



**CONESTOGA-ROVERS  
& ASSOCIATES**

14496 Sheldon Road, Suite 200, Plymouth, Michigan 48170  
Telephone: (734) 453-5123 Fax: (734) 453-5201  
[www.CRAworld.com](http://www.CRAworld.com)

January 8, 2015

Reference No. 058502

Mr. Brian Rudolph  
Saginaw Bay District Supervisor  
Michigan Department of Environmental Quality  
401 Ketchum Street, Suite B  
Bay City, Michigan 48708-5430

***Transmitted via E-mail***

Dear Mr. Rudolph

Re: Request for Reduction of NPDES Monitoring  
NPDES Permit No: MI0059042  
Saginaw Nodular Industrial Land, 2100 Veterans Memorial Parkway, Saginaw, MI

On behalf of Revitalizing Auto Communities Environmental Response (RACER), Conestoga-Rovers & Associates (CRA) has prepared this letter requesting a reduction in the monitoring frequency at Outfall 021A and Outfall 22A at the Saginaw Nodular Industrial Land Site located in Saginaw, Michigan (Site), in accordance with Part 1, Section A, No.3 of the Michigan Department of Environmental Quality (MDEQ) National Pollutant Discharge Elimination System (NPDES) Permit MI0059042. The locations of Outfalls 021A and Outfall 022A are presented on Figure 1.

Currently, RACER is required to sample discharges from Outfalls 021A and 022A daily during discharge. This letter requests a reduction in sampling frequency to weekly during discharge in accordance with Part 1, Section A, No.3 of the NPDES permit.

The source of any discharge to each outfall is limited to precipitation run-off and there are no industrial activities being conducted at the Site in the catchment areas for either outfall. The outfalls were required to be permitted as a result of residual impacts in the ditch sediments and pond sediments that remained from historical industrial operations.

Discharge sample results from Outfall 021A (Secondary Pond) since obtaining the NPDES permit is summarized in Table 1. Please note there were three minor exceedances of permitting limits in the eleven samples that were collected.



January 8, 2014

Reference No. 058502

- 2 -

- The result from the discharge on April 3, 2013 for dissolved oxygen was outside the permitted limit (6.0 milligrams per liter [mg/L] – minimum) at 5.54 mg/L. The value is marginally below the acceptable permitted limit and the overall average dissolved oxygen for discharges to date is 7.82 mg/L, which is well within the acceptable dissolved oxygen levels. Please note that the discharge is from a pond and as such, it is not unexpected that the DO levels would be low in early spring since the pond would be covered by snow/ice through the winter reducing the DO.
- The result from the discharge on May 8, 2014 for pH was outside the acceptable permitted range (6.5 to 9.0) at 6.29. The value is marginally below the acceptable permitted pH range and the overall average pH for discharges to date (6.81) is within the acceptable permitted pH range. Please recall that the winter weather in early 2014 extended longer than normal and that the discharge is from a pond and as such, it is not unexpected that the pH levels would be low in early spring since the pond would be covered by snow/ice through the winter reducing the pH.
- Results from the discharge on May 23, 2014 for CBOD<sub>5</sub> were above the acceptable level (7.2 mg/L) at 8.5 mg/L. The value is marginally above the acceptable level and the overall average for discharges to date (3.1 mg/L) is well within the acceptable CBOD<sub>5</sub> levels.

Discharge sample results from Outfall 022A (North Ditch) since obtaining the NPDES permit is summarized in Table 2. There have been no exceedances of the permitted limits in the three samples that have been collected to date and the results are well within the permitted discharge range.

Based on no industrial activities being conducted at the Site and the discharge information provided, CRA requests on behalf of RACER that the discharge monitoring frequency be reduced to weekly during discharge events for both outfalls.



**CONESTOGA-ROVERS  
& ASSOCIATES**

January 8, 2014

Reference No. 058502

- 3 -

Should you have any questions or require additional information, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

JEP/kf/1

Encl. Figure 1 – Outfall Locations  
Table 1 – Outfall 021A Discharge Results  
Table 2 – Outfall 022A Discharge Results

cc: Keith Noble, MDEQ (via E-mail)  
David Favero, RACER (via e-mail)

TABLE 1

**OUTFALL 021A DISCHARGE RESULTS  
SAGINAW NODULAR INDUSTRIAL LAND  
SAGINAW, MI**

<b>Location:</b>	<b>Outfall 021A</b>	<b>Outfall 021A</b>	<b>Outfall 021A</b>	<b>Outfall 021A</b>
<b>Sample date:</b>	<b>05/23/14 07:45</b>	<b>5/8/13 7:40</b>	<b>5/7/13 7:40</b>	<b>4/25/13 17:00</b>
<b>Sampler:</b>	<b>Steve Hoevemeyer</b>	<b>Steve Hoevemeyer</b>	<b>Steve Hoevemeyer</b>	<b>Steve Hoevemeyer</b>
<b>Sample ID:</b>	<b>W-052314-58502-SSH-285</b>	<b>W-58502-050813-SSH-272</b>	<b>W-58502-050713-SSH-271</b>	<b>W-58502-042513-SSH-270</b>

