://bit.ly/3dPYdHX>

Action Items

Responsibility	Item
CAG Members	<ul style="list-style-type: none"> • CAG members disseminate information about Iron Oxide (orange) smoke on the McLouth site to the community
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/or EGLE send Stacie Smith (CBI) information about Iron Oxide (orange) smoke seen by residents to be distributed to CAG members and broader community
CBI	<ul style="list-style-type: none"> • Produce September meeting summary • Seek and clarify timing on the groundwater investigation at McLouth Steel site

Future Topics for Discussion

- Air Quality 101: Investigations, Monitoring, and Procedure
- Overview of range of remedial actions

Updates on the site:

Stacie Smith welcomed a new CAG member: Robert Howey, Brownfield Representative for City of Trenton.

Brian Kelly provided a brief update on the work happening at the McLouth Site. He noted that things seemed as if they were going fairly slowly because MSC is dealing with the hard issues of pumping out the basement, busting out the top floor (“the Penthouse), which is reinforced concrete, as well as having to clean out transformers. He noted that they had removed almost all the scrap metal, will be keeping the brick building along the shoreline, and have now removed the different pumps.

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.

Groundwater 101

Mellisa Powers-Taylor (EGLE) and Nathan Erber (EGLE), gave brief presentations to orient the CAG to topics related to groundwater contamination relevant to the McLouth site, and to provide context and background for conversation around contaminated sediments in the Detroit River. Ms. Powers-Taylor provided the CAG with general information about site hydrology and geology. Mr. Erber then followed with a presentation on “How Groundwater Works.” He reviewed how groundwater fits into the larger water cycle, describing where groundwater comes from and how it moves (an overview diagram of the water cycle can be [found here](#)). He also introduced the components of groundwater investigations covering monitoring wells, mapping flow direction and speed, and highlighting information that might be seen in an investigation reports and how to understand them.

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

- **Have the products that were going into the groundwater until they took them out gone now? What is left of what was moved away from the barrel, etc.?**
 - *EPA: There are still a considerable number of contaminants under the site, and when the remedial program does their investigation, we will have more complete information. We did remove quite a bit but I would not say that everything has been removed.*
- **How long will the groundwater investigation take at McLouth Steel, do we know this yet?**
 - *EPA: EGLE’s investigation took 1.5 years, but we will defer to Nabil on the exact timing.*

- **Do we know if the water flows to the river or from the river?**
 - EPA: *EGLE's investigations to date suggest that it flows towards the river. We need to understand why, how fast, where is it going. A lot of these questions are unanswered. EGLE's report says groundwater is moving towards the river and the plume is expanding, but it does not seem to have reached the river, and we don't know why it hasn't made it yet.*
- **I am concerned that contaminants could move down the river through the limestone and go on from there to create problems. Will the investigation look beyond the immediate site if there is reason to believe that contaminants are flowing into the river?**
 - EPA: *That's correct. A superfund site includes wherever the contamination goes. When EPA does their remedial investigation, they look wherever it has gone. You can see in the expanded site investigation report that they went out into the river and took samples. McLouth used to just dump their waste into the Detroit River and a lot of the greases and sludges sank and eddied in the black lagoon. Part of the groundwater investigation is to look down and see what is in the water at different screening levels. This is why it will take a long time, because there is so much information to be gathered and has to be at a certain data quality, so they have high confidence in the data they are getting and putting into the models.*
 - EGLE: *It appears that there is a wide layer of clay on top of the limestone, so depending on how pure the clay is and whether it has a lot of sand, it is extremely hard for groundwater to move through clay. It can take on the order of 10,000 - 100,000 year for groundwater to move through clay, as long as the clay is solid and not fractured (i.e. nothing causing breaks in the clay). Clay can serve as a protective barrier ("aquitard" to protect the bedrock).*
- **Do we know at what depth the saturated zone is on the site?**
 - EPA: *I do not know. This will be part of the investigations to come.*

Sediments, Investigation, and Remediation in the Detroit River

Rose Ellison (Great Lakes National Program Office (GLNPO, EPA) and Sam Noffke (EGLE) presented on sediments and investigations in the Detroit River. Ms. Ellison provided the CAG with a review of the initiatives engaging in sampling and site characterization of the Detroit River's sediments, and its historic outfalls, noting that most of the contamination being found in the River comes from legacy industrial and municipal activities. She also provided a layout of the investigation and remediation projects happening along the McLouth Shoreline, in particular work being done on Monguagon Creek, explaining that due to the 2002 Great Lakes Legacy Act, that there were several different authorities managing projects along the river. She noted that the investigation and remediation of sediments in the river at the McLouth site are included as part of the Superfund designation. Mr. Noffke provided a review for the CAG of the RFP proposals that were out to professional contractors to investigate the nature of contaminants along the northern section of the McLouth Shoreline. He noted that these RFPs were asking specifically for a site characterization that included several key parameters (e.g. bulk sediment, surficial & cores, porewater, etc.). Following these details, Mr. Noffke detailed the project schedule and RFP process underscoring that sampling work would likely begin in

Spring 2021 with the hopes of concluding the projects within a couple of years to then hand over a completed remedial investigation with a defined responsible part and study.

