

**WORK PLAN**  
**Dust Control**  
**Riverview-Trenton Railroad Company**  
**Former McLouth Steel Site**  
**18251 West Jefferson Avenue**  
**Riverview, Michigan**  
**Site Identification Number: MIK420024889**

June 28, 2019

**Prepared For:**  
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ASTI Project No. 10860



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## **1.0 Introduction**

ASTI Environmental (“ASTI”) has prepared this Dust Control Work Plan (“Work Plan”) on behalf of the Riverview-Trenton Railroad Company (“RTRR”) as required by the Corrective Action Consent Order (“CACO”) between RTRR and the Michigan Department of Environment, Great Lakes, and Energy (“EGLE”), Waste Management and Radiological Protection Division, dated November 1, 2018.

This Work Plan was completed in accordance with the CACO, Attachment A, Statement of Work (“SOW”) for the RTRR property located at 18251 West Jefferson Avenue, Riverview and Trenton, Wayne County, Michigan (“Subject Property”). The Subject Property consists of approximately 76.2 acre portion of the former McLouth Steel site in Trenton, Michigan. The Subject Property is contained in three parcels; 51009030001000, 54001010082300, and 54001990006704. The property is bounded by Trenton Channel of the Detroit River to the east; a portion of the McLouth Steel property referred to as the “County Property”, a railroad line, and West Jefferson Avenue to the west; the Grosse Ile Toll Bridge and Monguagon Creek to the north; and a portion of the former McLouth Steel site known as the County Property to the south. Further east of the property, beyond the Trenton Channel, is Grosse Ile, further west, beyond West Jefferson Avenue, is a quarry, residential, commercial and industrial property and further north, beyond Monguagon Creek, is commercial and industrial property. Figure 1 provides a Site Location Map for the Subject Property and Figure 2 provides a Site Plan. Figure 1 and Figure 2 are provided in Attachment A.

The purpose of this Dust Control Work Plan is to implement the SOW by identifying the measures that will be taken to reduce the potential for particulate emissions associated with the SOW activities at the Property (“Site Activities”). Site Activities planned for the RTRR property are limited to, site inspections, an investigation of soil and concrete at specific Waste Management Units (“WMUs”), and an investigation of the groundwater impacts across the subject property. A Groundwater Investigation Work Plan and the WMU Investigation Work Plan were prepared by ASTI and submitted under separate cover.

## **2.0 Background**

The Subject Property was used as part of an integrated steel company between the years of 1948 and 1996. Existing contamination on the Property has been identified to include manganese from grade to approximately 10 feet below ground surface in excess of the generic non-residential clean-up criteria (“GNRCCs”) for particular soil inhalation as defined by Part 201 of Michigan Act 451.

### **3.0 Scope of Work**

#### **3.1 Dust Control**

Following review of existing manganese data in surface soils, ASTI will implement the following dust control measures, if necessary.

Planned Site Activities which may create airborne dust include; vehicle movement on the Subject Property, drilling via hollow-stem augers or direct push, and soil boring installation with the use of hand augers. One haul road is present on the Subject Property as identified on Figure 3. Portions of the haul road are paved and the unpaved portion is covered with asphalt millings or coarse grain material that would not create nuisance dust with the limited travel required for planned Site Activities.

Soil excavation or movement are not required for the proposed Site Activities. Though the Site Activities are not expected to create significant airborne dust, the following best management practices (“BMPs”) will be implemented throughout the project:

- Lightly spraying work areas with water as necessary before and during dust-generating activities (truck traffic and drilling);
- While on the Property, all vehicles will maintain speeds of five miles an hour or less to minimize dust generation;
- Bulk soil transportation is not anticipated during the Site Activities; however, if material is loaded for transportation, the loads will be tarped;
- Vehicles will be decontaminated with a brush to remove dust or soil adhered to the vehicle prior to leaving the property; and
- Work will cease, or work will transition to non-dust generating activities, when sustained wind speed in excess of 40 miles per hour for a period of 5 minutes or more as measured by a proximate weather station (the weather station located at the McLouth Steel County property will be used to determine this measurement). Work will resume when the wind speed falls below 40 miles per hour for a minimum of one half hour.

Due to the minimal creation of airborne dust and use of BMPs, dust monitoring will not be required during the Site Activities. If site conditions or Site Activities change in a manner which would create excessive dust, this Work Plan will be updated accordingly.

#### **3.2 Manganese**

ASTI will review historical manganese data for the Subject Property. The results of the data review will be used to identify modifications to the dust control measures listed in Section 3.1 that are necessary to prevent unacceptable human exposure to manganese. ASTI will prepare a report to summarize the results of the review of historical manganese data. That report will identify when manganese monitoring will take place and the measures required to prevent unacceptable human exposure to manganese during future anticipated activities on the Subject Property (if required).

