

# McLouth Steel Superfund Site Community Advisory Group (CAG)

## TECHNICAL MEETING SUMMARY

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Thursday, February 8, 2024 | Virtual Meeting No. 14

### Meeting in brief

The February 8, 2024, 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.
- Select the CAG Leadership Board for 2024

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 February Meeting Summary</li><li>● Disseminate final February 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 corrective action 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 February Meeting Summary, integrate CAG feedback, and share the final version for CAG dissemination</li><li>● Upload materials from this meeting to the CAG website</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

- 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 following members were unanimously supported to serve as the CAG Leadership Board for 2024:
  - Jim Wagner (City of Trenton);
  - Doug Thiel (Grosse Ile Nature and Land Conservancy);
  - Brian Webb (Riverview Brownfields Redevelopment Authority); and
  - Bill Heil (Grosse Ile Civic Association).

### Proposed topics for future discussion

- Review of the Public Health Assessment report from MDHHS (when available)
- Further updates on RI/FS and high pH situation (EPA & EGLE)
- Initial findings from the remedial investigation and Year 1 sampling (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. Three new agency representatives introduced themselves:

- Megan Cynar (EGLE project manager for the Southern portion);
- Christina Hebert (EGLE environmental quality analyst); and
- Alexandra Clark (EGLE enforcement section manager, filling in for Elizabeth Garver).

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

Nilia Green (US EPA Region 5) shared a map of the two sites, with the Superfund site to the south and the RTRR facility to the north.<sup>1</sup>

Afterward, Chris Vandegrift presented updates on the remedial investigation & feasibility study (RI/FS) of the Superfund site. As a reminder, the goals of the RI are:

- To provide enough detail to assess the risks posed by the site to human health and the environment; and
- To enable evaluation of potential and appropriate remedial alternatives in the FS.

EPA is administering the site under three operable units (OUs):

- OU1 evaluates the source areas, including releases to the land, fill materials, and steel slag;
- OU2 evaluates impacts to groundwater and involves assessing site hydrogeology and evaluating groundwater discharge;
- OU3 evaluates the Trenton Channel, which includes surface water discharge from the site and impacts to sediment and porewater.

For OU1 and OU2, CDM Smith completed soil borings and sampling, monitoring well installation, and well development last fall. Since the November CAG meeting, they have also

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<sup>1</sup> A copy of the map is available on the CAG website: <https://mclouthsteelcag.org/about-the-site/>

completed a synoptic round of water level elevations, groundwater sampling, and aquifer testing of monitoring wells. They also intend to conduct a survey of new monitoring wells.

For OU3, CDM Smith conducted sediment sampling last fall. Since the last CAG meeting, CDM Smith completed a round of sediment trap sampling, which resulted in limited recovery of samples. CDM Smith also intends to conduct a bathymetric survey of the Trenton Channel (to understand water depths and any underwater features) along with surface water sampling. CDM Smith had intended to conduct surface water sampling during the Year 1 sampling, but there was not a significant rain event. Surface water sampling is scheduled for Year 2.

The work in progress is as follows:

- Generation of groundwater flow maps & contaminant maps;
- Validation and tabulation of laboratory data;
- Generation of contaminant distribution figures;
- Preparation of technical memoranda; and
- Identification of data gaps and recommendations for year 2 field work.

EPA also shared a general schedule for the RI/FS, culminating with an expected date of October 2025 for a record of decision (ROD).

