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Mavila

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

A778550246

FACILITY: Fort Iron and Metal Company		SRN / ID: A7785
LOCATION: 330 South Livernois, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 07/19/2019
STAFF: Stephen Weis	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance inspection of the Fort Iron and Metal Company facility on S. Livernois in Detroit. The Fort Iron facility is scheduled for inspection in FY 2019.		
RESOLVED COMPLAINTS:		

**Location:**

Fort Iron and Metal Company (A7785)  
330 South Livernois  
Detroit 48209

**Date of Activity:**

Friday, July 19, 2019

**Personnel Present:**

Steve Weis, EGLE-AQD Detroit Office

**Purpose of Activity**

A self-initiated inspection of the Fort Iron and Metal Company facility (hereinafter "Fort Iron") on South Livernois in Detroit was conducted on Friday, July 19, 2019. The Fort Iron facility was on my list of sources targeted for an inspection during FY 2019. The purpose of this inspection was to determine compliance of operations at the Fort Iron facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), and with applicable Federal standards.

**Facility Site Description**

The Fort Iron facility property is located on the west side of South Livernois between Fort Street and West Jefferson Avenue. The facility's property, which consisted of a roughly 9-acre parcel, is located to the south of the Norfolk Southern railroad tracks and right-of-way, and is bounded by South Street to the south, and South Crawford Street to the west. The property is located in Detroit's Delray neighborhood.

The Fort Iron facility property is located within the boundaries of the footprint for the Port of Entry (POE) on the United States side of the Gordie Howe International Bridge, which is in the early stages of construction. The POE boundaries are South Campbell Street to the east, South Post Street to the west, the Norfolk Southern railroad right-of-way to the north and West Jefferson Avenue to the south. The proposed POE will include approaches to and from the bridge, U.S. Customs and Border Patrol operations, and buffer areas surrounding the POE. A diagram is attached to this report that shows the proposed U.S. POE, with the location of the Fort Iron facility property highlighted, and a rendering of the multi-use paths associated with the U.S. POE, both of which show the boundaries of the POE area.

The Fort Iron property was purchased by the Michigan Department of Transportation (MDOT) as part of the Gordie Howe Bridge project. According to EGLE-AQD Asbestos Program staff, MDOT was responsible for the demolition of the building on the Fort Iron property, which would involve their submitting "Notification of Intent to Renovate/Demolish" forms to EGLE-AQD to provide notice of the demolition of the building structure, and ensuring that any asbestos containing material (ACM) associated with the building was properly addressed.

I have attached two pictures of the site – the first is a screen shot from Google Map's Street View feature that shows the Fort Iron/J&L Specialty Steel facility when the building was still standing, and the second is a photo that I took on July 19, 2019 to show the status of the property at that time with the building structure demolished

and the ground backfilled and graded. It is assumed that over time, the planned features of the POE will be constructed on the property.

### **Facility Operations**

According to a past real estate listing, the building that was located at 330 South Livernois was 381,000 square feet in area. The location was the original operating location of McLouth Steel, serving as the company's Detroit Plant. The company operated this location as a steel finishing facility for steel sheet and strip products, operating annealing and pickling lines, and slitting and polishing lines among other processes.

The location served as the headquarters for McLouth Steel until the facility was sold to Jones and Laughlin (J&L) Steel Company in 1981. J&L operated a stainless-steel cold annealing and pickling line at the facility. According to information in the facility file, J&L shut down the operations at the facility in 1998. Per correspondence that was sent to the former Wayne County Air Quality Management Division dated March 28, 2000, J&L notified of their intent to permanently cease operations at the facility, further stating that:

*"All manufacturing operations have ended. All manufacturing equipment and their respective air control equipment have been taken out of service and cleaned. The only J&L activity remaining in the plant is the removal and shipping of inventory, equipment, and supplies."*

In the time since J&L permanently ceased operations, the building was used for storage. During a visit to the facility in September of 2005 by AQD Detroit Office staff, it was noted that the process equipment that was used by J&L was either in the process of being dismantled for scrap or other use, or had already been removed from the property. At that time, the open areas of the building were being used for storage by International Specialty Tube, a company that used to operate at 260 South Crawford to the west of the Fort Iron/J&L building. The International Specialty Tube location has also been permanently shut down, and the building and property associated with it razed to make way for the Port of Entry.

A site visit in April of 2016 that I was a part of provided that at that time, the building at 330 South Livernois was owned by an entity called 330 S. Livernois LLC, who was leasing space in the building to tenants for temporary material storage. Fort Iron was a tenant in the building, utilizing space for material storage operations, specifically salt piles and ferrous mill scale that were used by Fort Iron in the company's recycling business.

As described in the last section of this report, in the time since the last site visit in 2016, the property on which the Fort Iron/J&L facility formerly operated has been cleared, and it will be incorporated into the U.S. Port of Entry for the Gordie Howe Bridge.

### **Permits/Regulations/Orders/Other**

#### **Permits**

Numerous permits were issued to McLouth and J&L addressing their operations at 330 South Livernois. Three of the permits were addressed as a result of the 2016 site visit – Wayne County permits C-7956 and 7957, which addressed a HF acid storage tank and its associated fume scrubber, and Wayne County permit C-11832, which addressed a modification to pickling tanks and put forth Title V opt-out limits, were voided. Any additional permits that were issued for any equipment at the facility's address that are found in the AQD Detroit Office permit files will be voided.

### **Compliance Determination**

Based upon the results of the July 19, 2019 site visit, the Fort Iron and Metal Company facility that was located at 330 South Livernois in Detroit has permanently ceased operation. The building structure at this location has been demolished, and going forward, this location will be part of the U.S. Port of Entry for the to-be-constructed Gordie Howe International Bridge.

Attachments to this report: maps of the Port of Entry location; pictures of 330 South Livernois showing the property when the building structure was still standing, and one showing the property as of July 19, 2019 after the building had been demolished and the land had been cleared.

NAME Steve Wiles DATE 11/5/19 SUPERVISOR JK