

# McLouth Steel Superfund Site Community Advisory Group (CAG)

## TECHNICAL MEETING SUMMARY

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Thursday, September 12, 2024 | Virtual Meeting No. 16

### Meeting in brief

The September 12, 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"><li>● Provide feedback to improve the accuracy of this draft Meeting Summary and disseminate final 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><li>● EPA to follow up with MSC about the timeline for tree removal along West Jefferson</li><li>● EGLE inform the CAG about any website updates and review letters</li><li>● EPA Community Involvement team explore development of update videos for the public to be shared via QR code at the site's fence line</li><li>● EGLE will try to find information on the jurisdiction of the sidewalk in the northern portion of the site</li><li>● EPA will inquire about ongoing tree clearing on the shoreline</li></ul>
CDM Smith	<ul style="list-style-type: none"><li>● Request analytical results of the water pumped from the Quarry</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</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> <li>● Review recent attendance of CAG membership at meetings and seek active representatives for CAG seats</li> </ul>

### Proposed topics for future discussion

- Discussion of Public Health Assessment report from MDHHS
- 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 explained that the August meeting had been postponed until today due to a facilitation contracting transition, and introduced Meira Downie, a Junior Associate at CBI who 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 an overview of the work completed, site geology and groundwater sampling results. 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 need to further evaluate them.<sup>1</sup> This data is outlined in a technical memorandum, which is available on EPA's website along with the review letters.

Mr. Ashley presented a synopsis of groundwater results. Key points for each of the constituents analyzed were as follows:

- Trichloroethylene- TCE is an industrial solvent often used for degreasing. There are a few locations where there are concentrations that exceed the PAL. The concentrations were relatively low across the site.
- 1,4 Dioxane- This is a volatile organic compound that was used as a stabilizer for some solvents. There were some detections in the major plant areas of the site. There was not much detected in the northern part of the site and much of the site was less than the PAL.
- Benzene- This is an element of gasoline. There are a few areas in the northern portion of the site where benzene exceeded the PAL. In general, high concentrations of benzene were not largely present across the site.
- Naphthalene- This is an element of fuels. There were 4 locations with relatively high concentrations across the site. In general, many of the concentrations recorded were close to the PAL.
- Pentachlorophenol (Phenols)- Phenols are used in manufacturing. There were a few locations that exceeded the PAL while the remainder of the site had concentrations close to the PAL.
- PFOS (Perfluorooctane sulfonate)- PFOS, a perfluoroalkyl substance (PFAS) which are often referred to as "forever compounds" and may have been in firefighting foam. There are not particularly high concentrations of this compound in the southern portion of the site. However, there are a few locations that exceed the PAL that may inform where additional data could be collected.
- Antimony- These constituents were mostly below the PAL for the site with the exception of a few elevated detections closer to the manufacturing area of the site.
- Arsenic- Arsenic is widely distributed across the site at elevated concentrations relative to the PAL.
- Cobalt- There was one location in the southern portion of the site where cobalt exceeded PAL.
- Lead- There were two detections that exceeded PAL - one located in the northern area of the site and the other located at the southern area of the site.
- Manganese- This metal is associated with steel manufacturing. There were several areas across the site that exceeded PAL.
- Mercury- Most locations were below the PAL, but there were several locations of interest spread across the site with elevated concentrations that exceeded the PAL.
- Vanadium- Vanadium is a metal that is known to be associated with steel manufacturing. There were four exceedances of the PAL in the southern area of the site, one in the

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<sup>1</sup> Maps detailing sampling locations and constituent distributions are available on slides here:  
[https://mclouthsteelcag.org/wp-content/uploads/2024/10/McLouth-Steel-RI-for-CAG-9\\_12\\_24-Meeting-1.pdf](https://mclouthsteelcag.org/wp-content/uploads/2024/10/McLouth-Steel-RI-for-CAG-9_12_24-Meeting-1.pdf)

central area and, two in the northern portion of the site. The remainder of the site was below the PAL.

