

# McLouth Steel Superfund Site Community Advisory Group (CAG)

## TECHNICAL MEETING SUMMARY

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September 14, 2023 | Virtual Meeting No. 12

### Meeting in Brief

The September 14, 2023, meeting of the McLouth Steel Superfund CAG took place virtually via Zoom. The objectives of the meeting were to:

- Share updates on the remedial investigation & feasibility study (RI/FS) for the Superfund site; and
- Inform the CAG about recent issues related to the northern portion.

See **Appendix A** for a list of CAG members, alternates, and agency representatives who were present. Links to summaries, presentations, and recordings from this and previous CAG meetings can be found at the CAG website here: <https://mclouthsteelcag.org/resources-and-documents/>.

### ACTION ITEMS

Responsibility	Item
CAG members	<ul style="list-style-type: none"><li>● Provide feedback to improve the accuracy of this draft September Meeting Summary</li><li>● Disseminate final September Meeting Summary to constituents and community members</li></ul>
US EPA/EGLE	<ul style="list-style-type: none"><li>● Continue to share updates on RI/FS for the NPL site and high pH situation on the RTRR portion at future meetings</li></ul>
MDHHS	<ul style="list-style-type: none"><li>● Share updates on the Public Health Assessment when available</li></ul>
CBI	<ul style="list-style-type: none"><li>● Produce and distribute the draft September Meeting Summary, integrate CAG feedback, and share the final version for CAG dissemination and EPA posting</li><li>● Coordinate with Leadership Board on agenda for the next CAG meeting and internal CAG business</li></ul>

### Decisions reached & proposed topics for future discussion

#### Decisions reached

- The CAG nominated Joseph Porcarelli to represent Grosse Ile Township (and replace retired fire chief Russell Bodrie).
- CAG members and members of the public should send questions or concerns about cleanup or investigation activities at the McLouth site to EPA, EGLE, and/or Stacie Smith,

CAG facilitator ([stacie@cbi.org](mailto:stacie@cbi.org)). Information or responses will be sent to the CAG to disseminate to the public.

- The next meeting is scheduled for November 9, 2023.

#### Proposed topics for future discussion

- Review of the Public Health Assessment report from MDHHS
- Further updates on RI/FS and high pH situation (EPA & EGLE)
- Initial findings from the remedial investigation (EPA & CDM Smith)

## Summary of Discussions

Consensus Building Institute (CBI) facilitator, Stacie Smith, welcomed participants and reviewed the meeting agenda and ground rules. CAG members and representatives from agencies introduced themselves.

#### Updates on the NPL site (southern portion)

Greg Gehrig (US EPA Region 5) introduced Nilia Green who has taken over from him as EPA remedial project manager for the Superfund site. Mr. Gehrig has been promoted to section supervisor for EPA Region 5's Superfund Remedial Program.

Ernest Ashley (CDM Smith) provided an overview of updates related to the RI/FS for the Superfund site. He reminded the CAG that the purpose of the remedial investigation is to collect information on the nature and extent of contamination at the former steel facility. The goals are:

1. To provide sufficient detail to assess the risks posed to human health and the environment; and
2. To enable the evaluation of potential remedial alternatives in the feasibility study.

In terms of administration, the Superfund site is divided into 3 operable units (OUs), which are as follows:

- OU1 deals with source areas, such as releases to the land, fill material, and steel plant slag;
- OU2 comprises groundwater and involves the impacts of groundwater, its relation to the site's hydrogeology, and the discharge of groundwater; and
- OU3 concerns the Trenton Channel, focusing on groundwater discharge to surface water and the impacts on sediments and porewater.

Mr. Ashley then provided an overview of work completed to date under the RI/FS. EPA and CDM Smith have so far:

- Reviewed and compiled findings from prior investigations of the site;
- Conducted site reconnaissance and assessed existing monitoring wells;
- Carried out drone surveys;
- Conducted geophysical surveys and utility clearance activities;
- Begun soil boring, installing monitor wells, and developing wells (roughly 25 of 32 locations have been completed); and

- Chemically analyzed soil samples for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), dioxins/furans, and per- and polyfluoroalkyl substances (PFAS).