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

- **Are you planning to conduct sampling below the channel?**
  - *CDM Smith: We are scheduled to evaluate the bedrock aquifer under the site in Year 3. Currently, we are assessing shallow groundwater, on-site soil, and sediment within the Trenton Channel.*
- **When will results of sampling data be available?**
  - *CDM Smith: We are currently evaluating data, however that data needs to go through the quality assurance/quality control (QA/QC) process. We anticipate that data will be available in the 2<sup>nd</sup> quarter of 2024.*
  - *EPA: We plan on sharing the technical memos for each OU.*
- **In the past, Environment Canada conducted suspended sediment sampling in the river using a tube device and collected good results. EPA may wish to look into that apparatus.**
- **Could you explain what the ROD is that is expected in October 2025?**
  - *EPA: The record of decision (ROD) is the Agency's decision document for the site. At that point the investigation and feasibility study for the site will be complete. The ROD will include the most effective method of remediating the site, as selected by EPA.*
- **There is a spring that wells up by the pump house on the site. Given that there is concern about water movement on the site, it would be good to take a sample of that spring.**
  - *EPA: The spring was not included in the sampling for Year 1, however I noticed it on a recent visit to the site and will include it as a recommendation for Year 2.*

### Updates on site ownership, reuse, and other matters

CAG member Jim Wagner (City of Trenton) informed the CAG that the City has been working with EGLE regarding the DTE manhole that has been filling up and overflowing near the site. However, it is still not understood why the manhole is overflowing.

Mr. Wagner also shared that there is a pending agreement between MSC Land Company and the Detroit Steel Company (the Wilkinson family) to convey DSC's parcels within the NPL site to MSC. Nilia Green (EPA) noted that MSC has not yet approached EPA regarding this matter. However, MSC had previously informed EPA that they would reach out to EPA about entering into a new prospective purchaser agreement (PPA) prior to acquiring the parcels.

Additionally, Mr. Wagner informed the CAG that the Downriver Community Conference is conducting a study of options to market the site under the confines of the agreements related to the cleanup. Mr. Wagner will share that study with the CAG when it is published.

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

- **How can the site be reused if the RI/FS is incomplete?**
  - *Jim Wagner: The terms of the agreement allow MSC to market the site, so long as they are in compliance with their agreement with EPA. The purpose of the study is to determine if marketing the site would be workable. No construction would take place on the site without the permission of EPA, EGLE, and the City of Trenton.*
  - *EPA: I would add that the findings of our RI/FS would be useful for determining risk and exposure pathways on the site.*
  - *CBI: To clarify, the terms of the agreement require the owners to accommodate the continued investigation and ultimate remedy selected by EPA.*

### Updates on the RTRR site (northern portion)

Marc Messina from EGLE updated the CAG on the investigation and remediation of the northern portion of the Riverview Trenton Railroad (RTRR) facility. Mr. Messina highlighted that the site is complex from a hydrogeological standpoint, due to the presence of fill material that is likely functioning as a pathway through which water can flow more readily than the surrounding material.

In December, Wayne County Department of Public Services observed more pooling of high pH solution north of W Jefferson Avenue and notified EGLE Materials Management Division (MMD). EGLE staff then contacted RTRR to inform them of the pooling. EGLE MMD staff visited the property in late January and observed high pH solution flowing into Monguagon Creek via an outfall on the north side of W Jefferson Avenue. The pH was measured at 11.63. EGLE also observed a white precipitate covering the surface of the Creek.

EGLE MMD then contacted EGLE Water Resources Division (WRD) to coordinate next steps. EGLE MMD learned that EGLE WRD had issued a permit to RTRR in November 2022 to remove the existing outfall and construct a new outfall to the Creek as part of rail crossing construction. The new outfall would be a 1.5-foot diameter concrete pipe that would be buried beneath the surface.

RTRR's consultant ASTI began work under the Interim Measures Work Plan at the end of January. The purpose of the Work Plan is to propose actions to immediately prevent the discharge of impacted groundwater into Huntington (Monguagon) Creek and to investigate and determine the nature of the discharge, including the conditions under which the discharge occurs. Mr. Messina was on-site recently to observe the field work over 2 days. According to the schedule outlined in the Work Plan, ASTI is expected to complete the investigation in late April.

While on-site, Mr. Messina observed and sampled several locations with high pH:

- A groundwater seep emanating from the RTRR shoreline into Monguagon Creek (pH of 12.44);
- Water observed pooling off-site to the north along the railroad (pH of 12.74);
- Water in the ditch/outfall on the north side of West Jefferson Avenue (pH of 12.23); and
- The on-site area immediately south of the railroad crossing (pH of 13.00).