Finally, Mr. Ashley shared general schedule for the RI/FS that includes Year 2 field work in the Fall of 2024, preparation and implementation of groundwater monitoring and bedrock aquifer needs assessment in Spring of 2025 and culminating in development of the RI/FS with an expected date of October 2025 for a record of decision (ROD).

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

- **Do you think there's a potential of groundwater moving off of the site, into the quarry, and ending up in the river?**
  - *CDM Smith: That is possible. There is a four-foot gradient towards the west . So yes, there is an element of groundwater that appears to be moving that way and that groundwater will likely be discharged to the river.*
- **I am curious if you were also measuring the water elevation in the wells and if you have seen much fluctuation in the timeframe you were monitoring these wells?**
  - *CDM Smith: We have done one synoptic round, meaning we measure every well within a short period of time to get a snapshot figure of which way groundwater flows. In the next round of work we will install pressure transducers that will record over a period of time fluctuations in some of the monitoring wells that would be influenced by river and precipitation. We have not done any long term study at this point.*
- **Given the high levels of precipitation in the area, I am curious how much groundwater penetration there is on the site and if you are monitoring how much water levels rise and lower within the wells**
  - *CDM Smith: It is important for us to understand the impact of rain on the groundwater wells. This site doesn't have a lot of vegetation that creates evapotranspiration, taking up the water and putting it right back up into the air. So, when we deploy our pressure transducers, we'll get a sense of how our monitoring wells and the water levels at the site respond to precipitation.*
- **How do the sediment pots work?**
  - *CDM Smith: They are designed to capture the sediment as it comes down the channel. The pot is placed on the bottom and sediment is supposed to settle in the pot.*
- **Could the current's flow wash sediment out of the pot? Could you look at a different apparatus if you continue to have collection issues?**
  - *CDM Smith: There are other areas on the site where we will try to collect sediments again with the sediment pots.*
  - *EPA: In Year 2 of the investigation the sediment traps will stay in for a longer period of time with the hope this will give them a longer time to collect sediment.*
- **The limits at which you are testing contaminants are those of future industrial use or future multipurpose use?**
  - *EPA: We have different screening levels or project action limits for the soil, groundwater and sediment. Because we are in the screening phase we select the most conservative levels. We are screening at this low level before we do our risk assessment.*

- *Member: To clarify, the City of Trenton's Waterfront Revitalization Zoning for the site will allow any non-residential use. The Settlement Agreement calls for industrial or light industrial, but the Zoning is more flexible.*
- **Could the site owners add signage to the fence line of the site in order to beautify the fence line? They could update the community about ongoing testing updates that could put out and inform people of the good things that are happening on the site.**
  - *EPA: Part of MSC's settlement agreement is to add vegetation and landscaping, and this is included in their redevelopment plan. If there is interest, EPA can look into adding signage with a QR code that links to videos that update the public about the site.*
- **As we're cleaning this up, are we facing a situation where contaminants that are north of us coming south will be piled up in the future and give us problems?**
  - *EPA: That is why we are doing landside and waterside investigations. This will be a comprehensive investigation of what is here and what is going on offsite.*
- **Have you reviewed any historical log of previous dredging on the site?**
  - *CDM Smith: I have not. I know, based on bathymetric information, there is a dredged portion of the channel up against the bulkhead on the McLouth facility and planned remediation of the channel just north of the McLouth facility.*
- **During these heavy rain events, are you looking for sheet water runoff off the site?**
  - *CDM Smith: We have not had such a large rain event that we have seen any sheet water off the site. We were looking at the outfalls during the largest rain event while we were out there and did not see much water produced. We did see one seep in the vicinity of the wastewater treatment plant and sampled the water which is still under review.*
- **Can you characterize what you mean by quantifying how much water would be going from the site into the quarry?**
  - *CDM Smith: Not at not at this time. In that, we understand from reviewing that groundwater contour figure, that some water flows from the site in a westerly direction. We are going to install some additional monitoring wells, so we have a better ability to understand what is in that water and we can do these hydraulic conductivity tests to get an understanding of how much water flows, or how well it flows in those directions,*
- **Will there be any tests under the subsurface of the bedrock?**
  - *CDM Smith: Phase 3 is when we evaluate the bedrock aquifer needs assessment.*
- **What is your overall impression of the contamination of the site based on this first set of data?**
  - *CDM Smith: These are typical steel mill contaminants that are on the surface there's no large plumes, there are no liquid phase products that are underneath the site that we are concerned about migration.*
  - *EPA: There have been no surprises in the data. We are doing year 2 and year 3 investigations so we do get a better handle on it before we do our risk assessment.*
  - *CDM Smith: We do not see pools of the product like oils or fuels. We do not see plumes of volatile organics that would create a vapor problem. This site looks like a site that could be redeveloped given that there are proper controls in place. This is later down the road in the process.*