<u>Parameters</u>	<u>Units</u>	<u>Limits</u>				
Total Suspended Solids	mg/l	35	4.00	4.00 U	4.00 U	5.00
CBOD5	mg/l	(1)	<b>8.50</b>	2.00 U	2.00 U	2.00 U
Ammonia N	mg/l	(1)	0.20	0.20	0.23	0.42
<b>Field Parameters</b>						
Dissolved Oxygen	mg/l	6 (min)	6.77	7.81	7.82	8.08
Turbidity	NTU	160	2.10	2.75	2.96	7.32
Field pH		between 6.5 and 9.0	6.59	<b>6.29</b>	6.62	7.21
Total discharged	gallons	1680000	620000	310000	770000	601000
Approximate duration of discharge	hours	--	24	24	24	24

## Notes:

**8.5** - a bolded value indicates a parameter exceeding NPDES discharge limits

U - indicates the analyte was analyzed but not detected

GPD - gallons per day

(1) Acceptable values for CBOD5 and Ammonia-N are provided below

	<u>CBOD5</u>	<u>Ammonia-N</u>
May - September	7.2	2.5
October - November	13	5.8
December - March	28	10
April	<b>39</b>	(report)

TABLE 1

**OUTFALL 021A DISCHARGE RESULTS  
SAGINAW NODULAR INDUSTRIAL LAND  
SAGINAW, MI**

<b>Location:</b>	<b>Outfall 021A</b>	<b>Outfall 021A</b>	<b>Outfall 021A</b>	<b>Outfall 021A</b>
<b>Sample date:</b>	<b>4/24/2013 16:20</b>	<b>4/23/2013 16:20</b>	<b>4/22/2013 16:20</b>	<b>4/19/2013 15:00</b>
<b>Sampler:</b>	<b>Steve Hoevemeyer</b>	<b>Steve Hoevemeyer</b>	<b>Steve Hoevemeyer</b>	<b>Steve Hoevemeyer</b>
<b>Sample ID:</b>	<b>W-58502-042413-SSH-269</b>	<b>W-58502-042313-SSH-268</b>	<b>W58502-042213-SSH-267</b>	<b>W58502-041913-SSH-266</b>

<u>Parameters</u>	<u>Units</u>	<u>Limits</u>				
Total Suspended Solids	mg/l	35	8.00	9.00	6.00	4.00 U
CBOD5	mg/l	(1)	2.00 U	2.70	2.00 U	7.00
Ammonia N	mg/l	(1)	0.41	0.42	0.50	0.5
<b>Field Parameters</b>						
Dissolved Oxygen	mg/l	6 (min)	8.45	7.86	8.56	8.78
Turbidity	NTU	160	6.91	7.34	9.17	9.23
Field pH		between 6.5 and 9.0	7.3	7.28	6.88	6.93
Total discharged	gallons	1680000	311000	620000	1080000	721000
Approximate duration of discharge	hours	--	24	24	24	24

## Notes:

**8.5** - a bolded value indicates a parameter exceeding NPDES discharge limits

U - indicates the analyte was analyzed but not detected

GPD - gallons per day

(1) Acceptable values for CBOD5 and Ammonia-N are provided below

	<u>CBOD5</u>	<u>Ammonia-N</u>
May - September	7.2	2.5
October - November	13	5.8
December - March	28	10
April	<b>39</b>	(report)

TABLE 1

**OUTFALL 021A DISCHARGE RESULTS  
SAGINAW NODULAR INDUSTRIAL LAND  
SAGINAW, MI**

<b>Location:</b>	<b>Outfall 021A</b>	<b>Outfall 021A</b>	<b>Outfall 021A</b>
<b>Sample date:</b>	<b>4/17/2013 8:10</b>	<b>4/16/2013 8:10</b>	<b>04/03/13 08:15</b>
<b>Sampler:</b>	<b>Steve Hoevemeyer</b>	<b>Steve Hoevemeyer</b>	<b>Steve Hoevemeyer</b>
<b>Sample ID:</b>	<b>W-58502-041713-SSH-265</b>	<b>W-58502-041613-SSH-2644</b>	<b>SW-040313-58502-SSH-263</b>

