



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



PHILLIP D. ROOS
DIRECTOR

July 28, 2023

VIA EMAIL

Mark Fletcher, Director of Environment Compliance
Crown Enterprises, LLC
12225 Stephens Road
Warren, Michigan 48089 USA

Dear Mark Fletcher:

SUBJECT: Approval with Modifications: *Work Plan: Area of Interest Interim Measures; Riverview Trenton Railroad Company (RTRR); Corrective Action Consent Order WMRPD No 111-06-2018 (CACO); MIK 420 024 889; Waste Data System Number 497352*

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD) has reviewed the "*Work Plan; Area of Interest Interim Measures; Riverview-Trenton Railroad Company; Former McLouth Steel Site; 18251 West Jefferson Avenue, Riverview, Michigan*" (IM Work Plan) submitted on June 29, 2023. The IM Work Plan was prepared in response to the May 2, 2023, letter issued by EGLE, MMD entitled "*Inspections of Riverview Trenton Railroad Company (RTRR); identification of New Area of Interest; Interim Measures Required Pursuant to Corrective Action Consent Order WMRPD No. 111-06-2018 (CACO); MIK 420 024 889; Waste Data System Number 497352*" (EGLE Letter). Pursuant to Paragraphs 6.3 and 6.5 of the CACO, the IM Work Plan is approved with the following modifications required to be made prior to implementation as detailed below:

Modification 1 – Address and submit to EGLE, MMD a revised IM Work Plan that responds to, "The IM Work Plan must also propose actions to immediately prevent the discharge of impacted groundwater into Huntington Creek..." as requested in the EGLE Letter. This modification is necessary to prevent future releases to Huntington Creek.

Modification 2 – The proposed soil boring and monitoring well locations have been moved by EGLE, MMD, as shown on the enclosed figure. In an effort to potentially save time and money during the investigation, EGLE, MMD suggests that some or all of the five wells associated with the 2010 United States Environmental Protection Agency (U.S. EPA) trench wall installation (enclosed) be found, assessed, and incorporated. A recent photo of the western-most groundwater monitoring well exposed in the excavation area (enclosed) indicates that the other monitoring wells are likely intact. For more information and assistance on this modification please contact Marc Messina, Geologist, Technical Support Unit, Hazardous Waste Section, MMD, at MessinaM@Michigan.gov or 517-219-2394.

Modification 3 – Investigate and evaluate utility corridors in the vicinity of the study area for the potential presence and migration of impacted groundwater.

Modification 4 – Maintain and restore all interim measures implemented to prevent public access to and contact with impacted surface water, and to prevent the impacted surface water from migrating offsite from the facility. RTRR must restore any controls that were in place prior to the railroad extension project (e.g., the clay dike wall, low permeability soils at the curbing that was in place to prevent the release of the high pH water from leaving the site, etc.).

Pursuant to Paragraph 6.5 of the CACO, EGLE is approving the IM Work Plan with modifications to expedite the implementation of interim measures. RTRR must proceed immediately with the measures proposed in the IM Work Plan, as modified above. Following implementation RTRR will submit to EGLE for review and approval the Investigation Report in accordance with the schedule in the IM Work Plan. EGLE will work with RTRR to incorporate this area of the site and the source material into the site-wide corrective action program and forthcoming Phase II Corrective Action Consent Order.

Please submit to EGLE, MMD, a revised IM Work Plan that addresses these modifications within twenty (20) days from the date of this letter. As stated above, it is expected that RTRR will begin the activities specified in the IM Work Plan and required modifications concurrently with preparation of the revised IM Work Plan.

If you have any questions regarding this communication, please contact me at ConfortiR@Michigan.gov; or 517-275-1649, or Elizabeth Garver, Enforcement Specialist, Enforcement Section, MMD, at 248-417-4135; or GarverE2@Michigan.gov.

Sincerely,

Daniel P. Dailey

for:

Richard Conforti, Supervisor
Engineering and Program Support Unit
Hazardous Waste Section
Materials Management Division
517-275-1649

Enclosures

Mark Fletcher
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cc: Todd Goss, Vice President, Crown Enterprises, LLC
Cheryl Jordan, Legal Director, Crown Enterprises, LLC
Tom Wackerman, President, ASTI Environmental, LLC
Brian Kelly, U.S. EPA, Region 5
Elizabeth M. Browne, EGLE
Tracy Kecskemeti, EGLE
Alexandra Clark, EGLE
Kimberly M Tyson, EGLE
Dale Bridgford, EGLE
Mary Carnagie, EGLE
Elizabeth Garver, EGLE
Oonagh McKenna, EGLE
Marc Messina, EGLE
Art Ostaszewski, EGLE
Corrective Action File



