



DRAFT MEMORANDUM

To: Richard Conforti, MDEQ, Cheryl Howe, MDEQ REF. No.: 058502

FROM: John-eric Pardys/kf/10 DATE: January 21, 2015

CC: Nate Nemani, U.S. EPA, Michael Tomka (CRA),
Dave Favero (RACER)

RE: **RACER Waste Management Unit Status, Saginaw Nodular Industrial Land**

The following memorandum presents a summary of Revitalizing Auto Community Environmental Response's (RACER's) understanding of the current status of the Resource Conservation Recovery Act (RCRA) Hazardous Waste Management Units (WMUs) located on RACER's Saginaw Nodular Industrial Land Site in Saginaw, Michigan (Site). The Site was previously a portion of a larger facility owned by General Motors Corporation (GMC) called the Saginaw Metal Casting Operations (SMCO) Facility, which was split between General Motors LLC and RACER as a result of the GMC bankruptcy. Figure 1 highlights the portions of the larger SMCO Facility that since March 31, 2011 have been owned by RACER and presents all seven WMU locations identified in the Description of Current Conditions (August 1995) document. For the purposes of this memorandum only the WMUs owned by RACER (3, 4, 5, and 7) are being reviewed.

Historical documents associated with the WMUs were reviewed, as well as, the Michigan Department of Environmental Quality (MDEQ) Hazardous Waste Permitting website to determine the current status of the WMUs. Table 1 presents a document chronology for each of the WMUs on RACER's Saginaw Nodular Industrial Land. Attachment A presents a screen capture of the MDEQ Hazardous Waste Permitting website. The website summarizes the "Legal Operating Status" of hazardous waste "Units" at the SMCO Facility. A table found on Figure 1 summarizes the status of the WMUs on RACER property, which is based on historical documentation and MDEQ's website.

The following discrepancies on the WMUs status were identified between the historical documentation and the MDEQ website:

- WMU – Former Nodular Iron Plant Oil House RCRA Hazardous Waste Drum Storage Area (Alias G.1 or WMU 3) was not matched with any of the entries on the MDEQ website. Attachment B presents a copy of the most recent information that was submitted to the MDEQ on this WMU.
- WMU – Former (Replacement) Desulfurization Slag RCRA Treatment Unit (Alias G.5, WMU-7, or NewTreat) was identified on the MDEQ website as "ISCA – Interim Status – Referred to Corrective Action", whereas a MDEQ letter dated February 27, 2004, certified closure of this WMU. Attachment C presents a copy of the closure letter.

Based on the historical documentation, MDEQ approved the closure of WMUs 4, 5, and 7. Therefore, the MDEQ should update their website under the “Legal Op Status” heading for “NewTreat”, WMU 7 from “ISCA – Interim Status – Referred to Corrective Action” to “ISCP – Interim Status – Closed With Waste in Place” to be consistent with the “Legal Op Status” of WMUs 4 and 5 that were also closed in the closure letter presented in Attachment C.

Based on historical documentation, no response from MDEQ has been provided to date on the request for closure for WMU 3. WMU 3 does not appear to match any of the entries on MDEQ’s website. In addition, soil and groundwater data collected as part of the RCRA Facility Investigation (RFI) in the vicinity of WMU 3 was screened against applicable Michigan Part 201 screening criteria as of June 2005, as presented in the RFI databox figures included in Attachment D, and evaluated in the Human Health Risk Assessment (HHRA) and the Ecological Risk Assessment (ERA). The data from this area only exceeded screening criteria in groundwater for Michigan Part 201 Industrial commercial II, III, and IV Drinking Water criteria for two constituents; arsenic and antimony. The HHRA and ERA reviewed reasonable exposure pathways and concluded that there were no unacceptable risks to human health or the environment in the vicinity of WMU 3. Therefore, based on the information submitted to MDEQ and the conclusions of the HHRA and ERA, we believe MDEQ should approve closure of WMU 3.

Furthermore, based on the level of investigation conducted in each of the WMU areas evidenced by the number of Pre-RFI and RFI investigative locations on Figure 1, the WMUs have been adequately characterized. The characterization information has been considered as part of the on-going Corrective Action process, including the August 2005 Description of Current Conditions, the September 2012 Supplemental RFI Report, and the April 2013 Draft Final Corrective Measures Proposal.

Finally, based on the above discussion and attached supporting information, we believe there is no additional action required to address the WMUs except for the proposed final corrective measures, which includes site-wide deed restrictions on land use at the Site to remain consistent with the current industrial (nonresidential) use and for on-Site groundwater use as a potable source.

