



December 22, 2016

Reference No. 058502

Ms. Christine Aiello
Michigan Department of Environmental Quality
Permits Section – Water Resource Division
525 West Allegan
P.O. Box 30457
Lansing, MI 48909

Transmitted via E mail

Dear Ms. Aiello:

**Re: Revised Submission
NPDES Reissuance (Submission #2DM-ZEC4-66B7)
Saginaw Nodular Iron, 2100 Veterans Memorial Parkway, Saginaw, MI**

The following letter and corresponding attachments has been prepared by GHD on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust to revise RACER Trust/GHD's National Pollutant Discharge Elimination System (NPDES) industrial/commercial application form (reissuance) request for RACER's Nodular Industrial Land (Site) in Saginaw, MI. The NPDES reissuance request was initially submitted on April 2, 2016 and revised and resubmitted on July 12, 2016 based on comments received by the MDEQ on June 30, 2016. This revision includes the addition of a new outfall (Outfall 024) and the corresponding revised files associated with the NPDES reissuance request. The following Attachments are included as part of the revised NPDES reissuance request.

Attachment A – Redline version of Attachment 1 – Narrative Descriptions - outfalls

Attachment B – Revised Site Figure

The purpose of adding the new outfall (Outfall 024) is to allow for controlled discharge from the east portion of the secondary pond, in the event the secondary pond is subdivided to assist in remediating the secondary pond sediments or if the water level in the pond needs to be lowered more rapidly than would otherwise occur through the current outfall (021).

The following summarizes the changes that were made to the application:

- Revised Attachment 1 – Narrative Description – outfalls, to include a description of the new outfall (A clean copy will be uploaded to the miwaters website and a redline of the changes is included in Attachment A to this letter)
- Revised Site Figure, to include the location of the new outfall (See Attachment B)
- Under Section IIIA. Facility Information – Industrial / Commercial Facilities, subpart A.3 Discharge Types, revised table column 1, row 7 from, “Regulated Storm Water (Outfall 021)” to “Regulated Storm Water (Outfall 021 and 024)”



- Under Section IIIB. Outfall Information – Industrial / Commercial Facilities, added information for new Outfall 024, which will include the same information as Outfall 021, with the exception of the Outfall Number or Id, the Outfall Location, and the Outfall description.

Should you have any questions, please do not hesitate to contact me.

Yours truly,

GHD

A handwritten signature in black ink that reads "J. Pardys". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

John-Eric Pardys, P.Eng.

JEP/kf/3

cc: David Favero, RACER (via e-mail)
Michael Tomka, GHD (via e-mail)

Attachment A
Redline Version of Attachment 1 -
Narrative Descriptions - outfalls

NARRATIVE DESCRIPTION

GENERAL INFORMATION

It is noted that as of ~~July 14~~December 16, 2016, there are efforts in progress to sell the southwest portion of this Site, which has frontage to Veterans Memorial Parkway. This permit renewal application is being submitted based on the assumption that the sale of the property will not be completed. Should that sale of the southwest portion of the Site be completed or should remediation of the sediment be necessary, it is possible that there would be modifications to the drainage area (Secondary Pond) for Outfall 21 and to Outfall 21 itself (see further details below under Proposed Modifications). Should these modifications be desired/necessary, ~~the~~MDEQ will be kept informed of the proposed plans and RACER will provide supplemental information or prepare a revised NPDES Permit Renewal Application, if necessary.

RACER obtained MDEQ approval (see Attachment 7) to lower the elevation of the discharge pipe for Outfall 21 by approximately five feet. The discharge pipe was lowered on June 24, 2016. An upward facing riser pipe with 1-foot removable sections was installed on the inlet to ensure the intake, while lowering the water level, is located near the surface of the water in the secondary pond (to limit solids in the discharge). As a result of the modification to Outfall 21, previous modifications approved by the MDEQ to the frequency and analysis of sampling were rescinded, which is documented in a letter from the MDEQ provided on June 15, 2016 (see Attachment 7).

Lowering the elevation of the discharge pipe will be documented in the Storm Water Pollution Prevention Plan (SWPPP) and Annual Report.

FIGURE 1

Figure 1 presents the Site Map ~~for the facility~~. Please note that the treatment plant and associated basins stopped receiving process water in November 2010 and the only water inputs to the Site include storm water that falls on the Site and within the respective outfall drainage basins.