<u>Parameters</u>	<u>Units</u>	<u>Limits</u>			
Total Suspended Solids	mg/l	35	8.00	6.00	4.00 U
CBOD5	mg/l	(1)	2.00 U	2.00 U	2.00 U
Ammonia N	mg/l	(1)	0.56	0.65	0.96
<b><u>Field Parameters</u></b>					
Dissolved Oxygen	mg/l	6 (min)	8.14	8.16	<b>5.54</b>
Turbidity	NTU	160	5.16	6.04	3.99
Field pH		between 6.5 and 9.0	6.61	6.68	6.56
Total discharged	gallons	1680000	946000	859000	308000
Approximate duration of discharge	hours	--	24	24	24

## Notes:

**8.5** - a bolded value indicates a parameter exceeding NPDES discharge limits

U - indicates the analyte was analyzed but not detected

GPD - gallons per day

(1) Acceptable values for CBOD5 and Ammonia-N are provided below

	<u>CBOD5</u>	<u>Ammonia-N</u>
May - September	7.2	2.5
October - November	13	5.8
December - March	28	10
April	<b>39</b>	(report)

TABLE 2

**OUTFALL 022A DISCHARGE RESULTS  
SAGINAW NODULAR INDUSTRIAL LAND  
SAGINAW, MI**

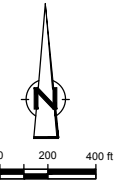
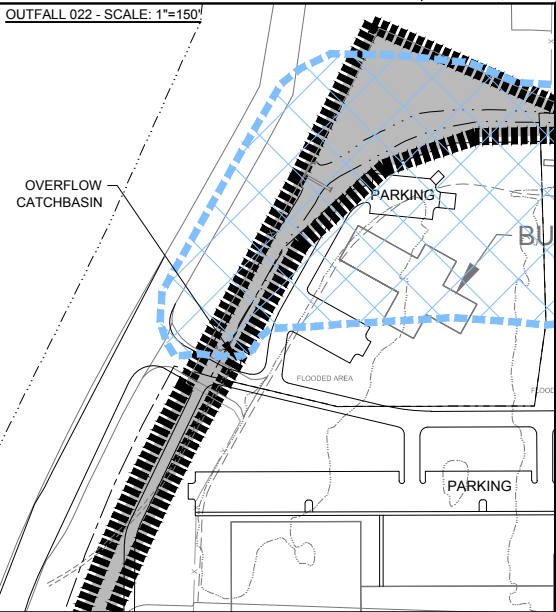
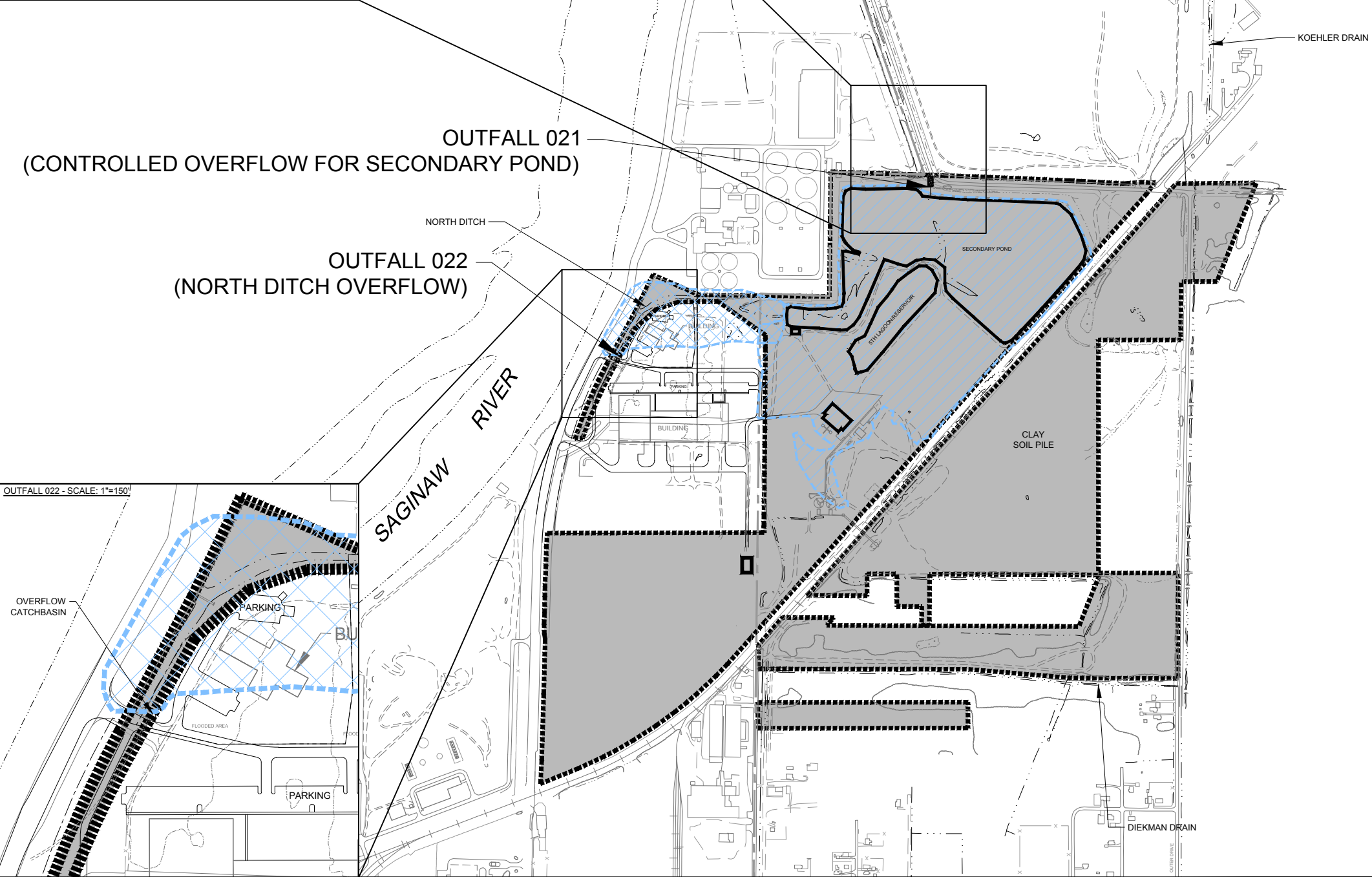
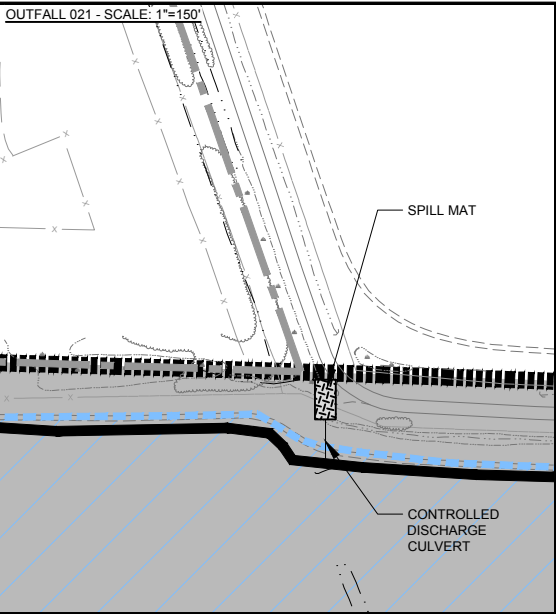
<b>Location:</b>	<b>Outfall 022A</b>	<b>Outfall 022A</b>	<b>Outfall 022A</b>
