ECOLOGYCENTER
Healthy People, Healthy Planet

March 1, 2023

Mayor Mike Duggan
City of Detroit
2 Woodward Avenue, Suite 1126
Detroit, MI 48226

Re: Soil test results at the Detroit incinerator site

Dear Mayor Duggan,

At a press conference held on May 24, 2022, Tyrone Clifton, director of Detroit Building Authority, announced the soil at the site of the former incinerator had been tested and was found to be clear of contamination. Our office requested the soil test results and have reviewed/ analyzed the findings. **The findings reveal data gaps and chemicals of concern detected at levels which require further investigation.**

The test results prepared by DLZ, Inc on March 11, 2022 show **widespread lead contamination** with 410 ppm of lead 2-3 feet down at one site (SB-06). Findings additionally indicate **the presence of benzene, ethylbenzene, naphthalene, VOCs, and evidence of fuel dumping**. Various parts of the site were not accessible for testing. As well, it appears **DLZ did not test for two classes of contaminants known to be associated with incinerators: dioxins and PFAS.**

The executive summary of the Phase II report indicates chemical pollutant exceedances:

- “Benzene was detected in soil and groundwater at sample location SB04/TW-04 at concentrations that exceeded respective Nonresidential VIAP Screening Levels. Ethylbenzene and Naphthalene were also detected in groundwater at TW-04 at concentrations which exceeded their respective Nonresidential VIAP Screening Levels.”
- “Metals were detected in soil samples that exceeded the Statewide Default Background Level (SDBL) but did not exceed the Nonresidential Particulate Soil Inhalation Criteria (PSIC) or Nonresidential Direct Contact (DC) Criteria.”
- “...[G]roundwater at the Subject Property contains contaminants at concentrations which exceed the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Part 201 Residential Generic Cleanup Criteria and Risk-Based Screening Levels.”

The executive summary of the report refers to the sampling that was performed as “limited.” Section 2.4 of **the report cites a “significant data gap”** due to the “inability to access portions of the Subject Property” including but not limited to the southeastern switch yard.

The executive summary stated that contaminated soil was found on the northwest portion of the property that may represent a **direct contact hazard** to construction workers. DLZ suggested "compliance with relevant occupational health and safety regulations" was needed without any specific recommendations. Additionally, the DPW offices are located in the northwest portion of the property and waste haulers regularly convene outside the building before and after shifts.

The primary areas of concern appear "to be centered to the north of the Cooling Tower building and extending towards the northwest and northeast, including the northeast portion of the bulk fuel oil aboveground storage tank (AST) area, and ranged in depth from 4-6 feet below ground surface (bgs). Contamination appeared centered within the "smear zone" atop the water table in that area which was observed to be 4 feet bgs at SB-04 and 5 feet bgs at SB-06."

After reviewing the reports we find the assessment inadequate and request the following additional actions:

1. Test for persistent organic pollutants (POPs) in soil and near surface groundwater, including polychlorinated dibenzodioxins (PCDDs/dioxins), polychlorinated dibenzofurans (PCDFs/furans) and Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS). Dioxins have been identified in many studies of workers, soil and water near municipal waste incinerators.
2. Complete testing in all areas of the site, including "inaccessible areas" to fully characterize hazards on the site. Sampling should be done at increased density within the site.
3. In addition to assessing the actual incinerator site, we request the Detroit Building Authority and City of Detroit commit to evaluating and mitigating the potential impact of the historic operations and emissions on homes and soils outside of the site. Air modeling of historic emissions should be utilized to identify areas of maximum impact. These areas should be prioritized.
4. Existing employees and demolition workers at the site should be provided with accurate risk communication about the hazards present at the site. Appropriate workplace health and safety protections should be required.

Thank you for your attention to these issues. Feel free to contact us directly to discuss these concerns.

Jeff Gearhart
Research Director
Ecology Center

Melissa Cooper Sargent
Resident living near incinerator site
Environmental Health Advocate
Ecology Center