Site Activities are not expected to generate dust; therefore, dust monitoring for manganese is not required during this phase. Dust monitoring will be conducted if soil excavation or soil loading activities are conducted.

A copy of this Work Plan will be made available to on-site personnel. ASTI field personnel will be responsible for implementation of this Work Plan and will have the authority to implement additional dust control measures, or to stop work, based on the results of visual observations. Any deviation from this Work Plan will be recorded in the Project field notebook and communicated to the ASTI Project Manager. Any deviation which could affect the scope of work or schedule will require authorization by the ASTI Project Manager prior to implementation.

#### **4.0 Schedule**

This scope of work will be implemented immediately following EGLE's approval of this Work Plan. The Manganese data report will be available four weeks after approval of this Work Plan.

#### **5.0 Cost Estimate**

The estimated costs to implement the tasks included in this Work Plan are provided below:

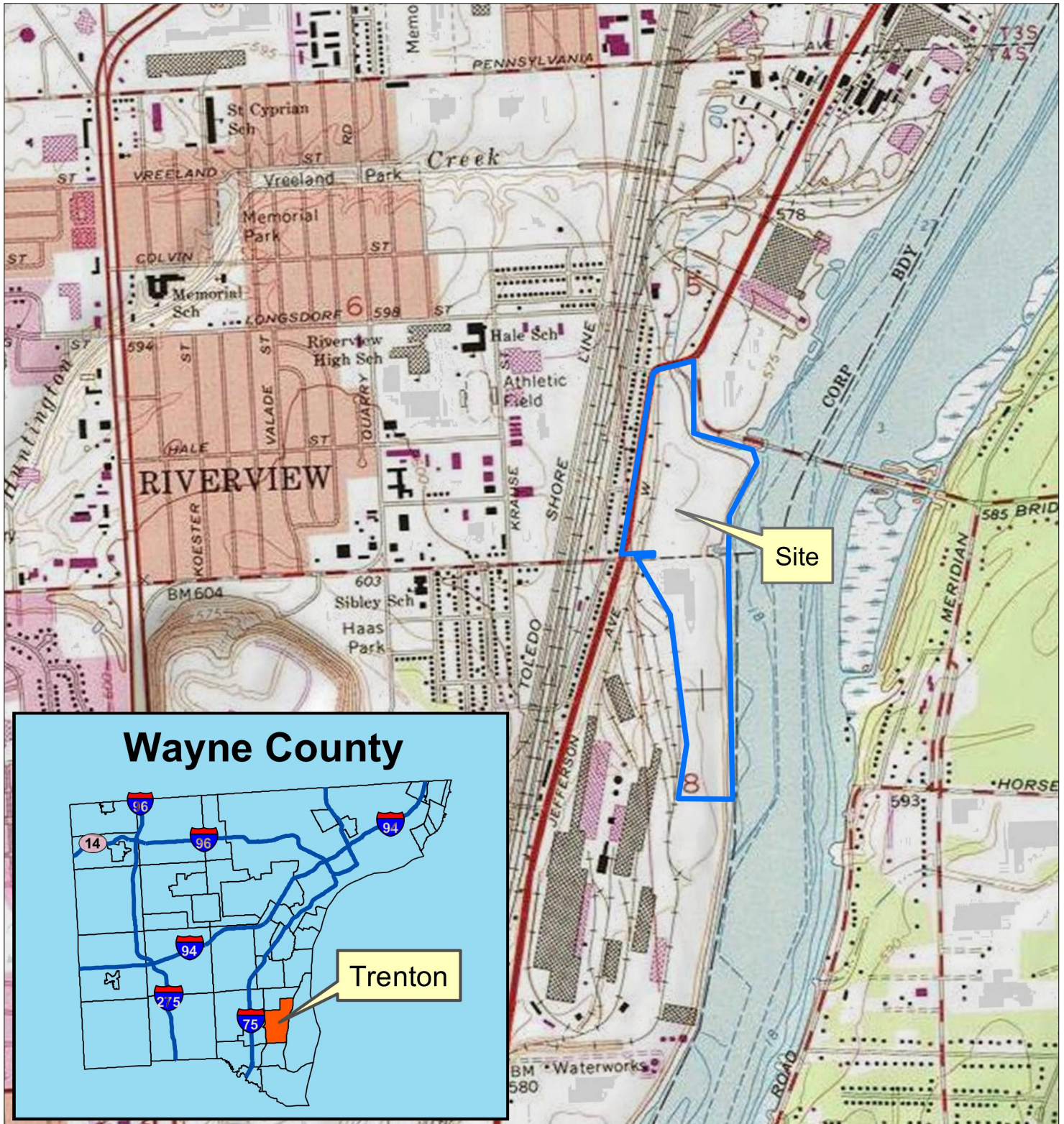
Review Manganese Data and Report	<b>\$3,800</b>
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**Attachment A**

