



April 15, 2019

Reference No. 058502

Mr. Zachary Sasnow
U.S. Environmental Protection Agency, Region 5
Waste Management Division
77 West Jackson Blvd., LU 9J
Chicago, Illinois
U.S.A. 60604 3590

Transmitted Via Email

Dear Mr. Sasnow:

**Re: Semi-Annual Progress Report (October 1, 2018 to March 31, 2019)
Performance Based Administrative Order on Consent
RCRA Corrective Action
Saginaw Nodular Iron, 2100 Veterans Memorial Parkway, Saginaw, MI
U.S. EPA 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 (U.S. EPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached semi-annual progress report for the period October 1, 2018 to March 31, 2019. Please note that on June 27, 2018, U.S. EPA approved the reduction in frequency of progress reporting from quarterly to semi-annually.

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

Yours truly,

GHD

John-Eric Pardys, P. Eng.

JEP/kf/2

Encl. Attachment A – Semi-Annual Progress Report (October 1, 2018 to March 31, 2019)

cc: Rick Parson, MDEQ (via e-mail)
Saginaw Public Library (Public Information Repository)
David Favero, RACER (via e-mail)
Michael Tomka, GHD (via e-mail)

Attachment A

Attachment A

Work Performed this Quarter

The following work was performed during the semi-annual period October 1, 2018 to March 31, 2019 for the Nodular facility:

- Prepared and submitted semi-annual progress report on October 12, 2018 for the period April 1 to September 30, 2018.
- Submitted a memorandum on October 15, 2018 evaluating Site groundwater data compared to current MDEQ (2013) Part 201 criteria and the DRAFT MDEQ (2017) Part 201 criteria.
- U.S. EPA approved the 2019 budget request on November 23, 2018.
- Submitted responses on November 26, 2018 to U.S. EPA comments dated August 31, 2018 regarding the Site soil evaluation.
- Conducted annual EI monitoring event on November 27 and 28, 2018 and submitted the results to U.S. EPA on February 15, 2019. Additional groundwater samples were also collected from on-Site wells to confirm current conditions in accordance with the groundwater evaluation submitted on October 15, 2018. The results will be submitted under a separate cover.
- Submitted draft Interim Measure Work Plan for the Removal of PCB-impacted Sediment from the Secondary Pond to U.S. EPA on December 19, 2018.
- Submitted ecological screening assessment of the isolated wetland formed in the 2012 time period in IU G to U.S. EPA on January 4, 2019.
- Updated Stormwater Pollution Prevention Plan (SWPPP) in January 2019.
- Submitted annual SWPPP annual review in January 2019.
- Submitted ecological screening assessment of the North Ditch to U.S. EPA on March 14, 2019.
- Submitted monthly electronic discharge monitoring reports for the NPDES permit. There was one discharge in March from Outfall 022A (North Ditch). There were no exceedances of discharge limits.
- Received U.S. EPA approval on February 14, 2019 of the December 19, 2018 Interim Measures Work Plan for the Removal of PCB-impacted Sediment.
- Began preparation of request for proposal documents to solicit bids for the removal of PCB-impacted sediment from the Secondary Pond
- Initiated contact with MDEQ to obtain necessary permits for PCB-impacted sediment removal in the Secondary Pond.
- Completed periodic inspections for SWPPP and collected level measurements of secondary pond and North Ditch.

Data Available During this Quarter

- NPDES discharge sampling will be posted by April 20, 2019 for discharges in March 2019. A copy of the electronic discharge monitoring reports will be provided in the next semi-annual progress report.
- Additional groundwater sampling was completed at the Site on November 27 and 28, 2018. The results will be submitted under a separate cover.

Problems Encountered

None.

Summary of Problem Resolution

None.

