



**CONESTOGA-ROVERS  
& ASSOCIATES**

651 Colby Drive, Waterloo, Ontario, N2V 1C2  
Telephone: (519) 884-0510 Fax: (519) 884-0525  
[www.CRAworld.com](http://www.CRAworld.com)

January 10, 2012

Reference No. 058502

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

**Transmitted Via Email**

Dear Mr. Nemani:

Re: Fourth Quarter 2011 Progress Report  
Performance-Based Administrative Order On Consent  
RCRA Corrective Action  
Saginaw Nodular Iron, 2100 Veterans Memorial Parkway, Saginaw, MI  
USEPA 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 (USEPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report (Attachment A) for the fourth quarter of 2011 (October 1, 2011 through December 31, 2011).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

MRT/ev/7  
Encl.

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

## ATTACHMENT A

### FOURTH QUARTER 2011 PROGRESS REPORT PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT FORMER SAGINAW NODULAR IRON, SAGINAW, MI OCTOBER 1, 2011 TO DECEMBER 31, 2011

#### WORK PERFORMED THIS QUARTER

The following work was conducted during the fourth quarter at the Nodular facility:

- Preparation and submittal of third quarter progress report for 2011 on October 13, 2011
- Preparation and submittal of draft 2012 budget request, scope and schedule on October 28, 2011 and submittal of final budget on December 12, 2011
- Preparation and submittal of letter to fulfill the requirement in the performance-based AOC to submit a CCR on November 18, 2011
- Conducted CA 750 EI groundwater sampling event the first week of November 2011
- Collection and initial evaluation of characterization study of secondary pond area
- On-going inspections of the WWTP buildings, secondary pond water levels
- Approval of 2012 Annual budget by EPA on December 22, 2011
- Preparation and submittal of letter to fulfill the requirement in the performance-based AOC to submit an Environmental Indicators Report on December 29, 2011

#### DATA AVAILABLE DURING THIS QUARTER

- None

#### PROBLEMS ENCOUNTERED

- None

#### SUMMARY OF PROBLEM RESOLUTION

- NA

#### POTENTIAL PROBLEMS

- None

**ESTIMATED PERCENT COMPLETE AND INFORMATION  
SUMMARY FOR SELECTED ACTIVITIES**

---

<i>Task</i>	<i>Estimated % Complete</i>
1. IU G - Former Nodular Iron Plant OM&M - 3-years of EI sampling complete - 2011 EI sampling completed, data pending - 2012 EI sampling event scheduled for November	10%
2. IU H - WWTP Closure - Characterization Study on Secondary Pond ongoing - Preliminary preparation of IM work plan for the primary lagoons - On-going secondary pond water level measurements - Initiate development of alternatives to close secondary pond in consultation with U.S. EPA	5%
3. IU I - Area Closure	0%
4. IU I - Staging Area OM&M	0%
5. Preparation of RFI report	5%

**SUMMARY OF CONTACTS WITH INTERESTED PARTIES**

- None

**CHANGES IN PERSONNEL**

- None

**PROJECTED WORK FOR NEXT REPORTING PERIOD**

- Finalize and submit initial evaluation of characterization study of secondary pond area
- Finalize 2011 EI sampling letter
- Prepare summaries of meetings, data reviews, or conference calls with U.S. EPA, as appropriate
- Prepare the First Quarter 2012 Progress Report
- Submittal of IM work plan to close primary lagoons
- Preparation of alternatives to obtain closure for the secondary pond
- Discuss RFI submittal details with U.S. EPA and continue preparation of draft RFI