

JAMES J. BLANCHARD, Governor
DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
500 W. WISCONSIN
LANSING, MICHIGAN 48208

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David F. Hales, Director

September 26, 1988

Mr. William Hudson
Environmental Coordinator
GMC - Saginaw Nodular Iron Plant
2100 Veterans Memorial Parkway
Saginaw, Michigan 48605-5073

Dear Mr. Hudson:

Subject: Saginaw Modular Iron
Calcium Carbide Slag Units
MID 04: 793 340

In response to our meeting on August 15, 1988, with Steve Song of your staff, and your letter of July 21, 1988, we are summarizing the six issues discussed in the letter and at the meeting. The issues are summarized in the order corresponding to the numbered items in your letter. The following points were agreed upon:

1. The analysis of all the calcium carbide constituents and indicator parameters listed in Tables 6-1 and 7-1 will be performed. If non-hazardous constituents are detected, the company may resample for confirmation purposes.
2. It was agreed that total metals analysis is sufficient to determine the extent of contamination for closure purposes. However, if soil total metals concentrations are not EP toxic, but are above background, the soils may be disposed in your Type III Crow Island landfill if the criteria for an inert designation are met. The soils must be disposed at a Type II landfill if the criteria for an inert designation cannot be met. The water leachate (Kach) test only needs to be done if you seek an inert designation.
3. Due to past practices at the site which may have impacted areas outside the regulated waste management units, soil will be sampled at all of the locations identified in the approved closure plans, not at the locations proposed in the July amendments.
4. Soil samples (cores) for analysis will be taken at the ground surface, near the soil/water table interface, and at the foundry slag sand/clay interface.

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5. If statistically significant soil contamination, as defined on pages 36 and 37 of the approved closure plans, is found in the bottom two saturated zone soil samples from the boreholes, the groundwater could be potentially impacted and groundwater monitoring must be implemented as described in Section 7 of the approved closure plans.
6. If groundwater monitoring is necessary, then groundwater samples will be collected and analyzed for the constituents listed in Table 7-1 in accordance with Section 7, Ground Water Monitoring, of the approved closure plans. Placement of the monitoring wells must be approved by a Waste Management Division geologist. The results of the statistical evaluation of the groundwater monitoring data must be submitted.

If you have any questions, please contact me.

Sincerely,

Andrea P. Schoenrock
Waste Management Division
(517) 373-2730

cc: Ms. Marilyn Sebadaszka, USEPA
Mr. Wayde Hartwick, USEPA
Mr. Ken Burda/C&E File
Mr. Jim Sygo, MDNR
Ms. Liz Browne, MDNR

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