EGLE then contacted RTRR and requested that the facility owner:

- Coordinate with the City of Riverview to provide resources to restrict public access to the pooled liquids;
- Begin pumping groundwater to control migration and upwelling of high pH solution; and
- Provide a plan to EGLE to investigate and remedy the mechanism(s) responsible for the migration and upwelling of the high-pH liquid in the northwest corner.

Since then, RTRR has installed a temporary fence and is working to install a pump system to remove groundwater and store the groundwater in frac tanks.

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

- **What level of pH is considered hazardous to human contact?**
  - *EGLE: Characteristically, any pH higher than 12.5 is considered hazardous.*
- **Could you explain the value of enclosing the outfall and conveying it to the Creek?**
  - *EGLE: The new outfall is meant to limit human exposure along what would previously have been an open ditch.*
- **Are these new pumps?**
  - *EGLE: Previously, the facility owner was pumping into frac tanks using sump pumps. They will be using the same setup. I will be on site next week to observe the setup.*
  - **How deep will they be pumping? There is a layer of limestone that goes 3-4 feet below the road. Logic would dictate that they would need to reduce the water table so that it is below this ballast layer.**
  - *EGLE: As part of the permit for the rail crossing, the facility owner appeared to construct 2 6-inch underdrains, which are perforated pipes. I suspect that those pipes might be responsible for the migration of the solution. I am not sure what*

*rate or depth they would need to pump, but they would need to overcome the mounding that is going on in that area.*

- *EGLE: This will not be the “be-all and end-all, we intend to use this investigation to inform and address the ultimate question of why this is taking place on this site.*
- **In the 1990s, Michigan Department of Environmental Quality (MDEQ) had to drain and clean out the Creek due to contaminants in the sediments. I am curious about how much of that contamination has been building up in the sediment. I would advocate for a new round of sediment sampling in the Creek.**
  - **The City of Riverview could petition the County Drain Commission to explore this.**
- **Was RTRR required to conduct testing or any other kind of certification before they began to modify the rail crossing?**
  - *EGLE: As part of their application for one of the permits issued by WRD, RTRR represented that the activities would not result in any illegal discharges to the waters of the State. EGLE is still evaluating this criterion; at the moment, nothing is off the table. MMD currently has an existing Corrective Action Consent Order (CACO) that provides for enforcement in emergency scenarios. There are also other enforcement actions which EGLE could take, including a court order, unilateral order, doing work ourselves and seeking cost recovery, and/or referring the matter to EPA for a response action.*
- **Was the facility owner aware of the issues related to the pooling before EGLE contacted them?**
  - *EGLE: I do not have a good answer for that. RTRR owned the property during the last time-critical response in 2011, however I cannot speak to whether the staff is the same. I would like to think that if they knew that the materials were hazardous, they would have taken mitigation measures.*
- **Where is the water in the frac tanks going?**
  - *EGLE: Clean Harbors was previously disposing of their frac tanks. I am not sure who is disposing of it this time.*
  - *EGLE: Our requirement is that the water be containerized, characterized, and properly disposed of.*
- **Was the fencing installed by the property owner or City of Riverview? Why were the signs put up by the City of Riverview rather than the County?**
  - *EGLE: The fencing was installed by the facility, and the City of Riverview said they would keep an eye on the fencing. Regarding the signs, given the immediate nature of the pooling, we thought it made sense to work with whatever resources were most readily available. We would like to thank the City and County for their work and assistance.*