The investigation has yielded several preliminary findings. In terms of the site's history, the site is composed of extensive fill. Among the features present are made land, historic shorelines, and former wetlands and stream channels. Historic investigations of the site encountered oil, metals, PCBs, and high and low pH levels in groundwater.

Soil borings have revealed that the soils on the site are predominantly sandy and shallow. There is extensive native clay present above bedrock. The depth to bedrock ranges around 20 to 40 feet below ground surface.

Mr. Ashley also displayed a video of a drone flyover of the site.

Among the remaining investigation work to be completed for OU1 and OU2 are:

- Completing soil boring and soil sampling;
- Laboratory analysis of soil samples;
- Completing installation and development of monitoring wells;
- Groundwater sampling of newly installed and existing monitoring wells;
- Lab analysis of groundwater samples;
- Multiple rounds of water level elevation measurements;
- Hydraulic testing of monitoring wells;
- Assessment of hydrogeologic site characteristics; and
- Estimation of groundwater and contaminant mass discharge to Trenton Channel.

For OU3, remaining work includes:

- Marine surveys (multi-beam hydrographic, debris and shoreline, side scan sonar, and sub-bottom profile);
- Sediment sampling; and
- Surface water sampling.

The sediment sampling will take place in 23 locations, and will comprise surface samples (0-0.5 feet) along with core samples of several depths down to native clay or refusal. Geotechnical samples will also be collected at 6 locations, and sediment traps will be installed at 4 locations to assess mobile sediment. The surface samples will also be used for porewater analyses.

The surface water sampling will take place at 10 locations and is focused on assessing discharge locations and drainage areas.

Mr. Ashley closed by sharing a general timeline for the remainder of the RI/FS:

- Fall 2023 – Completion of Year 1 OU1/OU2 and OU3 field work;
- Winter 2024 – Evaluation of OU1/OU2/OU3 field and laboratory data;
- Spring/summer 2024 – Year 2 field work;
- Fall 2024 – Completion of remediation investigation and risk assessment;
- Spring 2025 – Preparation of feasibility study;

- Fall 2024 – Public participation on proposed cleanup plan; and
- October 2025 – Expected timeframe for Record of Decision.

**CAG members shared their appreciation for the update and offered the following comments and questions (*answers in italics*).** *[Note: some of these questions or comments were made during later parts of the agenda – they are documented here to promote clarity. Some answers have been expanded in order to ensure that all the member’s questions have been addressed.]*

- **Is the work under this timeline funded to enable the work to be completed on schedule?**
  - *EPA: The contract for the RI/FS is fully funded and the funds have been set aside.*

### Updates on the northern portion

Elizabeth Garver and Marc Messina (EGLE) provided updates on the investigations related to the high pH pit on the Northern/Riverview Trenton Railroad (RTRR) facility. They also highlighted that Oonagh McKenna is the new EGLE project manager for the RTRR and should be the primary point of contact on site-related matters.

In February, a CAG member notified EPA and EGLE about construction of a grade crossing on the northwest corner of the RTRR facility (near West Jefferson Avenue). EGLE’s Materials Management Division and Water Resources Division visited the site several times in March to sample and investigate a high pH pit in the construction area, along with a cloudy white feature in the nearby Monguagon Creek. As a response action, EGLE required the facility owner to prevent access and migration into the road. The owner completed installation of a fence and berm by March 24. EGLE also confirmed that the facility owner obtained permits to work in the roadway and reroute the railroad, and that they were not required to notify EGLE MMD of their activities.

In April, EGLE and the facility owner installed a camera to allow for daily observations of the creek so that EGLE can investigate the feature in the creek whenever it returns. These observations have not shown further impact on the creek.

In May, EGLE formally notified RTRR that EGLE would be adding the northwest area as a new “area of interest” under the 2018 Corrective Action Consent Order for the site. This would also require the facility owner to take interim measures to prevent further release. EGLE required RTRR to submit an interim measures work plan within 60 days. EGLE also gave an update at the May CAG meeting and heard concerns from the community about risks from human exposure and the process for response actions.

