



STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



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January 11, 2008

Mr. Brian M. Kelly
On-Scene Coordinator
Emergency Response Branch
United States Environmental Protection Agency
Region 5
9311 Groh Road, Room 206
Grosse Ile, Michigan 48138

SUBJECT: DSC-Trenton Site, 1491 West Jefferson Avenue, Trenton, Michigan,
ID No. B5KV

Per your January 10, 2008, request, this correspondence is to inform you that staff of the Department of Environmental Quality (DEQ), Waste and Hazardous Materials Division, are providing periodic oversight inspections of Detroit Steel Company's (DSC) actions to address containerized wastes at the above-subject facility. DSC actions and self-imposed timelines to address the concerns of the DEQ and the U.S. Environmental Protection Agency (U.S. EPA) were delineated in the November 14, 2007, correspondence from DSC's counsel to the DEQ and the U.S. EPA.

As of January 11, 2008, the DEQ has verified that the following actions were complete:

1. The majority of drums and containers of new, used, or expired products, and hazardous wastes or liquid industrial wastes have been moved to a centralized, protected location. These containers are being stored in a manner that minimizes the potential for a release to the environment. There are a few containers remaining that have not been relocated due to various difficulties associated with their location.
2. All containers of wastes were characterized as needed for proper disposal. Additional characterization of some wastes may be needed to ensure proper characterization and disposal.
3. DSC continues to remove floating oil from pits and sumps on an as-needed basis to prevent the accumulation of floating oil in the Sedimentation Basin. DSC is also implementing measures (wailers) to deter waterfowl from entering surface impoundments.
4. Repairs to the security fencing on the southeastern property boundary are complete.

5. DSC representatives have reported that from January 2, 2008, through January 7, 2008, all roll-off boxes containing Concast Water Plant Grit and Slushing oils were removed for proper disposal. Numerous containers of hazardous and nonhazardous wastes were also removed for proper disposal.

The DEQ understands that the containers of calcium carbide and additional containers of oils and greases are scheduled to be removed by January 31, 2008.

Based on the DEQ's inspections and weekly reports from DSC, it would appear that DSC is on schedule to meet the January 31, 2008, deadline for having all containerized wastes removed from the facility and their proper disposal arranged.

Please be advised, the DEQ's oversight does not include oversight of DSC's actions to address polychlorinated biphenyl- (PCB-) containing equipment. The DEQ believes that oversight for PCB-related issues will be provided by the U.S. EPA.

If you have any questions regarding this matter, please contact me at 517-241-9540.

Sincerely,



Dan Yordanich
Environmental Quality Specialist
Enforcement Section
Waste and Hazardous Materials Division

cc: Mr. Lawrence AuBuchon, DEQ
Mr. Edward Novak, DEQ
Ms. Tracy Kecskemeti, DEQ
Mr. James Day, DEQ
Mr. Richard Conforti, DEQ