Figure 1 – Waste Management Unit Locations

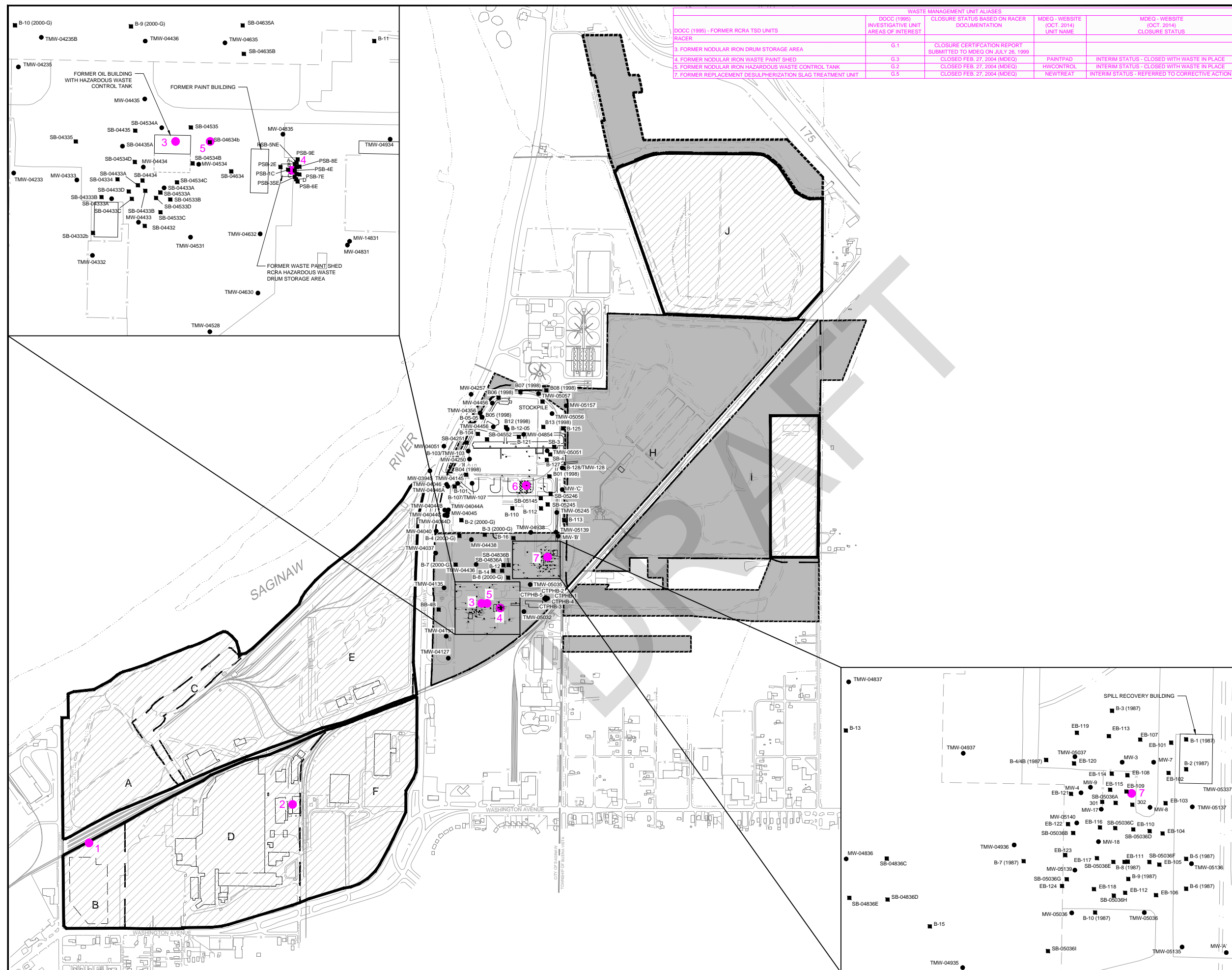
Table 1 – WMU Documentation Chronology

Attachment A – Screen Capture of the MDEQ Hazardous Waste Permitting Website

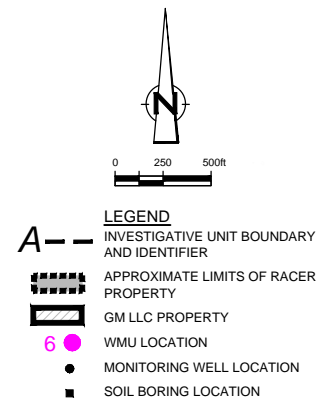
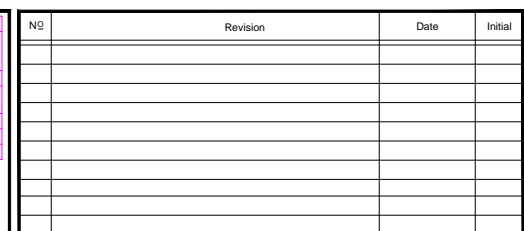
Attachment B – Closure Certification Report – Nodular Iron Oil House RCRA Hazardous Waste Storage Area

Attachment C – Certificate of Final Closure of Hazardous Waste Management Units

Attachment D – RFI Databox Figures



		WASTE MANAGEMENT UNIT ALIASES			
		DOCC (1995) INVESTIGATIVE UNIT AREAS OF INTEREST	CLOSURE STATUS BASED ON RACER DOCUMENTATION	MDEQ - WEBSITE (OCT. 2014) UNIT NAME	MDEQ - WEBSITE (OCT. 2014) CLOSURE STATUS
DOCC (1995) - FORMER RCRA TSD UNITS RACER					
3. FORMER NODULAR IRON DRUM STORAGE AREA	G.1	CLOSURE CERTIFICATION REPORT SUBMITTED TO MDEQ ON JULY 26, 1999			
4. FORMER NODULAR IRON WASTE PAINT SHED	G.3	CLOSED FEB. 27, 2004 (MDEQ)	PAINTPAD	INTERIM STATUS - CLOSED WITH WASTE IN PLACE	
5. FORMER NODULAR IRON HAZARDOUS WASTE CONTROL TANK	G.2	CLOSED FEB. 27, 2004 (MDEQ)	HWCONTROL	INTERIM STATUS - CLOSED WITH WASTE IN PLACE	
7. FORMER REPLACEMENT DESULPHERIZATION SLAG TREATMENT UNIT	G.5	CLOSED FEB. 27, 2004 (MDEQ)	NWETREAT	INTERIM STATUS - REFERRED TO CORRECTIVE ACTION	



SCALE VERIFICATION

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

Approved

DRAFTING STATUS

Status	Date	Initial

REVITALIZING AUTO COMMUNITIES
ENVIRONMENTAL RESPONSE TRUST
SAGINAW NODULAR INDUSTRIAL LAND

SAGINAW, MICHIGAN

WASTE MANAGEMENT UNIT LOCATIONS

**CONESTOGA-ROVERS & ASSOCIATES**

Source Reference:

Project Manager: M. TOMKA	Reviewed By: J. PARDYS	Date: AUGUST 2014	
Scale: 1:500	Project N°: 58502-T02	Report N°: PRES009	Drawing N°: figure 1

**WMU DOCUMENTATION CHRONOLOGY
SAGINAW NODULAR INDUSTRIAL LAND
SAGINAW, MICHIGAN**

FORMER NODULAR IRON PLANT OIL HOUSE RCRA HAZARDOUS WASTE DRUM STORAGE AREA

Alias: G.1 - DOCC (1995), WMU 3 - Phase 1A Work Plan (1998)

Document Date	Author	Transmitted to:	Type of Document	Re:
July 26, 1999	EMCON	Stephen G. Bude, MDEQ	Report	Closure Certification Report - Nodular Iron Oil House RCRA Hazardous Waste Storage Area

FORMER RCRA HAZARDOUS WASTE CONTROL AST

Alias: G.2 - DOCC (1995), WMU 5 - Phase 1A Work Plan (1998), HWControl - MDEQ Website (2014)

Document Date	Author	Transmitted to:	Type of Document	Re:
December 21, 1987	RMT Inc.		Report	Closure Plan for Interim Status Hazardous Waste Control Tank
April 28, 1988	Andrea R. Schoenrock - MDNR	William Hudson - GMC	Letter	Closure Plan Review
June 10, 1988	Alan J. Howard - MDNR	William Hudson - GMC	Letter	Closure Plans
October 5, 1989	RMT Inc.		Report	Documentation Report for RCRA Closure of a Hazardous Waste Control Tank
May 24, 1999	Cheryl Howe - MDEQ	William K. Steinmann - EMCON	Letter	Review of Closure Certification Reports
January 9, 2001	Cheryl R. Hiatt - GMC	Cheryl Howe - MDEQ	Letter	Response to MDEQ's Technical Review - Comments on the Hazardous Waste Control Tank Report
February 27, 2004	George W. Bruchmann - MDEQ	Cheryl R. Hiatt - GMC	Letter	Certification of Final Closure of Hazardous Waste Management Units

