

McLouth Steel Superfund Site Community Advisory Group (CAG)

TECHNICAL MEETING SUMMARY

Thursday, May 9, 2024 | Virtual Meeting No. 15

Meeting in brief

The May 9, 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.

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">● Provide feedback to improve the accuracy of this draft May Meeting Summary and disseminate final May Meeting Summary to constituents and community members
US EPA/EGLE	<ul style="list-style-type: none">● Continue to share updates on RI/FS for the NPL site and corrective action on the RTRR portion at future meetings● Share OU1 Year 1 technical memorandum and comments with CAG once uploaded to EPA website
CDM Smith	<ul style="list-style-type: none">● Do a preliminary evaluation of contamination at surface level with respect to parking of cars
MDHHS	<ul style="list-style-type: none">● Share updates on the Public Health Assessment when available
CBI	<ul style="list-style-type: none">● Produce and distribute the draft May Meeting Summary, integrate CAG feedback, and share the final version for CAG dissemination● Upload materials from this meeting to the CAG website● Coordinate with Leadership Board on agenda for the next CAG meeting and internal CAG business

Decisions reached & proposed topics for future discussion

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 Year 1 sampling for OU2 & OU3 and Year 2 plan (EPA & CDM Smith)

Summary of Discussions

Consensus Building Institute (CBI) facilitator Stacie Smith welcomed participants and reviewed the meeting agenda and ground rules. Ms. Smith introduced Meira Downie, who is a Junior Associate at CBI and will be joining the facilitation team.

Updates on the NPL site (southern portion)

Nilia Green (US EPA Region 5), Chris Vandegrift (CDM Smith), and Ernest Ashley (CDM Smith) 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.

Mr. Ashley shared results of soil sampling data. EPA and CDM Smith set a *project action limit (PAL)* for each of the constituents analyzed. These PALs are conservative values and are based on EPA and EGLE human health and ecological screening criteria. If constituent concentrations at a certain location exceed PALs, that is an indication that location might require further evaluation. If the concentrations are below PALs, then there is no further need to evaluate them.¹ These data are outlined in a technical memorandum, which EPA & EGLE are currently reviewing. EPA will upload the memo, along with comments, to EPA's website once finalized.

Mr. Ashley presented a synopsis of soil sampling results; key points for each of the constituents analyzed were as follows.

- Trichloroethylene (TCE) and tetrachloroethylene (PCE): These constituents were mostly non-detected or below the PAL for the site, except in one location at the north end of

¹ Maps detailing sampling locations and constituent distributions are available on slides 9-11 here: https://mclouthsteelcag.org/wp-content/uploads/2024/05/McLouth-Steel-RI-for-CAG-5_9_24-Meeting-FNL.pdf.

the site (5 times above the PAL for PCE) and a couple of locations in the central and southern sections of the site.

- Naphthalene: This is a constituent usually associated with fuels. Samples from locations throughout the site exceeded the PAL by 5 times. One location in the center of the site and two locations in the south exceeded the PAL by over 50 times.
- Benzo(a)pyrene: B(a)P is a polycyclic aromatic hydrocarbon (PAH) and is a semi-volatile organic compound (SVOC) that is commonly associated with incomplete combustion of fuels. Several locations across the site were non-detect or below the PAL, but several locations throughout the site exceeded the PAL. A couple locations in the center and south of the site exceeded the PAL by over 5 times.
- Polychlorinated biphenyls (PCBs): Several locations across the site exceeded the PAL. One location in the center of the site exceeded the PAL by over 500 times. There are also a couple of locations of interest on the north of the site.
- Lead: Most locations were below the PAL, but there were several locations of interest on the southern end of the site which exceeded the PAL by 2 times (This included the former wastewater treatment area).
- Manganese: Manganese is a naturally occurring element and is also used in steelmaking operations. The metal is widespread in surface soil on the site, with all locations sampled exceeding the PAL, and several exceeding the PAL by 10,000 times.
- Antimony: Several locations were non-detect or below the PAL, but a couple of locations in the southern end of the site exceeded by 10 or 50 times (generally in the former active manufacturing area).
- Iron: Iron is a naturally occurring element and is one of the main elements involved in steelmaking. Iron is nearly ubiquitous on the site, with most locations exceeding the PAL by 2,500 to 10,000 times.
- Zinc: Several locations across the site exceeded the PAL, and a couple locations in the north, central, and southern areas (generally former active manufacturing areas) exceeded the PAL by 10 times.