There are currently two outfalls that are strictly storm water outfalls and therefore are not included in the current NPDES permit. Please note that details for these two outfalls are included in the SWPPP. These outfalls continue to be strictly storm water outfalls and therefore are not included in this renewal application:

- Outfall 20 (to Diekman Drain) Note that the drainage basin for this outfall includes property that is owned by other parties in addition to RACER.
- Outfall 23 Drainage pipe that drains the railway ditches to Koehler Drain. Note that the drainage basin for this outfall includes property owned by other parties in addition to RACER.

There are currently two outfalls that are included in the existing NPDES permit and are included in this renewal application:

- Outfall 21 - discharge from the secondary pond to unnamed ditch to the north, which flows into the Gage Drain, and ultimately drains to the Saginaw River.
- Outfall 22 - located off of RACER property, south of the entrance to Tri-cap, east of Veterans Memorial Parkway, which drains the North Ditch area and outlets to the Saginaw River. Note that the drainage basin for this outfall includes property that is owned by other parties in addition to RACER.

RACER is proposing one new outfall be added to the NPDES permit:

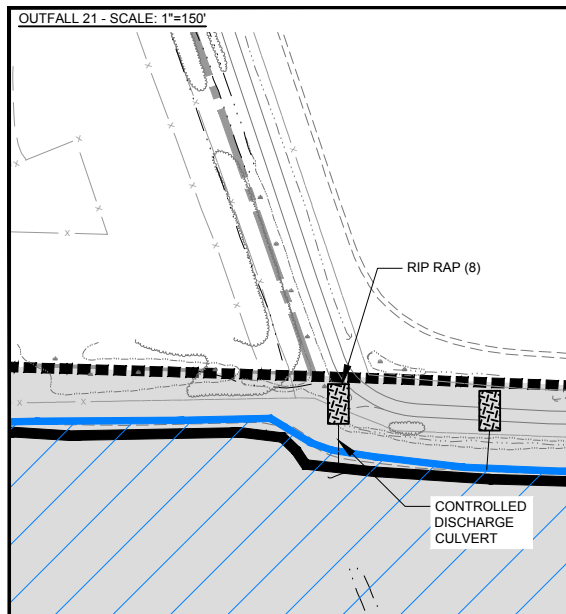
- Outfall 24 - discharge from the secondary pond to unnamed ditch to the north, which flows into the Gage Drain, and ultimately drains to the Saginaw River.

PROPOSED MODIFICATIONS

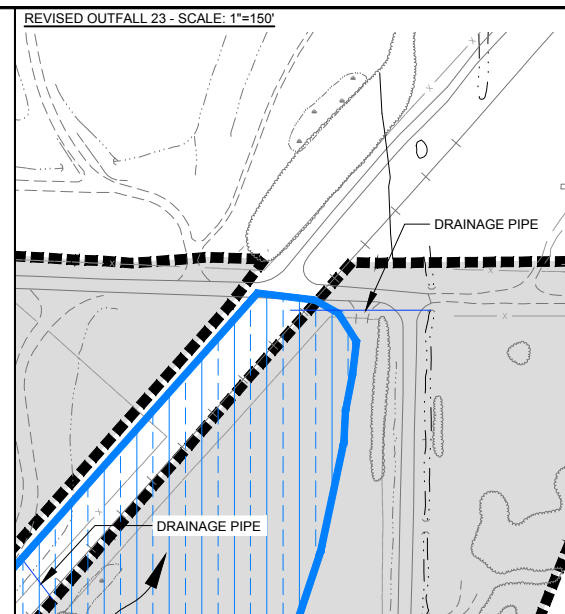
- Outfall 21 – RACER is currently evaluating options to remediate sediments in the Secondary Pond, which may affect Outfall 21. Possible modifications to Outfall 21 include: possible short-term increases of the discharge rate of 5 MGD, lowering the elevation of Outfall 21 again to further lower the water elevation in the Secondary Pond; and constructing a new uncontrolled outfall (upon completion of remedial activities). The short term increases to the discharge rate would possibly occur during periods when RACER plans to conduct evaluations on the secondary pond sediments or when RACER plans to conduct remedial activities on the sediments, as necessary. The duration of the short term increases to the discharge rate will be dependent on the activity and will potentially range from weeks to 2-3 months. At this time RACER does not have a schedule for when additional sediment evaluations or remedial activities will be completed. MDEQ will be informed of any proposed modifications to Outfall 21.
- Outfall 24 – RACER is currently evaluating options to remediate sediments in the Secondary Pond. As such, a new 1-ft diameter PVC pipe was installed in the embankment of the secondary pond (approximately 250 feet to the east of Outfall 21 and at approximately the same elevation) with a control valve to allow for controlled discharge from the east portion of the secondary pond in the event the secondary pond is subdivided to assist in remediating the secondary pond sediments or if the water level in the pond needs to be lowered more rapidly than would otherwise occur through Outfall 21. To date, the secondary pond has not been subdivided and therefore, the quality of the water that would be discharged through Outfall 24 is expected to be the same as that has been discharged through Outfall 21.
- Outfall 22 - RACER has obtained MDEQ Water Resources Division Permit (15-73-0003-P) that provides for modifying the drainage in the North Ditch area and the existing inlet from the North Ditch area to the catch basin that provides for discharge to the Saginaw River. The proposed plans involve: removing the standing water in the North Ditch; covering impacted sediments in the North Ditch; installing a new catch basin on RACER property in the North Ditch that would connect via a subsurface pipe to the existing catch basin that ~~transmits~~provides discharge to the Saginaw River, and grading the ditch so that storm water gravity flows to the new catch basin on RACER property in the North Ditch. Note that RACER is working with the adjacent property owners within the Outfall 22 drainage basin to obtain needed approvals to complete this work. From the remediation perspective, USEPA Region 5 RCRA Corrective Action program also approved the proposed modifications to the North Ditch. A schedule to complete the North Ditch work is to be determined.