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

- **Will the Monguagon creek remediation improve the water flow near Jefferson? This area tends to flood.**
 - *GLNPO: Probably not. We will not be dredging Monguagon Creek – haven't done the design, but the goal is not flood mitigation. If we dredge AOIC, there will be some increased water flow. This would only happen as a result of dredging, but it will be focused on remediating the sediment.*
 - *EPA: The flooding is caused by drainage issues with the road, which will be addressed when the road is redone.*
- **At what time and whose responsibility is it to stabilize the shoreline?**
 - *EGLE: As far as the shoreline goes, to the extent that the stability of the shoreline would be dictated by future use of the site. If needed for dredging, we would do some stabilization, but we are not sure if it is needed. However, we have had another project where shoreline stabilization was a major element of the project. It is an important element but is only looked at to the extent it is relevant.*
- **If a proposed use was a deep-water port, would the proponent be required to stabilize the shore?**
 - *EGLE: This is something that would need to be looked at when addressing the nature of the sediments. Dredging isn't always the solution, but if needed, the shoreline would be stabilized for this to be done. We cannot predict anything, but there will be an assessment of remediation analysis for design.*
- **How does a technical assistance grant play into this?**
 - *EPA: The technical assistance grant is designed to provide an advisor to help the community understand technical documents associated with the Superfund site.*
- **What are some examples of ways that contaminated ground water runoff is remediated? You mentioned dredging – can you explain how dredging helps the process, and what other mitigation methods exist? If this is too big a topic, perhaps we can follow up in the next meeting?**
 - *GLNPO: There are two kinds of dredging: mechanical and suction. Mechanical dredging uses remote sensing to see what we're doing under water. Suction is like a big vacuum and much slower. Capping is another method, which involves technology and chemical isolation layers, and this is another form of sediment remediation. There is monitoring and natural recovery, where thin cap is put on the area, this is meant as a short-term thing to keep sediments in place while things move around it. Dredging and capping are the main strategies used.*
 - *EGLE: It is important to note there is a difference between impact on water quality and impact on sediment. Contamination of the sediments took decades to do, and was caused by the huge level of contaminants going straight into the river. Since the passing of the Clean Water Act, there will never be anything like what caused this legacy contamination. The flow of the river prevents surface water contamination. While contaminated groundwater shouldn't be dismissed*

as a potential source of on-going contamination, the impacts would be small due to the significant flow of the river (200 ft³/second).

- **Won't dredging the shoreline draw more of the groundwater into the river?**
 - *EGLE: We're looking at the top of ground water sediments and deeper. This is something that will be assessed, but in general it is not the case that the water table would be above the surface elevation of the sediments.*

On the cleanup of the sediments of the shoreline, is there a standard to which this would be done that is comparable to what is being done on the land itself (e.g., a difference between industrial/non-industrial cleanup standards.) How could the affect the reuse of these areas.

- *GLNPO: Cleanup standards for sediments are very difficult – there are not set standards, our screening criteria are based on a paper written a number of years ago. However, the numbers that we are concerned about in the sediments are orders of magnitude below the criteria on the upland. There are many different techniques and all projects are different to determine the cleanup standards on each site. For the Monguagon Creek site, we adapted cleanup standards to meet the screening criteria. There are no regulatory criteria, it is just what the industry has adopted as the standard. Superfund has different ways of doing it, and usually bases around the impact to aquatic biota and organisms (extremely conservative to anything used in the upland). The screening criteria are the most conservative you can go.*
- **It seems like it will take years to study some of these issues and the current owner is going to want to move forward with their redevelopment. This could involve covering large areas of the site with storage areas or impervious surfaces that could limit testing of groundwater. Is there a concern about the redevelopment affecting the areas that might be covered and monitor and determine the conditions of the ground water?**
 - *GLNPO: The picture I showed at the end with questions illustrates that this project came about because the Detroit Riverfront Conservancy applied for a permit to put riprap on the River Walk. During the review, we discovered there were contaminated sediments and as a result ended up putting a cap in that area with the riprap on top. This is the same thing that would happen if current users wanted to put a substrate. [The property owners] would not be able to just drop rock without at least evaluating contaminated sediments. They would have to look at the sediment part of this and there is precedent to do so. We have excellent contractors, and they put in monitors to look at potential infiltration. They have a lot of experience and there are ways, so if a cap was called for, then this would be part of the evaluation to look at groundwater infiltration. It doesn't matter what the area upland is zoned for, we will look at what is most protective for the aquatic organisms.*

CAG Work Planning and Member Updates, Questions or Concerns Regarding the McLouth Site

The facilitator opened the floor for members to share any questions, concerns, or updates. CAG members offered the following comments and questions regarding the McLouth Site (*answers in italics*).