- **It should be clear to everyone that there is a major problem on this site, and I hope that there is a long-term plan rather than just putting a Band-Aid on the issue.**
  - *EGLE: That is the goal of the corrective action program. Liability follows the land, and the owner will have an obligation to investigate and address any contamination on and migrating from the property. EGLE will be enforcing that liability going forward.*
- **Wyandotte and Trenton are developing a “trail town” identity, and I am concerned that the signage will not be enough of a warning for people biking through the area.**
  - **Last year, we discussed 3 areas of concern where signs should be placed (the south side of Jefferson close to where the motorcyclist burn incident, directly across the road where there is a sign now, and then closer to the Creek where the waterway goes underneath the bridge). Why did you decide not to place signs at the other 2 locations.**
  - *EGLE: There are currently two signs up, however the placement of the signs is not something EGLE was involved in. We can share that information with the County.*

## Internal CAG business

### Selection of 2024 CAG Leadership Board

Each year, the CAG selects a subset of members to serve on a Leadership Board, to help develop the CAG agendas and follow up on action items. Three of the existing Leadership Board members (Jim Wagner, Doug Thiel, and Brian Webb) expressed interest in continuing in that role. One of the Leadership Board members, Wendy Pate, stepped down from the Board due to her move out of the area. Bill Heil volunteered to step into the role. All of the CAG members agreed that the Leadership Board for 2024 would be:

- Jim Wagner (City of Trenton);
- Doug Thiel (Grosse Ile Nature and Land Conservancy);
- Brian Webb (Riverview Brownfields Redevelopment Authority); and
- Bill Heil (Grosse Ile Civic Association).

### Update on EPA facilitation contracting

Diane Russell (US EPA Region 5) reminded the CAG that EPA uses a contract mechanism for facilitation of the CAG, which will be transitioning at the end of July. Given that the CAG is slated to meet in May & August, Ms. Russell does not expect any interruption in service. However, she will inform the CAG if any issues arise.

### Other member updates

Jim Wagner (City of Trenton) shared that he recently attended a webinar with EPA Headquarters on redevelopment of Superfund sites. He highlighted that everything that is taking place at the McLouth Steel site is in line with what is being done across the country. He also noted that the City of Trenton intends to make sure that anyone who develops the site conforms to all regulations and the City will collaborate with whoever needs to be involved.

## Public Comment

Three members of the public gave public comment:

- One individual complained about light pollution from the McLouth Steel parking lot affecting residents of West River Road. Mr. Wagner informed that the City of Trenton's Police Department requested the lights out of concerns around safety and security.
- Another individual recalled an issue in the past related to a chemical spill that caused the County to close W Jefferson Avenue.
- A third individual requested information about the Hennepin Point facility in Grosse Ile.

## Wrap Up & Next Steps

Ms. Smith thanked the CAG, presenters, and members of the public for their participation. The next meeting will take place on May 9.

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 **February 8, 2024** 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>	
<b>Riverview Brownfields Authority</b>	Brian Webb
<b>City of Trenton Brownfields</b>	Robert Howey
<b>Trenton Visionaries</b>	(Wendy Pate)
<b>Grosse Ile Nature and Land Conservancy</b>	Doug Thiel Paul Gloor, alt.
<b>Grosse Ile Civic Association</b>	Greg Karmazin Bill Heil, alt.
<b>Friends of the Detroit River</b>	Robert Burns
<b>DownRiver Waterfront Conservancy</b>	Paul Frost
<b>Past Employees of McLouth Steel</b>	
<b>Abutters</b>	Robert Johnson
<b>At-large Community Representatives</b>	Judith Maiga
<b>Liaison for Rep Debbie Dingell's Office</b>	Cal Kirchen
<b>Downriver Community Conference</b>	John D'Addona

Agencies & consultants represented

Nilia Green, US EPA Region 5  
Diane Russell, US EPA Region 5  
Kirstin Safakas, US EPA Region 5  
Amber Falkner, US EPA Great Lakes National Program Office  
Alexandra Clark, EGLE  
Megan Cynar, EGLE  
Courtney Fung, EGLE  
Chrisina Hebert, EGLE  
Marc Messina, EGLE  
Joost Van't Erve, MDHHS

Chris Vandegrift, CDM Smith  
Brandon Chambers, Consensus Building Institute  
Stacie Smith, Consensus Building Institute