Following completion of the North Ditch work, RACER proposes to collect samples from three separate discharge events with the intent of demonstrating that storm water continues to meet discharge limits. Pending the receipt and review of the analytical results, RACER would petition the MDEQ to classify Outfall 22 as strictly a storm water outfall and thereby remove the Outfall 22 from the NPDES permit. Upon MDEQ approval of this outfall as strictly a storm water outfall, the modifications would be incorporated into the SWPPP, as well as, an NPDES permit modification request, if necessary.

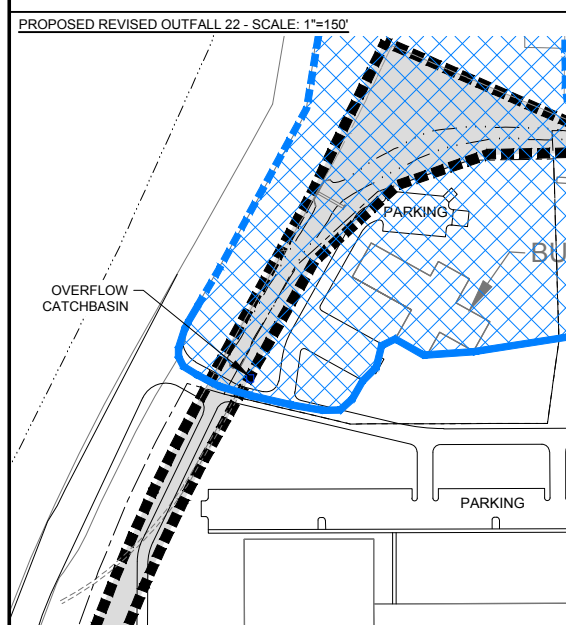
Attachment B Revised Site Figure



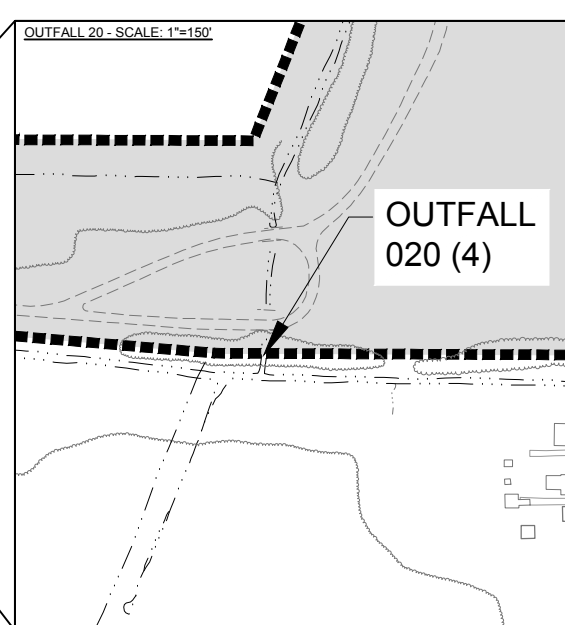
OUTFALL 021 AND
OUTFALL 024(4)
(CONTROLLED
OVERFLOW FOR
SECONDARY POND)



