



**CONESTOGA-ROVERS  
& ASSOCIATES**

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January 13, 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: Fourth Quarter 2013 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

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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 (USEPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for the fourth quarter of 2013 (October 1, 2013 through December 31, 2013).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

JEP/kf/17

Encl. Attachment A – Fourth Quarter 2013 Progress Report

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

ATTACHMENT A

FOURTH QUARTER 2013 PROGRESS REPORT  
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT  
FORMER SAGINAW NODULAR IRON, SAGINAW, MI  
OCTOBER 1, 2013 TO DECEMBER 31, 2013

## ATTACHMENT A

### WORK PERFORMED THIS QUARTER

The following work was performed during the fourth quarter of 2013 at the Nodular facility:

- Prepared and submitted the third quarter progress report for 2013 on October 10, 2013
- Prepared and submitted North Ditch Characterization results on October 23, 2013
- Participated in Site meeting with U.S. EPA on November 6, 2013
- Performed annual EI monitoring on November 12, 2013
- Finalized 2014 EA Budget Request on November 14, 2013
- Submitted monthly electronic discharge monitoring report for NPDES permit
- Completed periodic inspections for SWPPP and level measurements of secondary pond
- Continued preparation evaluation of alternatives for the stabilization of the North Ditch

### DATA AVAILABLE DURING THIS QUARTER

- North Ditch Investigation and additional groundwater monitoring results submitted on October 23, 2013
- Annual EI monitoring results (to be submitted under separate cover)

### PROBLEMS ENCOUNTERED

- None

### SUMMARY OF PROBLEM RESOLUTION

- None

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

<u>Task</u>	<u>Estimated % Complete</u>
1. IU G – Former Nodular Iron Plant OM&M	35%
<ul style="list-style-type: none"><li>• 3-years of EI sampling complete</li><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 completed in November 2013</li></ul>	

ATTACHMENT A

<u>Task</u>	<u>Estimated % Complete</u>
<p>2. IU H – WWTP Closure</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>• 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>• Bid documents and stabilization work plan for primary settling basins completed</li> <li>• Primary settling basin stabilization work was completed June 20, 2013.</li> <li>• Developed and continued to evaluate alternatives for addressing the North Ditch</li> <li>• Sampling and Analysis Plan for the North Ditch submitted to U.S. EPA on April 26, 2013</li> <li>• North Ditch Investigation and additional monitoring completed the week of July 15, 2013</li> </ul>	60%
<p>3. IU I- Area Closure</p> <ul style="list-style-type: none"> <li>• Removed all classified sand pile as part of the primary basin stabilization work</li> </ul>	90%
<p>4. IU I – Staging Area OM&amp;M</p>	0%
<p>5. Other – RCRA Corrective Action Reporting and Other Related Reporting</p> <ul style="list-style-type: none"> <li>• EPA approved the 2012 EA Budget Authorization Request on December 22, 2011</li> <li>• EPA approved the 2012 Annual EA Budget Amendment No. 1 on September 19, 2012</li> <li>• EPA approved the 2013 EA Budget Authorization Request on January 3, 2013</li> <li>• EPA approved the 2014 EA Budget Authorization Request on November 22, 2013</li> <li>• Submitted CCR documentation to U.S. EPA on November 18, 2011</li> </ul>	60%

## ATTACHMENT A

<u>Task</u>	<u>Estimated % Complete</u>
<ul style="list-style-type: none"><li>• DEQ issued NPDES permit for the Site on August 24, 2012</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></ul>	

### SUMMARY OF CONTACTS WITH INTERESTED PARTIES

- Communication regarding potential sale and future use of property with local community governmental and economic development representatives continues. A meeting with the Mayor of Saginaw and representatives of Saginaw Futures (economic development organization) was held on December 10, 2013.

### PROJECTED WORK FOR NEXT REPORTING PERIOD

- Finalize and submit memorandum summarizing evaluation of alternatives and proposing an alternative for stabilizing the North Ditch
- Meet with U.S. EPA to discuss and/or prepare responses to U.S. EPA comments on the proposed alternative for stabilizing the North Ditch
- 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
- Begin preparation of Declaration of Restrictive Covenant
- Complete periodic inspections per the SWPPP and level measurements of secondary pond
- Perform discharge event from secondary pond if necessary