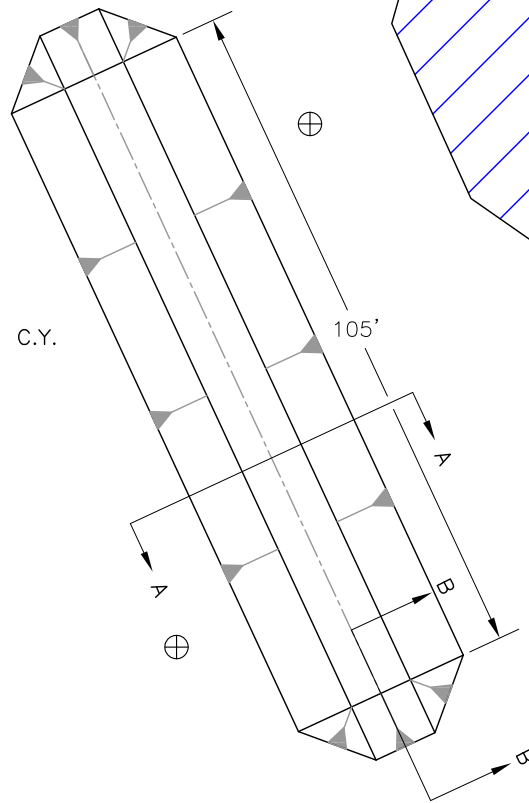
1 inch equals 50 feet



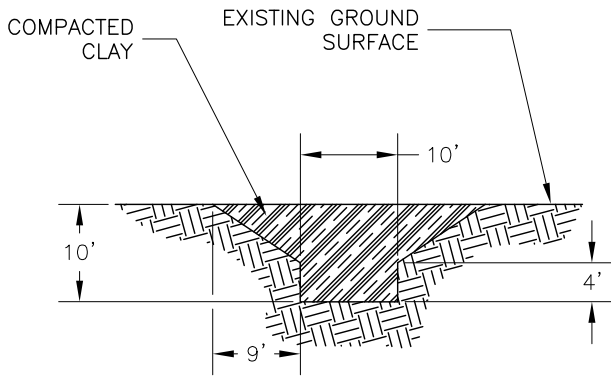
FIGURE 1
PROPOSED SEMI-PERMEABLE
WALL LOCATION
RIVERVIEW TRENTON RR SITE

LATA-KEMRON REMEDIATION, LLC

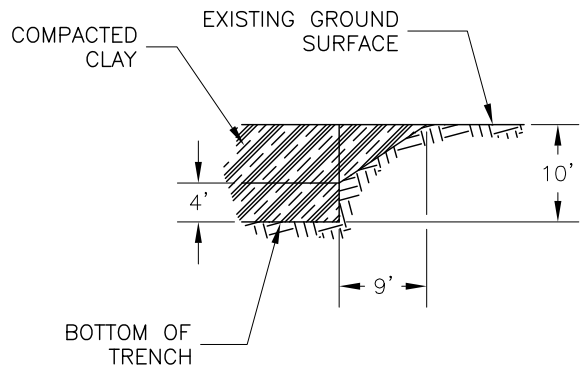
IN-PLACE VOLUME: 631 C.Y.



- NOTES:
1. COMPACT 8" LIFTS TO 95% STANDARD PROCTOR.
 2. OPTIMUM MOISTURE CONTENT IS 12%. NATURAL MOISTURE CONTENT IS 22%. MATERIAL WILL NEED TO BE AERATED/SCARIFIED PRIOR TO PLACEMENT TO DRY.
 3. (3) 4" UP GRADIENT WELLS.
 4. (2) 2" DOWN GRADIENT WELLS.