FORMER NODULAR WASTE PAINT SHED RCRA HAZARDOUS WASTE DRUM STORAGE AREA

Alias: G.3 - DOCC (1995), WMU 4 - Phase 1A Work Plan (1998), PaintPad - MDEQ Website (2014)

Document Date	Author	Transmitted to:	Document Type	Re:
December 21, 1987	RMT Inc.		Report	Closure Plan for Interim Status Paint Storage Building Drum Storage Area
April 28, 1988	Andrea R. Schoenrock - MDNR	William Hudson - GMC	Letter	Closure Plan Review
May 26, 1988	RMT Inc.		Report Addendum	Addendum to Closure Plan for Interim Status Paint Storage Building Drum Storage Area
June 10, 1988	Alan J. Howard - MDNR	William Hudson - GMC	Letter	Closure Plans
September 1988	RMT Inc.		Report	Documentation Report for RCRA Closure of the Paint Storage Building Drum Storage Area
May 24, 1999	Cheryl Howe - MDEQ	William K. Steinmann - EMCON	Letter	Review of Closure Certification Reports
January 9, 2001	Cheryl R. Hiatt - GMC	Cheryl Howe - MDEQ	Letter	Response to MDEQ's Technical Review - Comments on the Paint Storage Building Drum Storage Area Report
February 27, 2004	George W. Bruchmann - MDEQ	Cheryl R. Hiatt - GMC	Letter	Certification of Final Closure of Hazardous Waste Management Units

FORMER (REPLACEMENT) DESULFURIZATION SLAG RCRA TREATMENT UNIT

Alias: G.5 - DOCC (1995), WMU 7 - Phase 1A Work Plan (1998), NewTreat - MDEQ Website (2014)

Document Date	Author	Transmitted to:	Document Type	Re:
December 21, 1987	RMT Inc.		Report	Interim Status Closure Plan for Existing Calcium Carbide Desulfurization Slag Treatment Bunker
April 28, 1988	Andrea R. Schoenrock - MDNR	William Hudson - GMC	Letter	Closure Plan Review
May 26, 1988	Richard C. Krueger and Thomas J. Jan	Andrea R. Schoenrock - MDNR	Letter	Addenda to RCRA Closure Plans
May 26, 1988	RMT Inc.		Report Addendum	Addendum to Closure Plan for Interim Status Paint Storage Building Drum Storage Area
June 10, 1988	Alan J. Howard - MDNR	William Hudson - GMC	Letter	Closure Plans
July 15, 1988	RMT Inc.		Report	Amendments the the Closure Plan for the Existing Calcium Carbide Desulfurization Slag Treatment Bunker
July 21, 1988	William Hudson - GMC	Andrea R. Schoenrock - MDNR	Letter	Closure Plans for the Old and Existing Calcium Carbide Desulfurization Slag Treatment Units
September 26, 1988	Andrea R. Schoenrock - MDNR	William Hudson - GMC	Letter	Calcium Carbide Slag Units
October 1991	Joseph B. Medved - GMC	Cheryl Howe - MDEQ	Report	Documentation Report for RCRA Closure of an Existing Calcium Carbide Desulfurization Slag Treatment Bunker
May 24, 1999	Cheryl Howe - MDEQ	William K. Steinmann - EMCON	Letter	Review of Closure Certification Reports
September 11, 2001	Cheryl R. Hiatt - GMC	Cheryl Howe - MDEQ	Letter	Response to MDEQ's Technical Review - Comments on the Existing Calcium Carbide Desulfurization Slag Treatment Unit Report
February 27, 2004	George W. Bruchmann - MDEQ	Cheryl R. Hiatt - GMC	Letter	Certification of Final Closure of Hazardous Waste Management Units

Attachment A

**Screen Capture of the MDEQ
Hazardous Waste Permitting Website**

395505 / MID041793340 SAGINAW METAL CASTING OPERATIONS
2815 HACK ROAD, SAGINAW, MI 48601

Facility	Requires MOR	NCAPS	Baseline Group
	No	H - High	2020

General:

Requires MOR: No **NCAPS:** H - High

Baseline Group: 2020 **Recycles Recyclable Material on Site:** No

Assignments:

District Staff: Walkington, Terry (INACTIVE) **EQA Staff:**

Permit Engineer: Howe, Cheryl **EPA Staff:** Mirtha Capiro, Enf.

Geologist: Carnagie, Mary **Lead Agency:** E - EPA

Toxicologist:

Facility Workplan Commitments	Area RAU	Program Universes (11)	Authorized B.R. Mgmt. Method Codes (0)	Authorized Waste Codes (1)	Recycles Recyclable Material On-Site Waste Codes (0)	Units (6)	
Unit Name	Process	Effective Date	Legal Op Status				Capacity ▼
6 OLDTREAT	T04 - OTHER TREATMENT	5/24/1999	ISCP - Interim Status - Closed With Waste In Place				7,000.00
7 NEWTREAT	D99 - OTHER DISPOSAL	5/24/1999	ISCA - Interim Status - Referred to Corrective Action				50.00
PARTSPAD	S01 - CONTAINER	2/7/1985	ISIN - Interim Status - Inactive/closing, But Not Yet Rcra Closed				5.00
4 PAINTPAD	S01 - CONTAINER	5/24/1999	ISCP - Interim Status - Closed With Waste In Place				4,725.00
5 HWCONTROL	T01 - TANK TREATMENT	5/24/1999	ISCP - Interim Status - Closed With Waste In Place				10,000.00
GREYPAD	S01 - CONTAINER	11/10/1998	ISCC - Interim Status - Clean Closed				1,045.00

Attachment B

Closure Certification Report – Nodular Iron Oil House RCRA Hazardous Waste Storage Area



EMCON

603 East Diehl Road • Suite 123 • Naperville, Illinois 60563-1477 • (630) 505-9450 • Fax (630) 505-9454

July 26, 1999

Project: 84068-063.009

Mr. Stephen G. Buda, P.E.
Chief, Hazardous Waste Permits
Michigan Department of Environmental Quality
Waste Management Division
John A. Hannah Building
P.O. Box 30241
Lansing, Michigan 48909-7741

Re: Closure Certification Report for Nodular Iron Oil House RCRA Hazardous Waste Storage Area at General Motors' Saginaw Metal Casting Operations, Saginaw, Michigan

Dear Mr. Buda:

Enclosed please find the Closure Certification Report for the Nodular Iron Oil House RCRA Hazardous Waste Storage Area at the General Motors Saginaw Metal Casting Operations Plant in Saginaw, Michigan.