EPA & CDM Smith have received the analytical results from the sediment and groundwater sampling events, with results currently undergoing validation and will be shared at a future CAG meeting. EPA & CDM Smith are determining field work requirements for year 2.

Finally, Mr. Ashley shared a general schedule for the upcoming RI/FS field work that includes Year 2. Field work in the summer/fall of 2024 includes additional soil borings, soil sampling, installation of monitoring wells, groundwater sampling and sediment sampling. Preparation and implementation of groundwater monitoring and bedrock aquifer needs assessment is scheduled for the Spring of 2025. The development of the RI/FS is expected late 2025.

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

- **Did you sample for other contaminants apart from the ones presented?**

- *CDM Smith: Yes, there were a total of 13 contaminant distribution figures included in the technical memorandum.*
- **You mentioned that iron and arsenic are naturally occurring metals and are also widely distributed on the site. Is there any additional risk from those distributions?**
 - *EPA: As part of the RI/FS, EPA and CDM Smith will be developing human health and ecological risk assessments, which will outline the risks posed by these contaminants.*
- **The owner has been parking and storing vehicles on the site, which may convey surface-level contaminants off site as they come and go. Is that a concern?**
 - *CDM Smith: Areas with high levels of PCBs have been demarcated in the field. For other contaminants such as manganese, we know that they were monitored as part of the demolition activities, and the values were low. Therefore, we do not think that surface exposure is a high risk driver at this moment. I can take on an action item to do some preliminary evaluation of contamination on the surface relative to the storage of cars.*
 - *MDHHS: Typically, PALs for dust exposure are much higher than those set for surface contact. We will also be investigating different exposure pathways as part of the Public Health Assessment.*
- **The lack of activity on the site has allowed vegetation to re-grow, which helps reduce wind erosion. Until we know the extent of the risks, it would be wise to maintain this vegetative cover.**
- **During the demolition phase, there were dust and traffic control work plans in place. Are those still in force?**
 - *EPA: I have not seen those plans as of yet but can look into that.*
- **Are PAL exceedances dependent on the depth of the sample?**
 - *CDM Smith: No, exceedance at any level is classified as an exceedance. We also plan to evaluate exceedances in fill vs native material (which is more difficult on this site).*
- **Are there different standards for exceedance based on depths?**
 - *CDM Smith: Not in this case. The PALs we selected were the most conservative level for protectiveness of human health & environment.*
- **Are the depths of samples determined based on some kinds of standards? Is the depth determined by whether the intended future use is commercial vs. residential?**
 - *CDM Smith: Yes, insofar as risk assessors consider certain depths to be surface exposure under certain scenarios. For example, we considered 0 to 6 inches surface exposure, but for construction purposes, it might be a few feet of depth. In our case, we intend to cover all bases, so we will take note of any anomaly at any depth.*
- **Do you have a sense of how these constituent distributions could determine what remediation options would be needed for different portions of the site?**
 - *CDM Smith: Remedial decisions for any location would be determined based on several factors, including concentration, distribution, and whether the*

contamination is widespread or localized to a particular point. The risk assessment process will determine whether these factors rise to a level that requires remedial action. We still have some time to go before we understand what kind of risk is present, and where and what specific actions should be taken.

Updates on the RTRR site (northern portion)

Afterward, Oonagh McKenna (EGLE) provided updates on the investigation and corrective action for the northern portion (RTRR parcel), particularly the Area of Interest on the northwest corner of the parcel. Since the February CAG meeting, CAG member Bob Burns observed water pooling on the RTRR parcel and flowing through the storm drain into the creek. He informed EGLE, and EGLE contacted RTRR and requested that they continue to monitor the situation. EGLE visited the site on April 16. On May 1, EGLE observed high pH liquid on the north side of W Jefferson Avenue, after which EGLE again contacted RTRR and required them to halt offsite migration.

Currently, RTRR is required to pump as much as is needed to prevent offsite migration. EGLE is also setting up a meeting with RTRR, Wayne County, and Great Lakes Water Authority to discuss a plan of action to investigate and address the source of the mounding water in the area. EGLE is also awaiting RTRR's submittals of its Area of Interest interim report (expected by the end of that week) and an outfall report.