Estimated Percent Complete and Information Summary for Selected Activities

Task		Estimated % Complete
1.	IU G – Former Nodular Iron Plant OM&M	
	<p><u>Annual EI Sampling (7-years completed to date by RACER, 2-years completed by MLC, and 3-years completed by GMC).</u> (Estimated percent complete assumes the EI monitoring program is replaced with a revised groundwater monitoring program upon approval of the CMS by U.S. EPA, anticipated to occur in 2019.)</p> <ul style="list-style-type: none"> • 2011 EI sampling was completed in November 2011 and reporting was submitted to U.S. EPA April 18, 2012. • 2012 EI sampling was completed in November 2012 and reporting was submitted to U.S. EPA March 11, 2013. • 2013 EI Sampling was completed in November 2013 and reporting was submitted to U.S. EPA February 13, 2014. • 2014 EI sampling was completed in November 2014 and reporting was submitted to U.S. EPA February 10, 2015. • 2015 EI sampling was completed in November 2015 and reporting was submitted to U.S. EPA February 10, 2016. • 2016 EI sampling was completed in November 2016 and reporting was submitted to U.S. EPA January 4, 2017. • 2017 EI sampling was completed in May 2017 and reporting was submitted to U.S. EPA December 8, 2017. • 2018 EI sampling was completed in November 2018 and reporting was submitted to U.S. EPA February 15, 2019. 	95%
	<p><u>Additional delineation of impacts in soil</u></p> <ul style="list-style-type: none"> • Work plan for additional delineation of manganese and PCB impacts in soil in the south portion of IU G submitted to U.S. EPA on February 27, 2015 and approved by U.S. EPA on March 2, 2015. • Additional delineation of manganese and PCB impacts was completed during March and April 2015. A summary of the investigation was submitted to U.S. EPA on May 8, 2015. • Work plan for additional delineation of PCB impacts in soil above 10 mg/kg in the south portion of IU G submitted to U.S. EPA on July 15, 2015 and approved by U.S. EPA on July 30, 2015. • Additional delineation of PCB impacts above 10 mg/kg was completed in August 2015. A summary of the additional investigation of manganese and PCB impacts was submitted to U.S. EPA on February 15, 2017. U.S. EPA approved via a March 8, 2017 email the report and the recommendation to address the PCB impacts through deed restrictions as an interim measure. 	95%

Task		Estimated % Complete
	<p><u>Ammonia concentrations above MDEQ Groundwater Surface Water Interface Criteria</u></p> <ul style="list-style-type: none"> Ammonia in groundwater evaluation was submitted to U.S. EPA on April 6, 2015 and to MDEQ on April 8, 2015. 	85%
	<p><u>Ecological Screening Assessment – Isolated Wetlands</u></p> <ul style="list-style-type: none"> Conducted ecological risk assessment on some isolated wetlands formed in the 2012 time period in IU G and submitted the evaluation to U.S. EPA on January 4, 2019. The assessment concluded that there is minimal risk to ecological receptors and no further activity is required. U.S. EPA is reviewing. 	75%
2.	IU H – WWTP Closure	
	<p><u>Secondary Pond</u></p> <ul style="list-style-type: none"> Characterization Study on Secondary Pond completed in June of 2011. Emergency overflow for secondary pond installed on March 13, 2012. The emergency overflow was lowered approximately 6 feet on June 23, 2016. DEQ issued NPDES permit for the Site on August 24, 2012. MDEQ modified NPDES sampling requirements with most of the requested changes in RACER’s January 8, 2015 request. As a result of the lowering of the emergency overflow, the modification to the NPDES sampling requirements were rescinded. Additional Characterization Studies for Secondary Pond and Lagoon 5 were completed in March 2016, May 2016, August 2016, and September 2017. A summary of the September 2017 investigation results were submitted to U.S. EPA on November 6, 2017. A sediment pore water sampling Work Plan was submitted to U.S. EPA on January 29, 2018 and was approved by U.S. EPA on March 2, 2018. Sampling was conducted on April 17, 2018. The results were presented to U.S. EPA on May 11, 2018 and a memorandum summarizing the results was submitted on June 3, 2018. U.S. EPA provided comments on the pore water sample results on June 13, 2018 and responses to comments were provided to U.S. EPA on July 3, 2018, U.S. EPA provided email approval on September 17, 2018 to proceed with removal of PCBs >50 ppm in Secondary Pond sediments and following the removal, to allow the Secondary Ponds to naturalize, and to implement appropriate institutional controls to prevent hydrologic connection between the pond and on the pond and nearby surface water. NPDES renewal application was prepared and submitted April 2, 2016. Comments on the application were received and responded to on July 12 and 29, 2016. A modification to the application (addition of new outfall through the eastern portion of the northern Secondary Pond berm, referred to as outfall 24) was submitted December 22, 2016. A draft of the permit was provided on July 14, 2017. Comments on the permit were provided to MDEQ on July 24, 2017. Comments were reviewed with MDEQ and a revised submission was made on September 20, 2017. MDEQ requested additional information on November 6, 2017, which was provided on November 6 and December 18, 2017. MDEQ requested on February 8, 2018 that a sample of the secondary pond be collected and submitted for analysis. The results were submitted to MDEQ on March 12, 2018. After a public review period, a new NPDES permit was issued and then became effective July 1, 2018. 	55%