If you have any questions or comments, or would like any additional information, please contact our office.

Sincerely,

EMCON

William K. Steinmann, CPG
Senior Project Manager

James J. McGuigan, P.E., CHMM
Site Restoration Department Manager

Attachment: Closure Certification Report for Nodular Iron Oil House RCRA Hazardous Waste Storage Area

cc: Mirtha Capiro, U.S.EPA
Ed Haapala, MDEQ Bay City District
Cheryl Hiatt, GM Remediation Team
Jean Caufield, GM Remediation Team
Tony Thrubis, GM Legal Staff
Dr. Lisa Williams, U.S. DOI, Fish and Wildlife



CLOSURE CERTIFICATION REPORT

**Nodular Iron Oil House RCRA Hazardous Waste Storage Area
Former Nodular Iron Plant
(Saginaw Metal Casting Operations)
2100 Veterans Memorial Parkway
Saginaw, Michigan**

JULY 1999

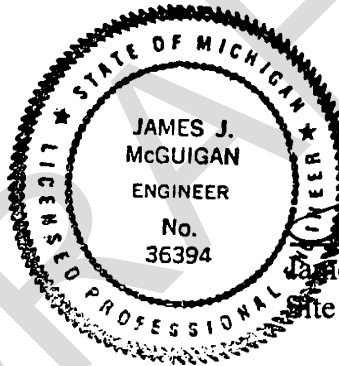
Prepared by:

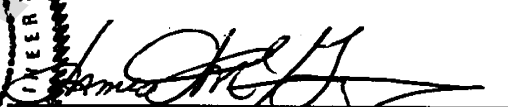
**EMCON
603 East Diehl Road, Suite 123
Naperville, Illinois**

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

CERTIFICATION OF CLOSURE

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete, and the closure activities for this unit have been conducted in substantial conformance with the approved closure plan. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."




James J. McGuigan, P.E., CHMM
Site Restoration Department Manager

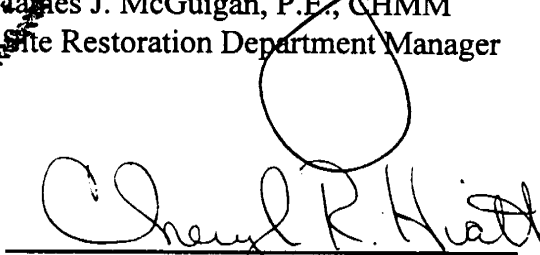

General Motors Corporation

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Attachment II: Closure Plan (May 19, 1981)
Attachment III: Photographic Documentation of Closure Activities
Attachment IV: Wastewater Characterization Analysis
Attachment V: Waste Disposal Manifests

1 INTRODUCTION

1.1 Purpose

In accordance with Part 111 of the Michigan Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994, as amended, and in compliance with the closure provisions of 40 CFR, Part 265, Subpart G, this report certifies the closure of a Resource Conservation and Recovery Act (RCRA) Storage Area, formerly located at General Motors Corporation's (GM) Nodular Iron Plant, 2100 Veterans Memorial Parkway, Saginaw, Michigan (now part of the Saginaw Metal Casting Operations - SMCO). The United States Environmental Protection Agency (U.S.EPA) Identification Number for SMCO is MID 041 793 340.

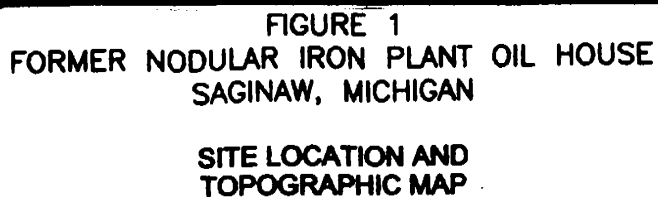
1.2 Background

The former storage unit was located at the former Nodular Iron Plant Oil House, 2100 Veterans Memorial Parkway, Saginaw, Michigan, within the NE 1/4 of the SW 1/4 of Section 8, Township 12 North, Range 5 East, Saginaw County, Michigan (refer to **Figure 1**).

According to the facility's RCRA Part A Permit Application (November 17, 1980), this unit consisted of a ten foot square storage pad (**Attachment I**). In actuality, the unit consisted of two,