Ms. Garver clarified the mechanisms by which high pH discharge can be enforced in the state. Under Part 31, the state has Water Quality Standards which shall be met in all waters of the state. However, water associated with excavation does not qualify as “waters of the state”. OSHA’s standards outline that water with pH greater than 11.5 is assumed to be caustic, however this also depends on conditions like length of contact, nature of exposure, and others. Under the state’s hazardous waste regulations, EGLE can compel a facility to manage water with pH over 12.5 as hazardous waste. However, this pH has not yet been observed.

In June, EGLE engaged with MDHHS to discuss ways to evaluate the risks to human health. MDHHS subsequently set up a meeting with EGLE and the Wayne County Health Department. Meanwhile, EGLE received numerous media, legislative, and citizen inquiries. Construction moved into West Jefferson Avenue in mid-June. RTRR also submitted their Interim Response Work Plan at the end of June.

In July, RTRR continued construction alongside pumping of water to prevent offsite flow. EGLE, MDHHS, and the local health department also met to discuss appropriate protective measures. They agreed that pH and migration from the area should be monitored in real time during construction. However, after discussing with RTRR, EGLE learned that the construction was nearly complete. EGLE, the local health department, and MDHHS agreed on a response coordination and communication approach. If the pH exceeds 12.5, EGLE would require RTRR to manage the liquid as hazardous waste. In the event that the pH is greater than 10 and is leaving or likely to leave the site, EGLE would notify the local health department. At the end of July, EGLE also approved RTRR's work plan with modifications and required RTRR to submit a revised plan by August 16. EGLE also met with the CAG Leadership Board in July and committed to update the CAG at the September meeting.

In August, EGLE continued to monitor the site and received RTRR's revised work plan. However, in mid-August, EGLE observed a new high pH pit north of W Jefferson Avenue. RTRR was not certain that the liquid was coming from its facility but was willing to help address concerns. EGLE notified the local health department, who decided to place signage north of the road. EGLE also requested that RTRR conduct pumping onsite to reduce the volume of water accumulating north of the W Jefferson Avenue along the railroad tracks.

Theresa Brestovansky (Wayne County Health Department) informed the CAG that the signs arrived today and should be installed by the following Monday. CAG members advised that signs should go near the storm drain and near the new puddle on the north side.

In terms of upcoming activities, EGLE intends to approve the revised work plan so that RTRR can begin implementation. EGLE expects to receive an investigation report in late fall. EGLE and the facility owner will also negotiate a new Corrective Action Consent Order to address remaining work on the site. Additionally, EGLE and EPA will be working to update their Memorandum of Understanding which outlines that the northern and southern portions will be cleaned up to a similar level.

EGLE also notified the CAG of other upcoming construction activities in the immediate area:

- Fiber optic line directional drilling (ongoing);
- Railroad line work (ongoing);
- Gas line replacement (within the next year); and
- Jefferson Avenue Bridge replacement (within the next year).

EGLE has notified the relevant authorities of the high pH situation.

Mr. Messina also reviewed historical background to that area of the site. Before 1937, the entire area was part of the creek flowing southward. Since then, the creek was diverted on the northern part and filled in. EPA carried out a corrective action in the past and installed a berm

that would restrict flow of contaminants in that area of the site. Part of EGLE's phase II investigations into the site will focus on understanding the subsurface flow in the northern part of the property.