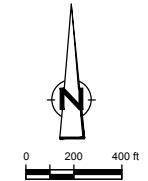
REVISED OUTFALL 023 (4)



OUTFALL 022 (4)
(NORTH DITCH OVERFLOW)



OUTFALL
020 (4)



- LEGEND**
- APPROXIMATE LIMITS OF RACER PROPERTY
 - DRAINAGE AREA 1 (46.7 ACRES)
 - DRAINAGE AREA 2 (5.2 ACRES)
 - DRAINAGE AREA 3 (37.9 ACRES)
 - DRAINAGE AREA 4 (12.9 ACRES)
 - FLOW DIRECTION

DRAINAGE SUMMARY

STORMWATER IN DRAINAGE AREA 1 OVERLAND FLOWS FROM THE SOUTHWEST TO THE NORTHEAST. AN EMERGENCY OVERFLOW FROM THE SECONDARY POND HAS BEEN INSTALLED THAT DISCHARGES INTO A DITCH TO THE NORTH.

STORMWATER IN DRAINAGE AREA 2 OVERLAND FLOWS TO THE DITCH ALONG THE WEST SIDE OF THE RAILROAD TRACKS WHICH DRAINS TO THE NORTHEAST INTO KOEHLER DRAIN.

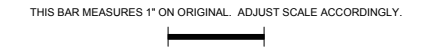
STORMWATER IN DRAINAGE AREA 3 OVERLAND FLOWS TO THE DITCHES ALONG THE RAILROAD TRACKS. A DRAINAGE PIPE DIRECTS THE STORMWATER BENEATH THE RAILROAD TRACK TO THE DITCH ON THE EAST SIDE OF OUTER DRIVE WHICH DRAINS TO THE NORTH INTO KOEHLER DRAIN.

STORMWATER IN DRAINAGE AREA 4, TO THE NORTH, FROM THE WWTP IS COLLECTED IN TWO STORM SEWERS AND ONE DITCH WHICH OUTLET INTO THE NORTH DITCH. ALL OTHER STORMWATER THAT FALLS ON DRAINAGE AREA 4 FLOWS OVERLAND AND COLLECTS IN THE NORTH DITCH BEFORE BEING DISCHARGED FROM OUTFALL 022 INTO A STORM SEWER THAT OUTLETS TO THE SAGINAW RIVER.

1. Buildings and other permanent structures
2. Storage or Disposal areas for significant materials
3. Secondary containment structures and descriptions of what they contain (NONE)
4. Storm water discharge outfalls
5. Location of storm water and non-storm water inlets contributing to each outfall (NONE)
6. Location of NDPEs permitted discharges other than storm water (NONE)
7. Outlines of the drainage areas contributing to each outfall
8. Structural runoff controls or storm water treatment facilities
9. Areas of vegetation (SEE FIGURE 2)
10. Areas of exposed and/or erodible soils (SEE FIGURE 2)
11. Impervious Surfaces (SEE FIGURE 2)
12. Name and location of receiving waters
13. Areas of known or suspected impacts on surface waters as designated under Part 201 (Environmental Response) of the Michigan Act (NONE)

NOTE: TOPO - SANBORN, 1996

SCALE VERIFICATION



REVITALIZING AUTO COMMUNITIES
ENVIRONMENTAL RESPONSE (RACER)
SAGINAW NODULAR INDUSTRIAL LAND
SAGINAW, MICHIGAN

SITE MAP
FOR SWPPP



Source Reference: MICHIGAN STATE PLANE SOUTH, NAD 83 USING INTERNATIONAL FEET, NGVD 88			
Project Manager: M.T.	Reviewed By: J.E.P.	Date: MARCH 2016	
Scale: 1" = 400'	Project N°: 58502-T02	Report N°: 013	Drawing N°: 1