MICHIGAN

QUADRANGLE LOCATION



DATE 1/28/99
DWN AMC
APP BKS
REV _____
PROJECT NO.
84068-063.009

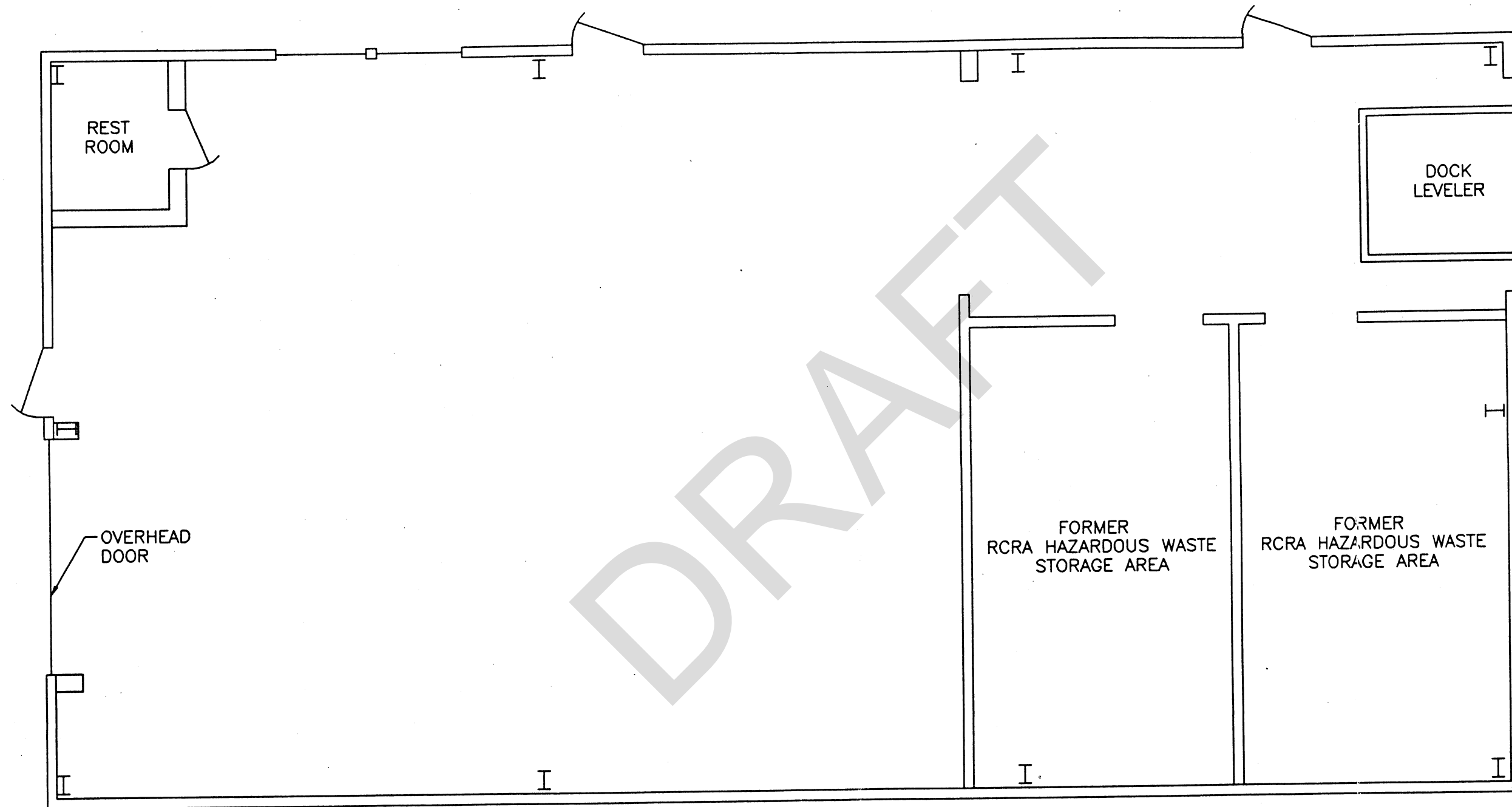
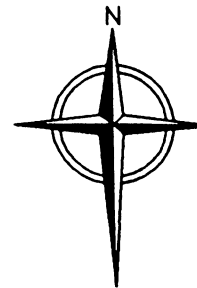
CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

approximately eleven feet by nineteen feet by fifteen feet high rooms complete with concrete and steel walls, a concrete floor, a ceiling and metal fire doors (refer to **Figure 2**).

The use of the Oil House Storage Unit reportedly began at former Nodular Iron Plant start-up in 1966 and continued until just prior to plant closure in 1987. The Oil House Storage Unit was utilized to store hazardous waste materials staged in 55-gallon barrels until proper disposal. The main waste believed to have been stored on this pad was 1,1,1-trichloroethane (TCA) with lesser amounts of polychlorinated biphenyls (PCBs), chlorobenzene, waste petroleum naphtha, waste oils, and possibly trichloroethylene (TCE).

General Motors submitted a Closure Plan (dated May 19, 1981) to the U.S.EPA, for this storage area and others, pursuant to 40 CFR, Part 265, Subpart G, Sections 265.110 through 265.120 (**Attachment II**) on April 14, 1983. The Closure Plan was public noticed in the *Saginaw News* on May 5, 1983.

In an August 17, 1998, meeting between the Michigan Department of Environmental Quality - Waste Management Division (MDEQ-WMD), GM, and GM's consultant EMCON, it was agreed that GM could attain closure for this unit by implementing and adhering to the 1981 Closure Plan.



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SCALE IN FEET



DATE 5/20/99
DWN AMC
APP BKS
REV
PROJECT NO.
84068-063.009

FIGURE 2
SAGINAW METAL CASTING OPERATIONS
2100 VETERANS MEMORIAL PARKWAY
SAGINAW, MICHIGAN
FORMER NODULAR IRON PLANT
OIL HOUSE BUILDING LAYOUT

2 CLOSURE ACTIVITIES

On November 2, 1998, Clean Harbors Environmental Services, Inc. (Clean Harbors) of Chicago, Illinois mobilized to the Nodular Iron Oil House for the purpose of decontaminating/cleaning the RCRA Storage Area. A representative from EMCON was present at the site to direct and supervise the decontamination/cleaning activities. Photographic documentation of the closure activities is included in **Attachment III**).

2.1 Field Decontamination/Cleaning

On November 2, 1998, Mr. Steven M. Clayton, Staff Geologist, with the EMCON office in Northville, Michigan, supervised the decontamination of the Nodular Iron Plant Oil House RCRA Hazardous Waste Drum Storage Area located on the site of the Former Saginaw Nodular Iron Plant at 2100 Veterans Memorial Parkway, Saginaw, Michigan. The purpose of the decontamination event was to ensure the removal of any residual material on the walls and floor of the two-room storage facility located in the Nodular Iron Oil House in preparation for closure and demolition activities. Mr. Clayton met with Dave Longdon, foreman for Clean Harbors, and discussed the agenda for decontamination of the storage building. Mr. Longdon was assisted by two crew members, T. Waisley and E. Bogan.

The walls and floor of each room were scrubbed with a 5% alkaline caustic scrub solution. Clean Harbors washed the walls and floor with the caustic scrub solution and extendible scrub brushes. The solution was drawn off via vacuum pick-up and containerized in two 55-gallon drums. As a final step, the walls and floor of each room were steam cleaned. The rinse water from the steaming operations was also drawn off via vacuum pick-up and collected in the same two 55-gallon drums. Mr. Clayton supervised and documented (via digital photographs presented in **Attachment III**) the decontamination process and documented the cleaning operation of each room. The two 55-gallon drums were sealed, labeled, and placed near the entrance of the former Nodular Iron Plant Oil House. The decontamination process was completed following the 1981 Approved General Motors Closure Plan and the health and safety plan developed for the site¹. Yellow Tyvek suits, respiratory protection, nitrile gloves, safety glasses, and rubber boots were worn by all three members of the Clean Harbors crew during the entire decontamination process.

2.2 Wastewater Disposal

Clean Harbors collected representative samples from the two 55-gallon drums for waste characterization analysis (**Attachment IV**). On January 19, 1999, Clean Harbors removed the barrels from the site and transported the drums to Clean Harbors Services, Inc. in Chicago, Illinois for treatment and disposal. The waste manifest is included as **Attachment V**.

¹ Part VI of the Phase 1A RCRA Facility Investigation Workplan (June 1998, Revision 2).

