



October 14, 2020

Reference No. 11208041

Mr. Zachary Sasnow
U.S. Environmental Protection Agency, Region 5
Remediation Branch
Land, Chemicals, and Redevelopment Division
77 West Jackson Blvd., LR 16J
Chicago, Illinois
U.S.A. 60604

Transmitted Via Email

Dear Mr. Sasnow:

**Re: Semi-Annual Progress Report (April 1, 2020 to September 30, 2020)
Performance Based Administrative Order on Consent
RCRA Corrective Action
Saginaw Nodular Iron, 2100 Veterans Memorial Parkway, Saginaw, MI
U.S. EPA ID No. MID 041 793 340**

In accordance with the Performance-Based Administrative Order on Consent (Docket No. RCRA-05-2011-0023) between the U.S. Environmental Protection Agency Region 5 (U.S. EPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached semi-annual progress report for the period April 1, 2020 to September 30, 2020. Please note that on June 27, 2018, U.S. EPA approved the reduction in frequency of progress reporting from quarterly to semi-annually.

Please contact me if you would like to discuss this matter further.

Yours truly,

GHD

A handwritten signature in blue ink that reads "J. Pardys". The signature is stylized and cursive.

John-Eric Pardys, P. Eng.

JEP/kf/4

Encl. Attachment A – Semi-Annual Progress Report (April 1, 2020 to September 30, 2020)

cc: Rick Parson, EGLE (via e-mail)
Saginaw Public Library (Public Information Repository)
David Favero, RACER (via e-mail)
Michael Tomka, GHD (via e-mail)

Attachment A

Attachment A

Work Performed this Semi-Annual Period

The following work was performed during the semi-annual period April 1, 2020 to September 30, 2020 for the Nodular facility:

- Prepared and submitted semi-annual progress report on April 14, 2020 for the period October 1, 2019 to March 31, 2020.
- Submitted Secondary Pond PCB-impacted sediment removal closure report to U.S. EPA on February 11, 2020. During an update call with U.S. EPA on March 12, 2020, U.S. EPA indicated they had completed a preliminary review of the closure report and indicated they had no substantive comments. A response from U.S. EPA is anticipated via email.
- Prepared Notice of Termination request for NPDES permit and submitted the request to EGLE on April 1, 2020. Approval of the request was received on May 11, 2020 with termination effective April 23, 2020.
- Submitted monthly electronic discharge monitoring reports in accordance with NPDES Permit No. MI0059042 for March and April, as the permit was terminated April 23, 2020. There was one discharge in March associated with a rainfall event. There were no exceedances of discharge limits from Outfall 022A.
- Submitted a City of Saginaw floodplain permit application for removal of PCB-impacted soil from IU G wetlands on June 30, 2019, which was approved on July 27, 2020.
- Solicited bids for the removal of PCB-impacted soil from IU G wetlands and selected a contractor.
- Submitted an Interim Measures (TSCA) Work Plan for PCB-impacted soil removal on July 10, 2020. U.S. EPA provided approval on September 2, 2020.
- Completed activities associated with the removal of PCB-impacted soil from IU G wetlands the week of September 14, 2020 including setting up access to removal area, removal and off-Site disposal of PCB-impacted soil, placement of clean backfill, and restoration. A report is being drafted that documents the removal of PCB-impacted soil from IU G wetlands.
- Prepared draft 2021 budget request.
- Completed periodic inspections for SWPPP in March and April and collected level measurements of secondary pond and North Ditch. SWPPP no longer required as of April 23, 2020.

Data Available During this Reporting Period

- NPDES discharge sampling results for the discharges in March are provided in Attachment A.1.

Problems Encountered

None.

Summary of Problem Resolution

None.