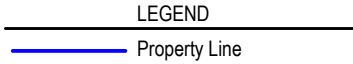
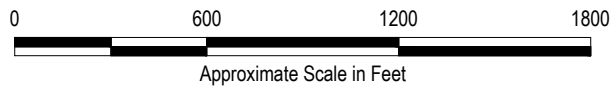
**Figures**

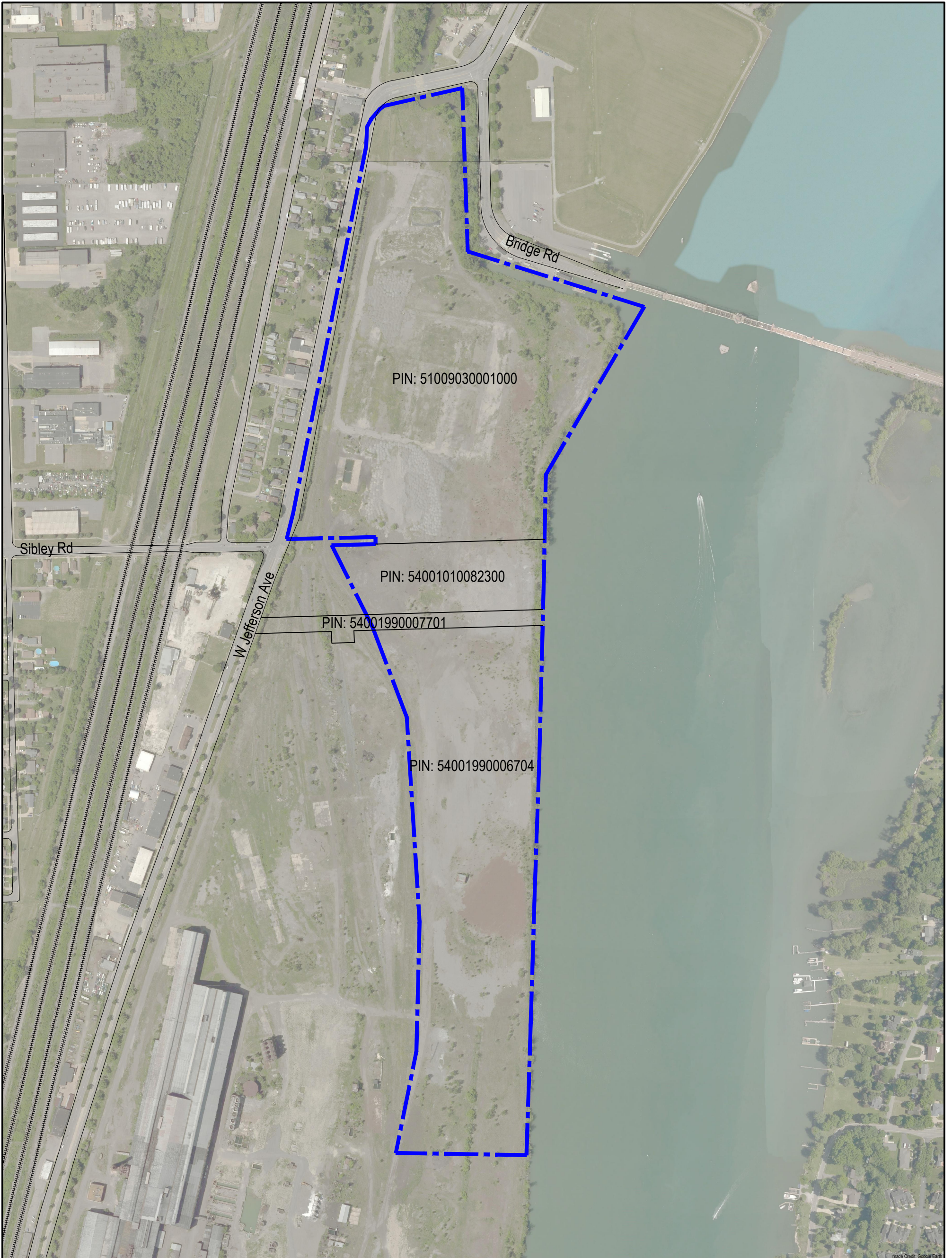
- 1 - Site Location Map**
- 2 - RTRR Property Map**
- 3 – Haul Road Location**

**Dust Control Work Plan**



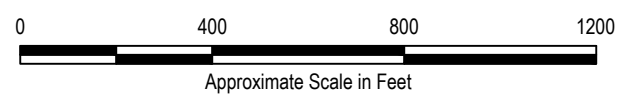
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**LEGEND**

- ▬ Subject Property
- Approx. Parcel Boundary







**LEGEND**

 Subject Property