3 SUMMARY AND CONCLUSIONS

On November 2, 1998, under the direction and supervision of EMCON, Clean Harbors Environmental Services, Inc. of Chicago, Illinois completed decontamination/cleaning activities at the Former Nodular Iron Plant Oil House RCRA Hazardous Waste Storage Area, located at 2100 Veterans Memorial Parkway, Saginaw, Michigan. These activities were completed in accordance with the Closure Plan which was previously approved by the Michigan Department of Environmental Quality - Waste Management Division.

The storage area consisted of two enclosed rooms within the Oil House Building (approximate dimensions of 11 feet by 19 feet by 15 feet high) that were utilized to store hazardous waste (1,1,1-TCA, PCBs, waste petroleum naphtha, chlorobenzene, waste oils, and possibly TCE). Decontamination/cleaning activities were completed on November 2, 1998.

Two, 55-gallon drums of wash rinse water were generated from the decontamination activities and were properly disposed by Clean Harbors. The Oil House Building was demolished in the spring of 1999 after completing decontamination and cleaning activities at the RCRA Hazardous Waste Storage Area.

Based on the above, GM and EMCON conclude that the closure activities have been successfully completed in conformance with the specifications in the approved Closure Plan. Therefore, GM respectfully requests that closure be granted for the former Nodular Iron Plant Oil House RCRA

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

Hazardous Waste Storage Area and that all financial assurance requirements be released for this former unit.

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CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

ATTACHMENT I

RCRA Part A Permit Application (November 17, 1980)

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Part A Original
11/17/80

FORM 1 GENERAL	EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permit Program</i> (Read the "General Instructions" before starting.)	I. EPA I.D. NUMBER
			F M I D O 4 1 7 9 3

EPA I.D. NUMBER	PLEASE PLACE LABEL IN THIS SPACE	GENERAL INSTRUCTIONS If a preprinted label has been in the designated space. Re-read it carefully; if any of it is through it and enter the corresponding fill-in area below the preprinted data is absent (that should appear), please provide proper fill-in area(s) below. Complete and correct, you need Items I, III, V, and VI (except must be completed regardless items if no label has been provided the instructions for detailed instructions and for the legal authority which this data is collected.
II. FACILITY NAME		
V. FACILITY MAILING ADDRESS		
VI. FACILITY LOCATION		

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS
	YES	NO	FORM ATTACHED	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		N.A.	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)

III. NAME OF FACILITY

1 **SKIP** **GMC CHEVROLET SAGINAW CASTING & PARTS PL.**

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2 CARTER NORMAN CHF	METALLURGIST	517	776 2572

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 2100 VETERANS MEMORIAL PARKWAY		SAGINAW	MI	48601

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME	C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE
5 2100 VETERANS MEMORIAL PARKWAY		SAGINAW				

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	3	3	2	7	3	3	2
(specify) Grey Iron Foundry				(specify) Iron and Steel Foundries			
C. THIRD				D. FOURTH			
7	3	7	1	7	3	7	1
(specify) Motor Vehicle Parts & Accesories				(specify) Motor Vehicles & Equipment			

VIII. OPERATOR INFORMATION

A. NAME												B. Is the name of the owner?	
G M C C H E V R O L E T S A G I N A W C A S T I N G & P A R T S P L												<input checked="" type="checkbox"/> YES	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)													
F - FEDERAL				M - PUBLIC (other than federal or state)				P - PRIVATE				O - OTHER (specify)	
				P									
D. PHONE (area code & no.)													
A				5 1 7				7 7 6				2 5	
E. STREET OR P.O. BOX													
2 1 0 0 V E T E R A N S M E M O R I A L P A R K W A Y													
F. CITY OR TOWN													
B S A G I N A W													
G. STATE				H. ZIP CODE									
M I				4 8 6 0 1									
IX. INDIAN LAND													
Is the facility located on Indian land?													
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO													

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)			
9	N	M	I	9	P	N	A
B. UIC (Underground Injection of Fluids)				E. OTHER (specify)			
9	U	N	A	(specify) State Air Pollution			
C. RCRA (Hazardous Wastes)				E. OTHER (specify)			
9	N	A	(specify) City of Saginaw Sanitary Sewer (Parts & Cstg. Plts.)				

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

The Chevrolet Metal Casting Plants in Saginaw produce grey and nodular iron castings used in the automotive industry. The specific process involves the melting of iron and steel scrap with coke, limestone, dolomite and fluorspar in water cooled cupolas to make molten metal. This is poured into green sand molds with or without cores for the manufacture of the above castings.

The Chevrolet Parts Plant Manufacturing and Machining Plant produces water pumps, oil pumps and flywheel ring gears as major components. Machining is performed on cast iron, aluminum and steel.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in this application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
V. J. President, General Motors Corp. General Manager, Chevrolet Motor Div.		<i>R. K. B. B. B.</i>		November 17,	
COMMENTS FOR OFFICIAL USE ONLY					

Please print or type in the unshaded areas only
(fill-in areas are spaced for cursive type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S-

FORM 3
RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F M I D 0 4 1 7 9 3

FOR OFFICIAL USE ONLY

APPLICATION APPROVED

DATE RECEIVED
(yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ **1. EXISTING FACILITY** (See instructions for definition of "existing" facility. Complete item below.)

☐ **2. NEW FACILITY** (Complete I

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED
(use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE CONSTRUCTION BEGAN OR THE DATE EXPECTED TO BE COMPLETED
(use the boxes to the left)

B. REVISED APPLICATION (place an "X" below and complete item I above)

☐ **1. FACILITY HAS INTERIM STATUS**

☐ **2. FACILITY HAS A RCRA PERMIT**

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes, describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	501	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY, LITERS PER DAY
TANK	502	GALLONS OR LITERS		T02	GALLONS PER DAY, LITERS PER DAY
WASTE PILE	503	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT	T03	TONS PER HOUR, METRIC TONS PER HOUR, GALLONS PER HOUR, LITERS PER HOUR
SURFACE IMPOUNDMENT	504	GALLONS OR LITERS	INCINERATOR	T04	GALLONS PER DAY, LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided: Item III-C.)		
INJECTION WELL	D01	GALLONS OR LITERS			
LANDFILL	D02	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D03	ACRES OR HECTARES			
OCEAN DISPOSAL	D04	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D05	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS.....	G	LITERS PER DAY.....	V	ACRE-Feet.....	
LITERS.....	L	TONS PER HOUR.....	D	HECTARE-METER.....	
CUBIC YARDS.....	Y	METRIC TONS PER HOUR.....	W	ACRES.....	
CUBIC METERS.....	C	GALLONS PER HOUR.....	E	HECTARES.....	
GALLONS PER DAY.....	U	LITERS PER HOUR.....	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons, the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY
		1. AMOUNT (specify)				1. AMOUNT
						2. UNIT OF MEASURE (enter code)
X-1	S 0 2	600		5		
X-2	T 0 3	20		6		
1	S 0 1	5775.0		7		
4	S 0 3	70.0		8		
3	T 0 4	7000.0		9		

Continued from the front.