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

- **Has EGLE observed high pH at the new pool north of W Jefferson?**
  - *EGLE: We have not observed high pH but we have observed cloudiness and a film on the surface. The appearance is similar to the pool on the facility.*
- **Is water flowing underground and welling up alongside the rail track?**
  - *EGLE: Along the rail track, there are 6-inch underdrains. We suspect that the water is following that pathway.*
- **Is the property near the new pool a public access area? There needs to be some delineation along the perimeter to prevent public access, whether that's a fence or caution tape or something else.**
- **It appears to me facility owner broke through the existing berm while constructing the grade crossing, which has led to a new pathway to exit the property. Why would MDOT issue a permit for this construction?**
- **Why was Detroit Utility Wastewater Authority (DUWA) working on this site near the bridge?**
  - *EGLE: That may have been in connection to the Jefferson Ave. bridge replacement. CAG members should expect to see significant activity related to that project. EGLE has informed all relevant parties about the high pH situation so that they do not exacerbate any contamination.*
- **What is the risk to the public of the high pH level? Would it not be better to err on the side of caution, given that the roadway is heavily trafficked?**
  - *MDHHS: Based on our assessment, we decided that signage should be installed so that anyone nearby will see the signs and be aware of the situation. We believed that that would be more effective than a press release.*
  - *EPA: My understanding of the health situation is that any water becomes more corrosive as the pH deviates from 7. We have seen pH readings up to 12.4, which is approaching a regulatory threshold, but has not met that threshold. However, ultimately, the risk from exposure also depends on the nature and length of exposure (among other factors). Therefore, an effective way to reduce the risk is to have some way to notify the public and prevent further migration.*
  - *EGLE: Additionally, the risks associated with this situation are dynamic, and our response will change in accordance with those risks.*
- **Why did the facility owner not notify EGLE of their construction activities?**
  - *EGLE: The 2018 CACO had a clearly defined scope of work, and RTRR has completed all the requirements of that scope of work. The 2018 CACO only required RTRR to notify EGLE of work onsite within specific areas defined in the CACO's scope of work. The northwest area was not included in that scope of*

*work, hence, RTRR was not technically required to notify EGLE. However, we believe that it would have been wise and prudent to notify EGLE.*

*EGLE is in the process of drafting a second CACO, which we intend to be more comprehensive and will include this area of interest.*

- **Would you say that this event has improved the lines of communication?**
- *EGLE: Yes. In my opinion, communication with the facility owner has been good throughout, and we hope that it will continue to be good going forward. Throughout the process, we learned that there was a need for better and earlier communication between MDHHS, the local health department, and EGLE when situations like this arise.*

## Other Site and Member Updates, Future Discussion Topic Ideas, and Public Comment

### Nomination of a new representative from Grosse Ile Township

The CAG nominated Joseph Porcarelli, member of the Grosse Ile Township Board, to replace Russell Bodrie (who has retired as fire chief).

### MSC/Crown attendance at CAG meetings

Jim Wagner informed the CAG that he was asked to enquire about whether MSC/Crown they would attend the November CAG meeting. They declined but shared that they would consider attending in the new year.

## Wrap Up & Next Steps

Ms. Smith thanked the CAG, presenters, and members of the public for their participation, questions, and comments. The CAG plans to meet next on November 9, 2023.

The meeting was adjourned at 8:30 PM.

**Appendix A.** CAG members and agency representatives in attendance  
*Primary and alternate CAG representatives present at the **September 14, 2023** meeting are listed below.*

<b>Affiliation</b>	<b>Representative</b>
<b>City of Trenton</b>	Jim Wagner Wendy Pate
<b>City of Riverview</b>	
<b>Grosse Ile Township</b>	Joseph Porcarelli
<b>Riverview Brownfields Authority</b>	Brian Webb
<b>City of Trenton Brownfields</b>	
<b>Trenton Visionaries</b>	(Wendy Pate)
<b>Grosse Ile Nature and Land Conservancy</b>	Doug Thiel
<b>Grosse Ile Civic Association</b>	Greg Karmazin Bill Heil, alt.
<b>Friends of the Detroit River</b>	
<b>DownRiver Waterfront Conservancy</b>	
<b>Past Employees of McLouth Steel</b>	
<b>Abutters</b>	
<b>At-large Community Representatives</b>	Judith Maiga Edie Traster
<b>Liaison for Rep Debbie Dingell's Office</b>	Cal Kirchen
<b>Downriver Community Conference</b>	

Agencies & consultants represented

Greg Gehrig, US EPA Region 5  
 Nilia Green, US EPA Region 5  
 Kirstin Safakas, US EPA Region 5  
 Courtney Fung, EGLE  
 Elizabeth Garver, EGLE  
 Oona McKenna, EGLE  
 Marc Messina, EGLE  
 Andrea Keatley, MDHHS  
 Dr. Puneet Vijj, MDHHS  
 Ernest Ashley, CDM Smith

Tonya Bennett, CDM Smith  
James Romig, CDM Smith  
Brandon Chambers, Consensus Building Institute  
Stacie Smith, Consensus Building Institute