Task		Estimated % Complete
	<ul style="list-style-type: none"> A Draft Interim Measures Work Plan for the removal of PCB-impacted sediment was submitted to U.S. EPA on December 19, 2018, which was approved in principle by U.S. EPA on February 14, 2019. U.S. EPA requested additional detail on the work once bids had been received from the contractors. Discharge of water under NPDES permit to facilitate expected work in the Secondary Pond. 	
	<p><u>Primary Basins</u></p> <ul style="list-style-type: none"> 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. Primary settling basin stabilization work was completed June 20, 2013. A construction completion report was submitted to U.S. EPA on September 4, 2013. 	100%
	<p><u>North Ditch</u></p> <ul style="list-style-type: none"> Sampling and Analysis Plan for the North Ditch submitted to U.S. EPA on April 26, 2013 and was approved by U.S. EPA on July 8, 2013. North Ditch Investigation and additional monitoring completed the week of July 15, 2013. The results of the investigation were submitted to U.S. EPA on October 23, 2013. Stabilization Alternative Evaluation and Recommendation for the North Ditch was submitted to U.S. EPA on February 26, 2014. Obtain necessary permits/agreements to perform work <ul style="list-style-type: none"> Joint permit was received on August 19, 2015. Floodplain permit application was prepared and submitted to the City of Saginaw on May 4, 2015. Other permits needed include: County of Saginaw soil erosion and sedimentation control permit. Other agreements: access from adjacent property owners. Implement approved plan (pending). Conducted ecological risk assessment on the North Ditch consistent with the approach for the Secondary Pond and submitted the evaluation to U.S. EPA on March 14, 2019. The assessment concluded that no further activity was required in the North Ditch, beyond some additional sampling for black carbon. 	50%
3.	IU I- Area Closure	
	<p><u>Classified Sand Pile</u></p> <ul style="list-style-type: none"> Removed all classified sand pile as part of the primary basin stabilization work in 2013. 	100%
4.	IU I – Staging Area OM&M	NA
	<ul style="list-style-type: none"> No activities proposed or pending at this time. 	

Task		Estimated % Complete
	<ul style="list-style-type: none"> • Submitted Summary of WMU status to U.S. EPA on January 22, 2015 and to MDEQ on January 26, 2015. MDEQ approved the closure of Nodular Iron Oil House RCRA Hazardous Waste Area in a letter dated May 8, 2016. • Respond to comments from U.S. EPA (when received) on the Supplemental RFI and CMP – To be determined (TBD). • Prepare and Record Declaration of Restrictive Covenant – TBD. • Prepare Corrective Measures Implementation Plan – TBD. • Prepare Final Remedy Construction Completion Report – TBD. • Prepare Request for RCRA Corrective Action Complete with Controls – TBD. 	
	Other Related Reporting <ul style="list-style-type: none"> • Submit monthly DMRs. 	On-going

Summary of Contacts with Interested Parties

- There are periodic discussions with local representatives regarding the status of remediation at the Site and potential redevelopment possibilities and options.

Projected Work for Next Reporting Period (October 1, 2018 through March 31, 2019)

- Follow-up responses/activities from Site meeting with U.S. EPA on April 4, 2019, including inspection of areas not accessible during Site tour.
- Finalize submission of additional groundwater sampling results
- Review current monitoring well network and prepare proposal for well abandonments.
- Solicit contractor to complete PCB-impacted sediment removal from the Secondary Pond.
- Prepare and submit additional detail on the proposed methods for removing PCB-impacted sediment removal from the Secondary Pond.
- Prepare responses to or meet with U.S. EPA to discuss any comments received on submittals, including the ecological risk assessments for the wetlands and the North Ditch.
- Lower water level in the Secondary Pond to facilitate removal of PCB-impacted sediment
- Conduct removal and off-Site disposal of PCB-impacted sediment from the Secondary Pond.
- Initiate preparation of the 2020 Annual Environmental Action Budget Request.
- Evaluate the appropriate time to update and submit a revised CMP.
- Complete periodic Site inspections per the SWPPP and measure water levels in the Secondary Pond.
- Perform discharge events from secondary pond, if necessary, and complete any necessary monitoring required by the NPDES permit.