JII. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

T04 - The Calcium Carbide Slag pile, accumulated daily, is soaked with water to decompose any unreacted calcium carbide.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled on an annual basis.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled on an annual basis.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that have that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4					

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-58

EPA I.O. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY														
0	1	2	3	4	5	6	7	8	9	A	B	C	0	1	2	3	4	5	6	7	8	9	A	B	C		
IV	M	I	D	O	4	1	7	9	3	3	4	0	W	DUP										2	DUP		

DESCRIPTION OF HAZARDOUS WASTES (continued)

[illegible]

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F M I D 0 4 1 7 9 3 3 4 0 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

43 27 00 N

LONGITUDE (degrees, minutes, & seconds)

083 55 08 W

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)
Robert D. Lund
Vice President, General Motors Corp.
General Manager, Chevrolet Motor Div.

B. SIGNATURE

Robert D. Lund

C. DATE SIGNED

November 17, 1980

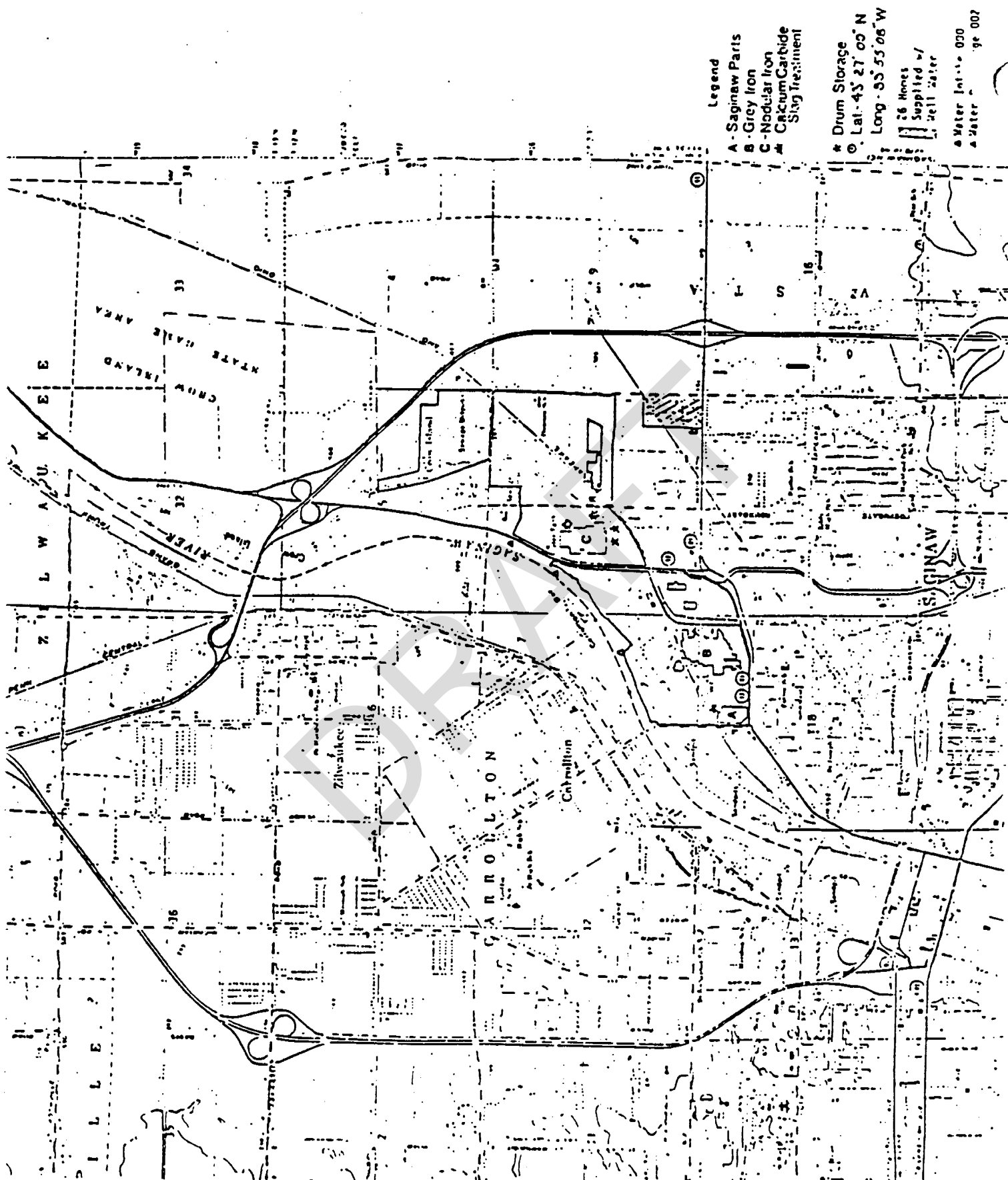
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