Estimated Percent Complete and Information Summary for Selected Activities

Task		Estimated % Complete
1.	IU G – Former Nodular Iron Plant OM&M	
	<p><u>Annual EI Sampling (8-years completed to date by RACER, 2-years completed by MLC, and 3-years completed by GMC).</u> (Estimated percent complete assumes the EI monitoring program is replaced with a revised groundwater monitoring program upon approval of the CMS by U.S. EPA, anticipated to occur in 2020.)</p> <ul style="list-style-type: none"> • 2011 EI sampling was completed in November 2011 and reporting was submitted to U.S. EPA April 18, 2012. • 2012 EI sampling was completed in November 2012 and reporting was submitted to U.S. EPA March 11, 2013. • 2013 EI Sampling was completed in November 2013 and reporting was submitted to U.S. EPA February 13, 2014. • 2014 EI sampling was completed in November 2014 and reporting was submitted to U.S. EPA February 10, 2015. • 2015 EI sampling was completed in November 2015 and reporting was submitted to U.S. EPA February 10, 2016. • 2016 EI sampling was completed in November 2016 and reporting was submitted to U.S. EPA January 4, 2017. • 2017 EI sampling was completed in May 2017 and reporting was submitted to U.S. EPA December 8, 2017. • 2018 EI sampling was completed in November 2018 and reporting was submitted to U.S. EPA February 15, 2019. • 2019 EI sampling was completed in November 2019 and a report was submitted to U.S. EPA January 17, 2020. U.S. EPA responded via email on January 22, 2020 approving the modification of adding a monitoring well location to the annual Environmental Indicator (EI) groundwater monitoring program and had no further comments. 	95%
	<p><u>Additional delineation of impacts in soil</u></p> <ul style="list-style-type: none"> • Work plan for additional delineation of manganese and PCB impacts in soil in the south portion of IU G submitted to U.S. EPA on February 27, 2015 and approved by U.S. EPA on March 2, 2015. • Additional delineation of manganese and PCB impacts was completed during March and April 2015. A summary of the investigation was submitted to U.S. EPA on May 8, 2015. • Work plan for additional delineation of PCB impacts in soil above 10 mg/kg in the south portion of IU G submitted to U.S. EPA on July 15, 2015 and approved by U.S. EPA on July 30, 2015. • Additional delineation of PCB impacts above 10 mg/kg was completed in August 2015. A summary of the additional investigation of manganese and PCB impacts was submitted to U.S. EPA on February 15, 2017. U.S. EPA approved via a March 8, 2017 email the report and the recommendation to address the PCB impacts through deed restrictions as an interim measure. 	95%

Task		Estimated % Complete
	<p><u>Ammonia concentrations above MDEQ Groundwater Surface Water Interface Criteria</u></p> <ul style="list-style-type: none"> Ammonia in groundwater evaluation was submitted to U.S. EPA on April 6, 2015 and to MDEQ on April 8, 2015. 	85%
	<p><u>Ecological Screening Assessment – Isolated Wetlands</u></p> <ul style="list-style-type: none"> Conducted ecological risk assessment on some isolated wetlands formed in the 2012 time period in IU G and submitted the evaluation to U.S. EPA on January 4, 2019. The assessment concluded that there is minimal risk to ecological receptors and no further activity is required. During a conference call with U.S. EPA on the wetland assessment on September 6, 2019 U.S. EPA requested that RACER remove PCB-impacted surface soil. A scope of work for the removal of wetland PCB-impacted soil and associated permitting requirements was provided to U.S. EPA via email on September 13, 2019. U.S. EPA responded on September 19, 2019 via email to proceed with obtaining the necessary permits to complete the removal of wetland PCB-impacted soil. Submitted a Joint EGLE/USACE permit request as it relates to the removal of PCB-impacted soil from the isolated wetlands in IU G on November 20, 2019. EGLE granted the permit on January 16, 2020. Submitted a City of Saginaw floodplain permit application for removal of PCB-impacted soil from the isolated wetlands in IU G on June 30, 2020. The City of Saginaw granted the permit on July 27, 2020. Submitted an Interim Measures (TSCA) Work Plan for PCB-impacted soil removal to U.S. EPA on July 10, 2020 which was subsequently approved on September 2, 2020. Removal of PCB-impacted soil was completed the week of September 14, 2020 and included setting up access to removal area, removal and off-Site disposal of PCB-impacted soil, placement of clean backfill, and restoration. A report is being drafted that documents the removal of PCB-impacted soil from IU G wetlands. 	95%
2.	IU H – WWTP Closure	
	<p><u>Secondary Pond</u></p> <ul style="list-style-type: none"> Characterization Study on Secondary Pond completed in June of 2011. Emergency overflow for secondary pond installed on March 13, 2012. The emergency overflow was lowered approximately 6 feet on June 23, 2016. DEQ issued NPDES permit for the Site on August 24, 2012. MDEQ modified NPDES sampling requirements with most of the requested changes in RACER's January 8, 2015 request. As a result of the lowering of the emergency overflow, the modification to the NPDES sampling requirements were rescinded. Additional Characterization Studies for Secondary Pond and Lagoon 5 were completed in March 2016, May 2016, August 2016, and September 2017. A summary of the September 2017 investigation results were submitted to U.S. EPA on November 6, 2017. A sediment pore water sampling Work Plan was submitted to U.S. EPA on January 29, 2018 and was approved by U.S. EPA on March 2, 2018. Sampling was conducted on April 17, 2018. The results were presented to U.S. EPA on May 11, 2018 and a memorandum summarizing the results was submitted on June 3, 2018. U.S. EPA provided comments on the pore water sample results on June 13, 	95%