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

- **Is there any record of how often RTRR is pumping on site? I wonder if there is any connection between the occurrence of seeps and the level of precipitation.**
 - *EGLE: For now, we will assume that regardless of precipitation levels, pumping is necessary to keep down the water table. We spoke with Mark Fletcher from RTRR and outlined that if they were pumping frequently enough, we would not expect to see this feature. He informed me that as of yesterday, they have pumped 7000 gallons. We made it clear that our expectation is that RTRR should prevent offsite migration while we investigate the cause of what is going on.*
- **What is the pH of water flowing from the storm drain into the creek? I am concerned that directing the contaminated water into the creek via the covered storm drain reduces human health risk at the expense of ecological impact of the creek.**
 - *EGLE: When the calcium hydroxide feature is present, we see pH in the region of 10-11. Given the flow rate and saturation levels of the geology in the region, any water that emerges would ultimately make its way to the creek anyways.*
- **There is a sidewalk on the north side of the creek that is disrupted, and I am concerned that walkers and bikers cannot use the roadway safely, especially as the soil in the area is now likely contaminated. There should be an extension of the sidewalk to facilitate safe movement of pedestrians and bikers.**
 - *Bob Burns: Friends of the Detroit River is working with the Downriver Community Conference on a proposal to link greenways and ensure a sidewalk situation is set up within the next couple of years.*

- **There should be a temporary sidewalk—this would not require major investment.**
- *Wayne County Department of Public Services: I would recommend following up on the timeline for the bridge redevelopment project, and also the City of Riverview as they own that piece of land.*
- **Would well installation be useful for determining the source of the water flow?**
 - *EGLE: Potentially. Once we receive the interim investigation report, we will determine what data gaps there are and what methods we RTRR should use to continue to investigate the issue.*
- **Has there been any dye testing done? Is the sewer system potentially a pathway by which water is being released?**
 - *EGLE: Dye-testing was initially considered when we needed to determine whether high pH liquid on the north side of W Jefferson Ave was coming from the RTRR property. We were able to confirm via visual evidence, which obviated the need for dye-testing. Otherwise, we think it is a bit premature to consider dye-testing further.*
 - *Wayne County Department of Public Services: Based on permits we have issued for the construction of the outfall and investigations of the storm sewer lines, we are not currently considering dye-testing as we have drawings to show the sewer connections. The outfall is meant to capture stormwater, but we think there might be some infiltration at the corner of W Jefferson Avenue. One possibility is that during construction of the rail spur, some of the mortar surrounding a pipe came loose. We would aim to backfill that mortar once conditions allow.*
- **Is the sump pump manually operated? Is there a reason not to require an automatic pump?**
 - *EGLE: We required the facility owner to stop offsite migration and left it up to them to determine how to do that. I would note that there are some liabilities and additional monitoring requirements associated with “automatic” systems.*
- **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.*
- **Is there a long-term solution for the issue other than digging up and hauling out all of that calcium hydroxide?**
 - *EGLE: EGLE is working on a more general phase 2 investigation for the entire northern portion, which will inform a final corrective action. However, for the moment we are focused on those two Areas of Interest.*

Other site-related updates

- Joost Van't Erve (MDHHS) informed the CAG that MDHHS is still in the process of internally reviewing the Public Health Assessment for the site.
- Bob Johnson also informed the CAG that he has been consulting with individuals about pollution along the fence line in the northern section of the property. The City of Trenton has been working on the issue to little avail. Mr. Johnson recommended that citizen groups work with the property owner to improve the fence line.

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 Thursday, August 8.

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 **May 9, 2024** meeting are listed below.*

Affiliation	Representative
City of Trenton	
City of Riverview	
Grosse Ile Township	Joe Porcarelli
Riverview Brownfields Authority	Brian Webb
City of Trenton Brownfields	
Trenton Visionaries	Wendy Pate
Grosse Ile Nature and Land Conservancy	Doug Thiel
Grosse Ile Civic Association	Greg Karmazin
Friends of the Detroit River	Robert Burns
DownRiver Waterfront Conservancy	
Past Employees of McLouth Steel	
Abutters	Robert Johnson
At-large Community Representatives	Judith Maiga
Liaison for Rep Debbie Dingell's Office	
Downriver Community Conference	John D'Addona

Agencies & consultants represented

Nilia Green, US EPA Region 5
 Diane Russell, US EPA Region 5
 Megan Cynar, EGLE
 Elizabeth Garver, EGLE
 Christina Hebert, EGLE
 Oonagh McKenna, EGLE
 Marc Messina, EGLE
 Joost Van't Erve, MDHHS
 Jennifer DePaulis, Wayne County Department of Public Services
 Ernest Ashley, CDM Smith
 Chris Vandegrift, CDM Smith
 Brandon Chambers, Consensus Building Institute
 Meira Downie, Consensus Building Institute

Stacie Smith, Consensus Building Institute