- **Over the past couple of weeks there have been large clouds of orange smoke coming from the site. Can you go into detail about what the process is that's creating the orange smoke, how the negative impacts are being mitigated, and any context about what potential impacts could be?**
 - *EPA: They are cutting steel, an EGLE inspector went out to investigate and concluded that this is coming to an end, but there may be some additional steel left to cut.*
 - *EGLE: If you feel like you are affected, please go to the digital air quality complaint form here: <https://www.eGLE.state.mi.us/ERS/Survey/14>; After hours, you may call the Pollution Emergency Alerting System (PEAS) hotline at 800-292-4706; your information will remain anonymous outside of the EGLE responders using this system.*
- **How does the CAG communicate to residents to alleviate concerns, or let them know their concerns are being addressed when things like this happen? Is there an avenue of communication, should CROWN release a statement in advance, so this doesn't continue to happen?**
 - *CBI: Perhaps the CAG can serve as a helpful vehicle. If people are asking questions and want to get the info out to the public, and this a role that the CAG can play.*
 - *EPA: If the CAG facilitator (Stacie Smith) is the single contact with the CAG and can pass the information through you, this may be a good way to do this.*
- **Going forward with reports, and all of these things, how do we distribute/disseminate information, etc.?**
 - *CBI: We could use the CAG email list as a way to get information out. We may want to think about some medium that is moderated officially by the CAG. For now, CBI can serve as this conduit of information. Regarding the orange smoke, EPA/EGLE can send a statement to CBI to distribute to the CAG.*
- **Why would clean up activities be held to a different standard than industrial emissions? I am also concerned that it was left up to MSC to monitor, I thought it would be EPA's ability to monitor the smoke. This should be monitored by someone other than who is doing the polluting.**
 - *EGLE: There is a differentiation in air quality regulations when the activities are caused by production or non-production. An EGLE inspector did go out and determine that it was not a production activity.*
 - *EPA: Our regulatory framework in the US is 99% self-monitoring. If you go to any industry, they are all doing self-monitoring/reporting. There are penalties for if*

they don't report the correct numbers, but it is almost all self-monitoring. That said, EGLE and EPA can, did, and will continue to monitor activities.

- **Could there be a process for notifying the public in advance, maybe by putting out a notice to the public with details about what is in the air and that it is not hazardous, just something to help mitigate concerns. [There is currently] no official source of information to alleviate concerns.**
 - *EPA: It would be great if the CAG can help to serve this process. MSC did notify EPA/EGLE before this started, and if we had a protocol earlier with CBI, we could avoid this.*
- **The public is concerned about what they see and their welfare, and also concerned with if what they are seeing is in accord with regulation. If there is opportunity to speak to both of these issues as often as possible, this does something to bring acceptance and calm. I can understand the difference between an ongoing process vs. temporary and that is in accord with law.**

Public Comment

- **I live in Trenton Towers, thank you this was very informative. I appreciate all the hard work and study that has gone into this. You are all in my prayers and I appreciate you.**

Wrap Up & Next Steps

In response to an inquiry submitted by a CAG member, CBI Facilitator Stacie Smith reviewed the CAG ground rules for interacting with the media. She noted that any CAG member posting on social media about deliberations of the CAG should be factual and should follow the CAG groundrules of being respectful and constructive. Finally, she reminded everyone of the CAG's purpose: to get things done, to learn, convey information, and to advocate for what is important in a constructive way.

CAG members then decided that the next quarterly meeting would be in January 2021. In the interim, if anything arose in between the meetings, Stacie Smith encouraged CAG members to reach out. She also noted that the CAG could be called together if determined necessary by the Leadership Board, and also that she would serve as a conduit to get information out to the CAG and in turn the CAG could then pass any relevant information along to the community.

The meeting adjourned.

Appendix A. CAG Stakeholder Representatives in Attendance

Primary and Alternate CAG representatives present at September 10, 2020 meeting are listed below.

Representative	Affiliation
Jim Wagner	City of Trenton
Brian Webb	Riverview Brownfields Authority
Robert Howey	City of Trenton Brownfields
Wendy Pate Nicole Tank, alt	Trenton Visionaries
Doug Thiel Paul Gloor, alt	Gross Ile Nature and Land Conservancy
Greg Karmazin Bill Heil, alt	Gross Ile Civic Association
Robert Burns Mary Bohling, alt	Friends of the Detroit River
Paul Frost	DownRiver Waterfront Conservancy
Robert V Johnson	Abutters
Emily Hornbeck	At-large Community Representative
Ryan Stewart	At-large Community Representative
Larry Ladomer	At-large Community Representative
Edie Traster	At-large Community Representative
Bryan McMurrin	Liaison for Rep Debbie Dingell's Office (Trenton)