Task		Estimated % Complete
	<p>2018 and responses to comments were provided to U.S. EPA on July 3, 2018, U.S. EPA provided email approval on September 17, 2018 to proceed with removal of PCBs >50 ppm in Secondary Pond sediments and following the removal, to allow the Secondary Ponds to naturalize, and to implement appropriate institutional controls to prevent hydrologic connection between the pond and on the pond and nearby surface water.</p> <ul style="list-style-type: none"> • NPDES renewal application was prepared and submitted April 2, 2016. Comments on the application were received and responded to on July 12 and 29, 2016. A modification to the application (addition of new outfall through the eastern portion of the northern Secondary Pond berm, referred to as outfall 24) was submitted December 22, 2016. A draft of the permit was provided on July 14, 2017. Comments on the permit were provided to MDEQ on July 24, 2017. Comments were reviewed with MDEQ and a revised submission was made on September 20, 2017. MDEQ requested additional information on November 6, 2017, which was provided on November 6 and December 18, 2017. MDEQ requested on February 8, 2018 that a sample of the secondary pond be collected and submitted for analysis. The results were submitted to MDEQ on March 12, 2018. After a public review period, a new NPDES permit was issued and then became effective July 1, 2018. A notice of termination (NOT) request was prepared and submitted to EGLE on April 1, 2020. • A Draft Interim Measures Work Plan for the removal of PCB-impacted sediment was submitted to U.S. EPA on December 19, 2018, which was approved in principle by U.S. EPA on February 14, 2019. U.S. EPA requested additional detail on the work once bids had been received from the contractors. An amendment to the draft Work Plan was submitted to U.S EPA on July 16, 2019 and was approved with comments on August 5, 2019. A final copy of the executed amendment was distributed on August 20, 2019. • Activities associated with the removal of PCB-impacted sediment were completed in November 2019 and included: Site setup (access roads, decontamination pad/staging area setup, trailer), installation of berm to separate the east side of the Secondary Pond from the west, dewatering the western portion of the Secondary Pond, installation of sheet pile, removal of sediment, stabilization of sediment, placement of clean cover, off-Site disposal of sediments from Areas 1 and 2, and demobilization. A report summarizing the removal of PCB-impacted sediment from the Secondary Pond was submitted to U.S. EPA on February 11, 2020. During an update call with U.S. EPA on March 12, 2020, U.S. EPA indicated they had completed a preliminary review of the closure report and indicated they had no substantive comments. A response from U.S. EPA is anticipated via email. 	
	<p><u>Primary Basins</u></p> <ul style="list-style-type: none"> • Work plan for stabilizing primary settling basins submitted to U.S. EPA on July 31, 2012 and Work Plan approved by U.S. EPA on September 18, 2012. • Primary settling basin stabilization work was completed June 20, 2013. A construction completion report was submitted to U.S. EPA on September 4, 2013. 	100%
	<p><u>North Ditch</u></p> <ul style="list-style-type: none"> • Sampling and Analysis Plan for the North Ditch submitted to U.S. EPA on April 26, 2013 and was approved by U.S. EPA on July 8, 2013. 	95%

Task		Estimated % Complete
	<ul style="list-style-type: none"> • North Ditch Investigation and additional monitoring completed the week of July 15, 2013. The results of the investigation were submitted to U.S. EPA on October 23, 2013. • Stabilization Alternative Evaluation and Recommendation for the North Ditch was submitted to U.S. EPA on February 26, 2014. • Obtain necessary permits/agreements to perform stabilization work <ul style="list-style-type: none"> – Joint permit was received on August 19, 2015. – Floodplain permit application was prepared and submitted to the City of Saginaw on May 4, 2015. – Other permits needed include: County of Saginaw soil erosion and sedimentation control permit. – Other agreements: access from adjacent property owners. • Conducted ecological risk assessment on the North Ditch consistent with the approach for the Secondary Pond, as an alternative to implementing the stabilization work, and submitted the evaluation to U.S. EPA on March 14, 2019. The assessment concluded that no further activity was required in the North Ditch, beyond some additional sampling for black carbon. U.S. EPA provided comments on the assessment and agreed that additional sampling should be completed. • An Additional North Ditch Sediment Sampling Work Plan was submitted on September 11, 2019 to U.S. EPA. U.S. EPA provided comments on September 19, 2019 to which responses were prepared and submitted on September 26, 2019. A final revised Work Plan was submitted and approved by U.S. EPA on November 6, 2019. • Additional North Ditch sediment sampling was completed in December 2019 and the results, including an update to the ecological risk assessment, were submitted to U.S. EPA on February 12, 2020. U.S. EPA provided their approval of “no further work” required in the North Ditch on February 27, 2020. 	
3.	IU I- Area Closure	
	<u>Classified Sand Pile</u> <ul style="list-style-type: none"> • Removed all classified sand pile as part of the primary basin stabilization work in 2013. 	100%
	<u>Slag Area</u> <ul style="list-style-type: none"> • During a Site inspection in April 2019, two small areas in the southern portion of IU were identified as having slag. On September 19, 2019 a Scope of Work was submitted to U.S. EPA to evaluate potential impacts of slag on surrounding soils in IU I. U.S. EPA provided comments on September 24, 2019. A final revised Work Plan was submitted and approved by U.S. EPA on October 18, 2019. • Conducted incremental soil sampling in December 2019 and submitted the results on March 10, 2020. U.S. EPA responded on March 13, 2020 indicating they had no further comments. 	100%
4.	IU I – Staging Area OM&M	NA
	<ul style="list-style-type: none"> • No activities proposed or pending at this time. 	

