

## Chambers, Danielle

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**From:** Pardys, John-Eric  
**Sent:** Tuesday, October 07, 2014 8:09 AM  
**To:** Nemani, Nate  
**Cc:** Tomka, Mike; 'Dave Favero'; Hoevemeyer, Steven; Project Email Filing; 'Kaelber-Matlock, Sue (DEQ)'; Grant Trigger  
**Subject:** Third Quarter 2014 Progress Report, Nodular, RACER Trust ~COR-058502~  
**Attachments:** 058502Nemani-21-Third Quarter 2014 Progress Report.pdf

Nate

On behalf of RACER, please find attached the Third Quarter 2014 progress report for Nodular, for you use.

Steve, please drop off a copy at the library.

Thanks JE

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October 7, 2014

Reference No. 058502

Mr. Nate Nemani  
U.S. Environmental Protection Agency, Region 5  
Waste Management Division  
77 West Jackson Blvd., LU-9J  
Chicago, IL 60604-3590

***Transmitted via E-mail***

Dear Mr. Nemani

Re: Third Quarter 2014 Progress Report  
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

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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 progress report for the third quarter of 2014 (July 1, 2014 through September 30, 2014).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

JEP/kf/21

Encl. Attachment A – Third Quarter 2014 Progress Report

cc: Sue Kaelber-Matlock, MDEQ (via E-mail)  
Saginaw Public Library (Public Information Repository)  
David Favero, RACER (via e-mail)

# **Attachment A**

**Third Quarter 2014 Progress Report  
Performance-Based Administrative Order on Consent  
Former Saginaw Nodular Iron, Saginaw, MI  
July 1, 2014 to September 30, 2014**

## **ATTACHMENT A**

### **Work Performed this Quarter**

The following work was performed during the third quarter of 2014 at the Nodular facility:

- Prepared and submitted the second quarter progress report for 2014 on July 9, 2014.
- Prepared and submitted pre-application (for MDEQ/US Army Corp. joint permit) meeting request and supporting materials for proposed work on the North Ditch on August 13, 2014.
- Scheduled pre-application meeting for October 1, 2014 for proposed work on the North Ditch.
- Submitted payment of Hazardous Waste free for 2013 and initiated discussion with MDEQ and U.S. EPA regarding remaining Waste Management Units (WMUs) on August 19, 2014.
- Began preparation of draft 2015 budget request.
- Submitted monthly electronic discharge monitoring reports for NPDES permit. There were no discharges during this reporting period.
- Completed periodic inspections for SWPPP and level measurements of secondary pond.

### **Data Available During this Quarter**

- None.

### **Problems Encountered**

- None.

### **Summary of Problem Resolution**

- None.

## Estimated Percent Complete and Information Summary for Selected Activities

<u>Task</u>	<u>Estimated % Complete</u>
<p>1. IU G – FORMER NODULAR IRON PLANT OM&amp;M</p> <p><u>Annual EI Sampling (3-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 Long-term groundwater monitoring program upon approval of the CMP by U.S. EPA by 2016)</p> <ul style="list-style-type: none"> <li>• 2011 EI sampling was completed in November 2011 and reporting was submitted to U.S. EPA April 18, 2012</li> <li>• 2012 EI sampling was completed in November 2012 and reporting was submitted to U.S. EPA March 11, 2013</li> <li>• 2013 EI Sampling was completed in November 2013 and reporting was submitted to U.S. EPA February 13, 2014</li> </ul>	60%
<p>2. IU H – WWTP CLOSURE</p> <p><u>Secondary Pond</u></p> <ul style="list-style-type: none"> <li>• Characterization Study on Secondary Pond completed in June of 2011</li> <li>• Emergency overflow for secondary pond installed on March 13, 2012</li> <li>• Discharge of water under NPDES permit to maintain freeboard in the secondary pond until October 2016 when the NPDES permit expires. Prior to permit termination, RACER will evaluate and provide a proposal to U.S. EPA and MDEQ regarding the need for further sampling or other action.</li> </ul>	70%
<p><u>Primary Basins</u></p> <ul style="list-style-type: none"> <li>• 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</li> <li>• Primary settling basin stabilization work was completed June 20, 2013. A construction completion report was submitted to U.S. EPA on September 4, 2013</li> </ul>	100%

<u>Task</u>	<u>Estimated % Complete</u>
<u>North Ditch</u> <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> <li>• Stabilization Alternative Evaluation and Recommendation for the North Ditch was submitted to U.S. EPA on February 26, 2014</li> <li>• Obtain necessary permits to perform work</li> <li>• Implement approved plan</li> </ul>	35%
3. <u>IU I- AREA CLOSURE</u> <u>Classified Sand Pile</u> <ul style="list-style-type: none"> <li>• Removed all classified sand pile as part of the primary basin stabilization work</li> </ul>	100%
4. <u>IU I – STAGING AREA OM&amp;M</u> <ul style="list-style-type: none"> <li>• No activities are proposed at this time</li> </ul>	NA
5. <u>OTHER – RCRA CORRECTIVE ACTION REPORTING AND OTHER RELATED REPORTING</u> <u>Budget Process</u> <ul style="list-style-type: none"> <li>• U.S. EPA approved the 2012 EA Budget Authorization Request on December 22, 2011</li> <li>• U.S. EPA approved the 2012 Annual EA Budget Amendment No. 1 on September 19, 2012</li> <li>• U.S. EPA approved the 2013 EA Budget Authorization Request on January 3, 2013</li> <li>• U.S. EPA approved the 2014 EA Budget Authorization Request on November 22, 2013</li> </ul>	On-going
<u>RCRA Corrective Action Reporting</u> <ul style="list-style-type: none"> <li>• Submitted CCR documentation to U.S. EPA on November 18, 2011</li> <li>• Submitted Supplemental RFI Report on September 28, 2012</li> <li>• Submitted Draft Corrective Measures Proposal to U.S. EPA on April 1, 2013</li> <li>• Prepare response to comments from U.S. EPA on the Supplemental RFI and CMP</li> <li>• Prepare Declaration of Restrictive Covenant</li> <li>• Prepare Corrective Measures Implementation Plan</li> <li>• Prepare Final Remedy Construction Completion Report</li> </ul>	60%

<u>Task</u>	<u>Estimated % Complete</u>
<u>Other Related Reporting</u>	
<ul style="list-style-type: none"> <li>• DEQ issued NPDES permit for the Site on August 24, 2012</li> <li>• Submit monthly DMRs</li> </ul>	<p>100%</p> <p>On-going</p>

### **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**

- Participate in pre-consultation meeting with the MDEQ to discuss permitting requirements for the work proposed in the North Ditch.
- Prepare draft 2015 annual EA budget authorization request, discuss with U.S. EPA, finalize and obtain approval.
- Prepare required permit submittals.
- Meet with U.S. EPA to discuss and/or prepare responses to any U.S. EPA comments on the Supplemental RFI Report and Draft CMP.
- Evaluate status of former regulated units and coordinate approach for final resolution with U. S. EPA and MDEQ.
- Complete periodic inspections per the SWPPP and level measurements of secondary pond.
- Perform discharge event from secondary pond if necessary.