A-A



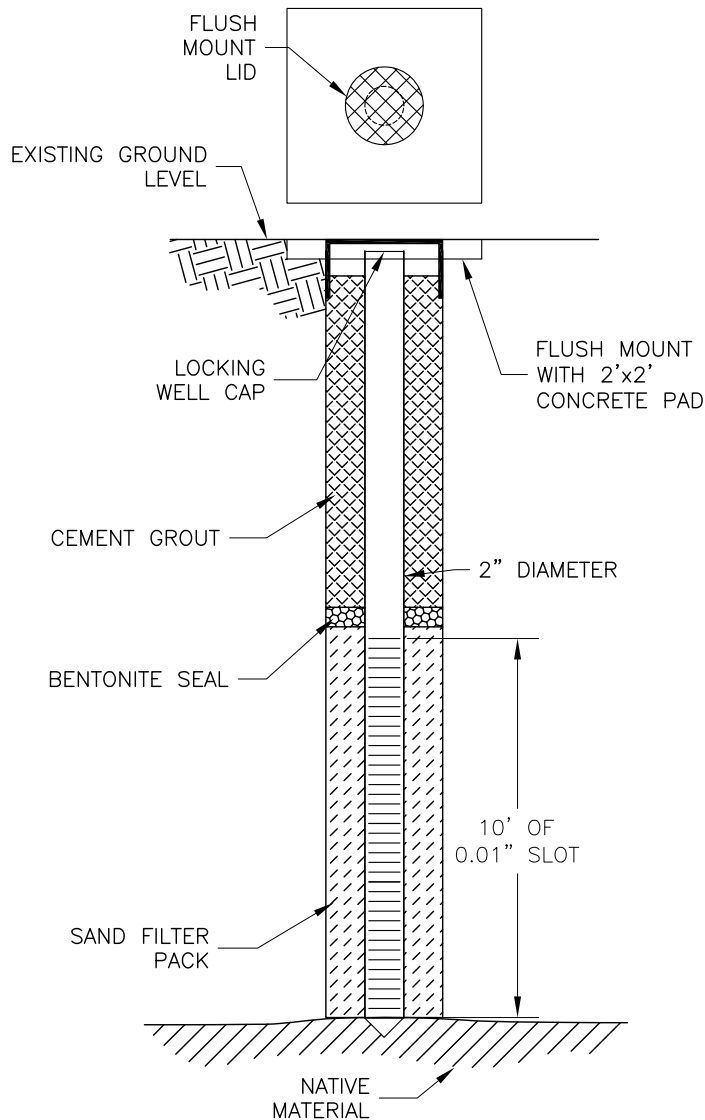
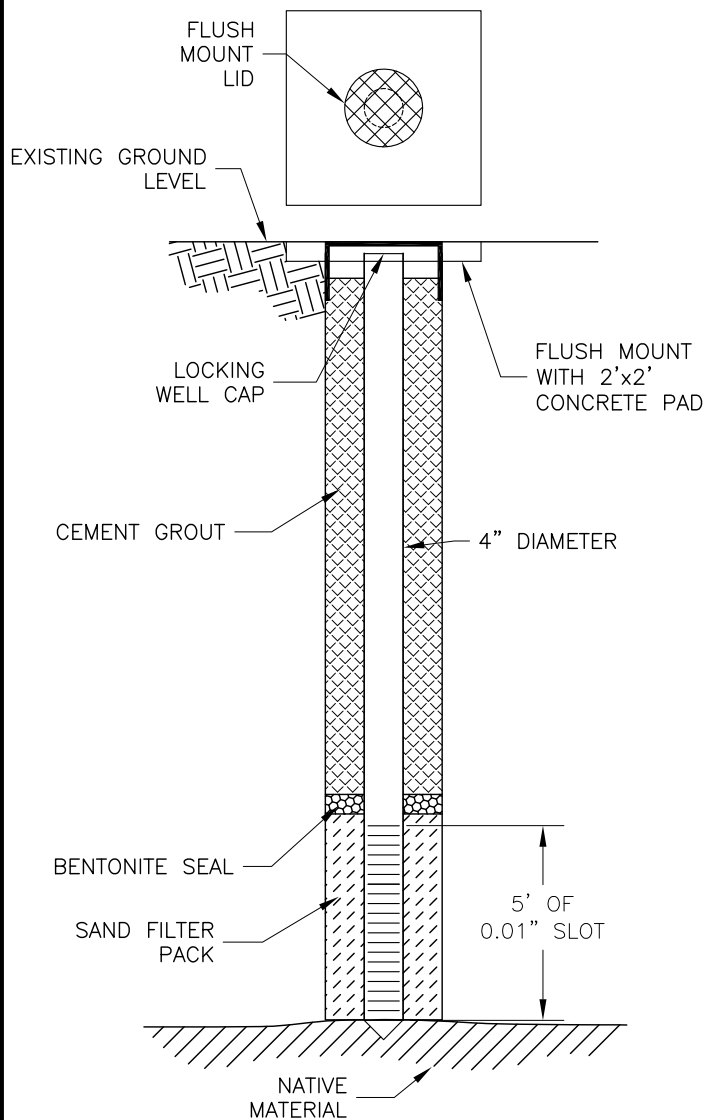
B-B