Task		Estimated % Complete
	<p>Environmental Indicator (EI) groundwater monitoring program and had no further comments on the submittal.</p> <ul style="list-style-type: none"> • Submit updated RFI Summary Report to U.S. EPA – May not be necessary per discussion with USEPA on January 30, 2020. • Submitted Draft Corrective Measures Proposal to U.S. EPA on April 1, 2013 • Submit revised Corrective Measures Proposal – May not be necessary per discussion with USEPA on January 30, 2020. • Submitted Summary of WMU status to U.S. EPA on January 22, 2015 and to MDEQ on January 26, 2015. MDEQ approved the closure of Nodular Iron Oil House RCRA Hazardous Waste Area in a letter dated May 8, 2016. With that closure all historical WMUs have been closed by MDEQ. • Respond to comments from U.S. EPA (when received) based on on-going review of Site Corrective Action information – To be determined (TBD). • Prepare and Record Declaration of Restrictive Covenant – TBD. • Prepare Corrective Measures Implementation Plan – TBD. • Prepare Final Remedy Construction Completion Report – TBD. • Prepare Request for RCRA Corrective Action Complete with Controls – TBD. 	
	<p>Other Related Reporting</p> <ul style="list-style-type: none"> • Submit monthly DMRs. 	On-going

Summary of Contacts with Interested Parties

- There are periodic discussions with local representatives regarding the status of remediation at the Site and potential redevelopment possibilities and options.

Projected Work for Next Reporting Period (October 1, 2020 through March 31, 2021)

- Finalize 2021 Annual Environmental Action Budget Request.
- Review, discuss and respond to any comments received as a result of USEPA's review of Site Corrective Action information.
- Submit summary of PCB-impacted soil removal activities from IU G wetlands.
- Conduct 2020 EI groundwater sampling.
- Provide support to U.S. EPA during its preparation of a Statement of Basis and the Final Decision process.
- Review current monitoring well network and prepare proposal for well abandonments.

Attachment A.1

EDMR Reports

No Discharge

Parameter	Quantity or Loading	Units	Quality or Concentration	Units	Sample Freq	Sample Type		
Flow 50050 Final Effluent (1)	Sample Measurement	0.0194	0.0194	****	****	****	Weekly	Report Total Daily Flow
	Permit Requirement	(Report) Maximum Monthly Average	(Report) Maximum Daily	****	****	****	Weekly	Report Total Daily Flow
Total Suspended Solids 00530 Final Effluent (1)	Sample Measurement	****	****	****	7	7	mg/L	See Permit Requirements 3-Portion Composite
	Permit Requirement	****	****	****	35 Maximum Monthly Average	70 Maximum Daily		See Permit Requirements 3-Portion Composite
Outfall Observation 84130 Final Effluent (1)	Sample Measurement	Yes	****	****	****	****	****	Weekly Visual
	Permit Requirement	(Report) Yes/No	****	****	****	****	****	Weekly Visual
pH 00400 Final Effluent (1)	Sample Measurement	****	****	7.8	****	7.8	SU	Weekly Grab
	Permit Requirement	****	****	6.5 Minimum Daily	****	9.0 Maximum Daily		Weekly Grab
Turbidity 00070 Final Effluent (1)	Sample Measurement	****	****	****	*g	*g	NTU	See Permit Requirements Grab
	Permit Requirement	****	****	****	80 Maximum Monthly Average	160 Maximum Daily		See Permit Requirements Grab

General Report Comments General Report Comments

No Discharge

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Parameter	Flow 50050	Total Suspended Solids 00530	Outfall Observation 84130	pH 00400	pH 00400	Turbidity 00070
Stage	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)
Limit	(Report) MGD	70 mg/L	(Report) yes/no	6.5 SU	9.0 SU	160 NTU
Stat Base	Maximum Daily	Maximum Daily	Yes/No	Minimum Daily	Maximum Daily	Maximum Daily
3/1/2020						
3/2/2020						
3/3/2020						
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3/31/2020	0.0194	7	yes	7.8	7.8	*g

General Report Comments General Report Comments