<b>Sample date:</b>	<b>11/26/14 08:00</b>	<b>05/16/14 08:35</b>	<b>04/14/14 08:35</b>
<b>Sampler:</b>	<b>Steve Hoevemeyer</b>	<b>Steve Hoevemeyer</b>	<b>Steve Hoevemeyer</b>
<b>Sample ID:</b>	<b>W-58502-112614-SSH-14011</b>	<b>W-58502-051614-SSH-284</b>	<b>W-58502-041414-SSH-283</b>

<u>Parameters</u>	<u>Units</u>	<u>Limits</u>			
Total Suspended Solids	mg/l	35	4.00 U	4.00 U	5.00
pH		between 6.5 and 9.0	7.70	7.75	7.60
Total discharged	gallons	no limit	2400	96000	21600
Approximate duration of discharge	hours	--	24	16	16

## Notes:

U - indicates the analyte was analyzed but not detected

GPD - gallons per day



- LEGEND
- APPROXIMATE LIMITS OF RACER PROPERTY
  - APPROXIMATE CATCHMENT AREA FOR OUTFALL 021
  - APPROXIMATE CATCHMENT AREA FOR OUTFALL 022

NOTE: TOPO - SANBORN, 1996

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

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

SAGINAW, MICHIGAN

OUTFALL  
LOCATIONS



Source Reference: MICHIGAN STATE PLANE SOUTH, NAD 83 USING INTERNATIONAL FEET, NGVD 88			
Project Manager: M.T.	Reviewed By: J.E.P.	Date: JANUARY 2015	
Scale: 1" = 400'	Project N°: 58502-T02	Report N°: RUDO001	Drawing N°: 1