DRAWING NOT TO SCALE

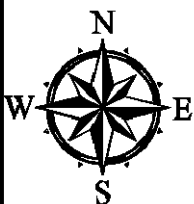
FIGURE 2
PROPOSED SEMI-PERMEABLE
WALL DESIGN
RIVERVIEW TRENTON RR SITE

LATA-KEMRON REMEDIATION, LLC



4" WELL CONSTRUCTION DIAGRAM

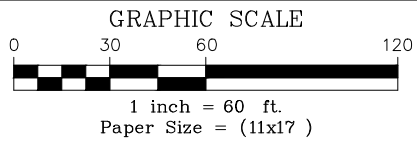
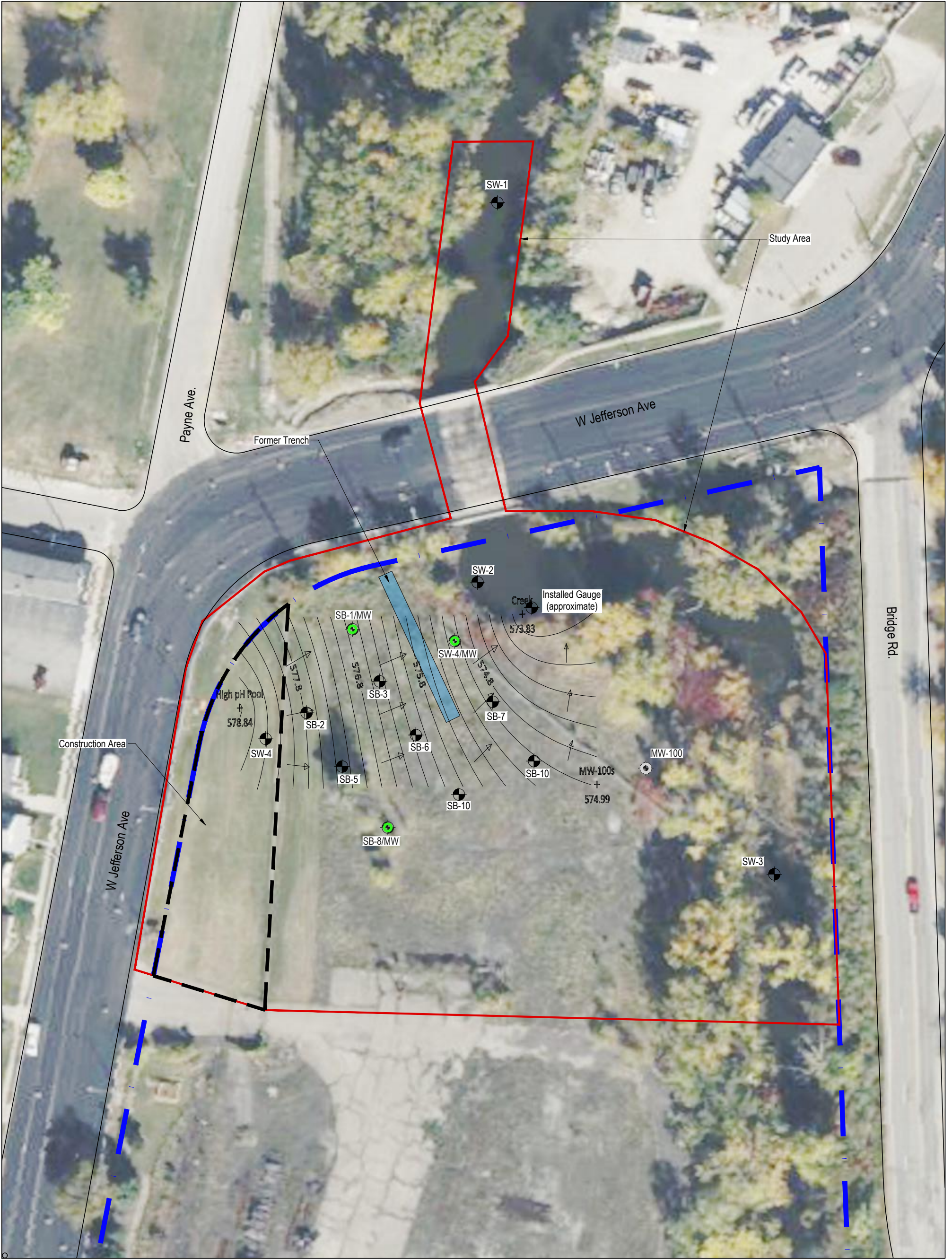
2" WELL CONSTRUCTION DIAGRAM



DRAWING NOT TO SCALE

FIGURE 3
WELL CONSTRUCTION DIAGRAM
RIVERVIEW TRENTON RR SITE
LATA-KEMRON REMEDIATION, LLC





LEGEND

- Property Line
- Existing Monitoring Well Location
- Proposed Soil Boring Locations
- Proposed Soil Borings Locations with future Conversion to Monitoring Wells
- Trench Location
- Groundwater Flow Direction
- Study Area
- Construction Area





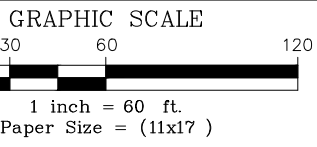
If the EPA trench wells are found, these MWs would likely not be necessary.

Move here (immediately inland from the seep location) and set a MW.

Move here

Move here

Soil borings and MWs



LEGEND	
	Property Line
	Existing Monitoring Well Location
	Proposed Soil Boring Locations
	Proposed Soil Borings Locations with future Conversion to Monitoring Wells
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	Study Area
	Construction Area