- *Member: It is important to remember that a lot of remediation has been done to the site already.*

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

Next, Marc Messina (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. Mr. Messina also reported that there is film indicating there was a potential shipwreck on the eastern northern portion of the site. Since the May CAG meeting, EGLE coordinated a meeting on June 3rd between RTRR, Wayne County and the Great Lakes Water Authority (GLWA) to discuss the possible sources contributing to the high groundwater tabling in the northwest area of the site. GLWA agreed to conduct a shut down test of the water main that goes through the mounding area. EGLE visited the site July 19th and observed high pH liquid entering the creek and contacted RTRR, and they conducted pumping. In August EGLE was notified that Wayne County would conduct work to seal the storm drains that are located where high pH has been found on the site. EGLE conducted a site visit September 11th to access the efforts on the storm drains and noticed water actively traveling through the storm drain system and exiting the outfall into creek. Currently RTRR are continuing pumping in that region as an interim measure.

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

- **I saw a hose that appeared to be dumping into the storm drain but heard that it was actually pumping the ph water out. Is this a true statement?**
  - *EGLE: Yes there is a sump pump that goes into the two storm drains.*
- **In the beginning of July, when we did have a lot of rain, there was a lot of standing water on the tracks on the north side. It looked like it was just standing groundwater. It didn't look like the frothy white material usually associated with the calcium hydroxide. When we notice something like that, should we still contact EGLE?**
  - *EGLE: I think you should always contact us, and include photos via email.*
- **This has been going on for quite a long time. At what point does EGLE have the ability to make it punitive?**
  - *EGLE: That is in the works*
- **Has the calcium hydroxide source area been delineated?**
  - *EGLE: It has not been delineated yet. The full delineation is going to be included in phase 2.*
- **Is there a risk for the people cleaning up and weed whacking along the road in tennis shoes and no mask?**
  - *EPA: MSC presented a dust management plan outlining what they were going to do and we expressed to them they would need to have a hazard communication with them. That would be one of their contractors or their employees, and it is their responsibility to make sure that their employees are aware of what's going on at the site.*
  - **Are you referring to the tree clearing and other work that's going on the site, and is that work ongoing?**

- EPA: Yes. As of last week, we were told that the clearing work is ongoing and we were given no end date. I expressed your concerns that they leave some trees along the shoreline.
- **Will there be any kind of ground cover put down to help reduce the dust?**
  - EPA: The plan wasn't to completely clear the vegetation. They were going to take down the trees, and they were basically gonna cut the grass and do some brush cutting, not actually use herbicide and remove all of the vegetation on the site. I have not received any additional plan about ground cover.

### Other site-related updates

- They are no longer storing vehicles on the site
- 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.

### 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, November 14th.

The meeting was adjourned at 8:50 PM.

*Next Meeting: Thursday November 14, 2024*

## Appendix A. CAG members and agency representatives in attendance

Primary and alternate CAG representatives present at the **September 12, 2024** meeting are listed below.

Affiliation	Representative
City of Trenton	
City of Riverview	
Grosse Ile Township	
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	Bill Heil
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

Christina Hebert, 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

Meira Downie, Consensus Building Institute

Stacie Smith, Consensus Building Institute

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