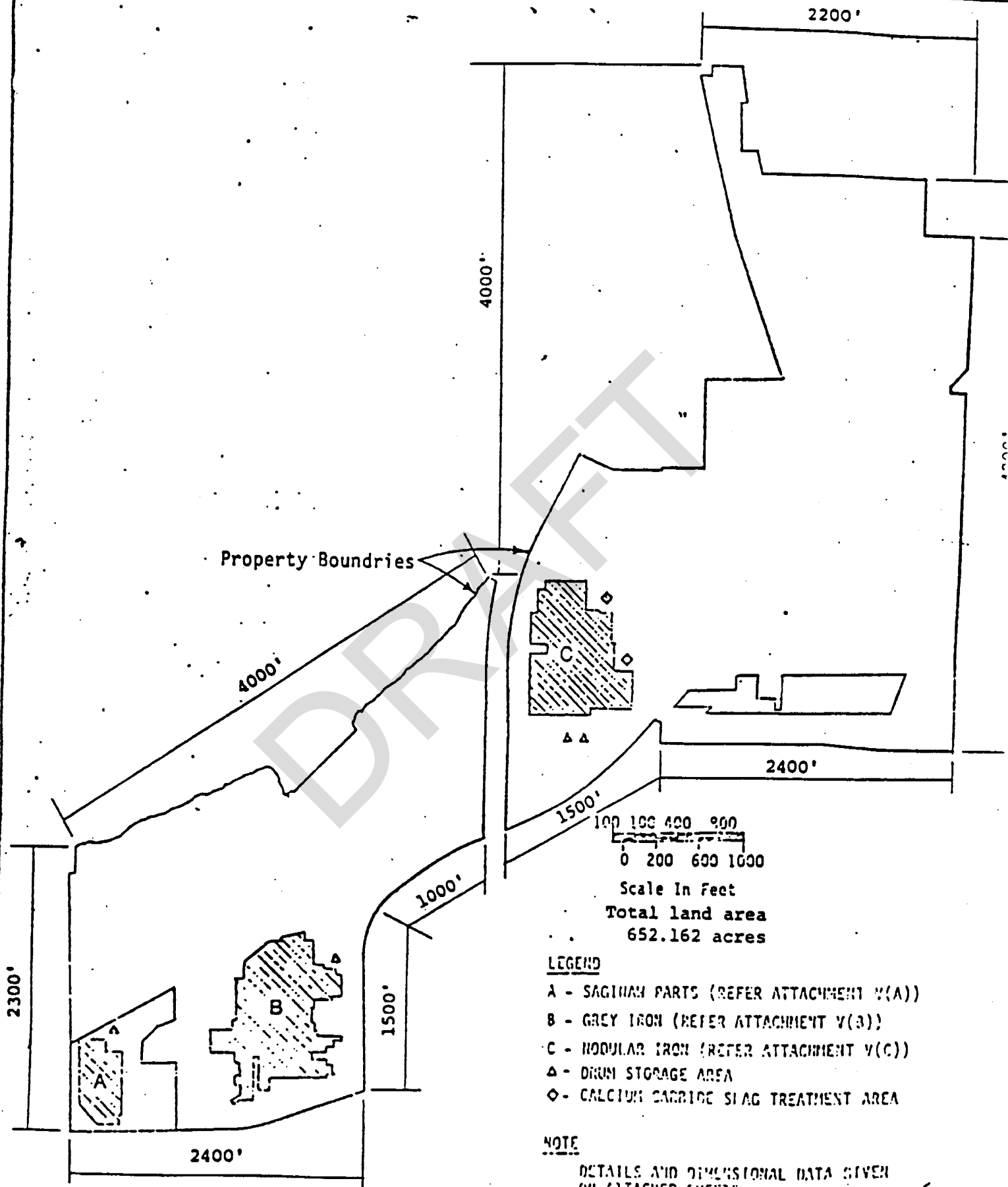
B. SIGNATURE

C. DATE SIGNED

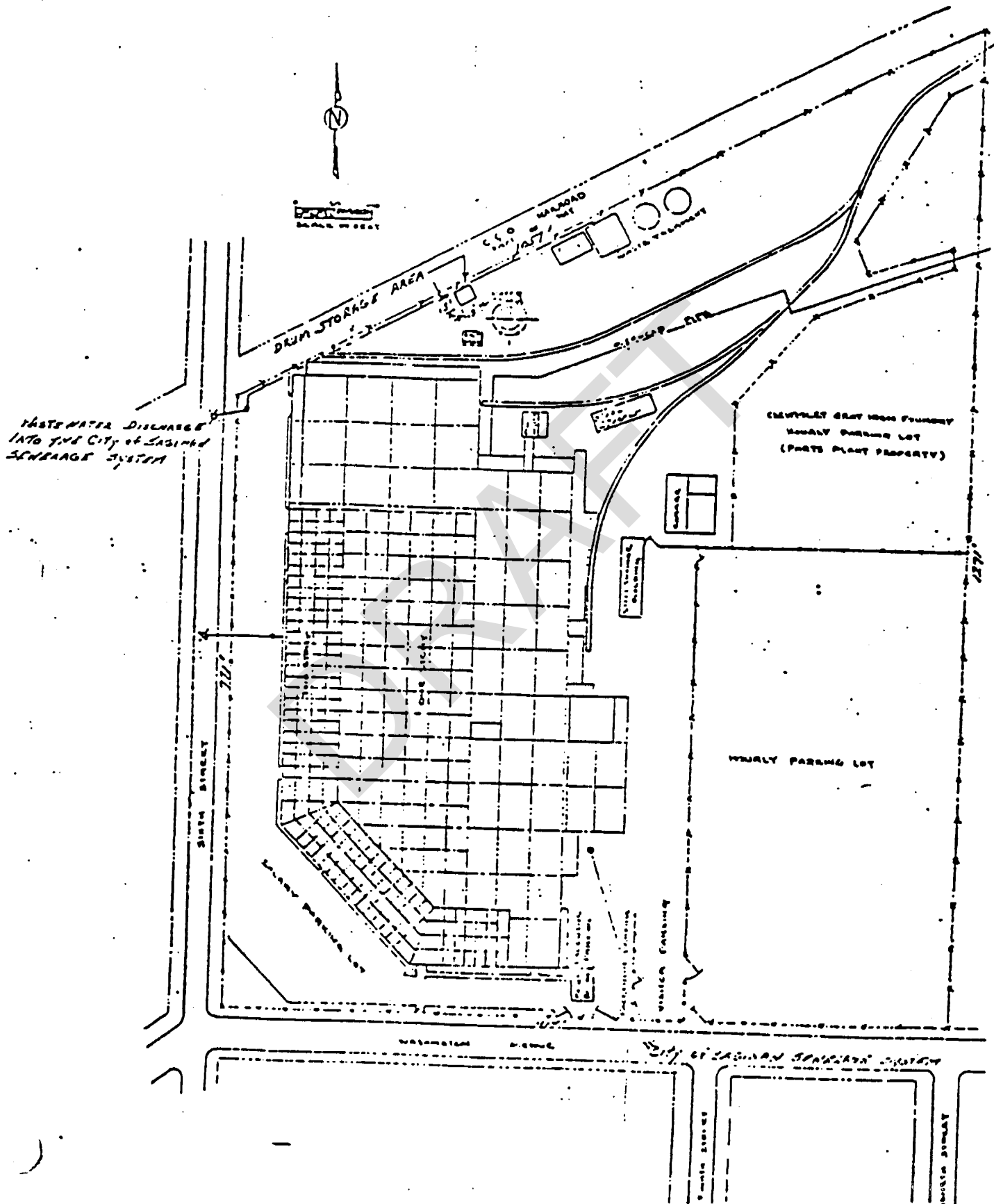


V. FACILITY DRAWING (see page 4)

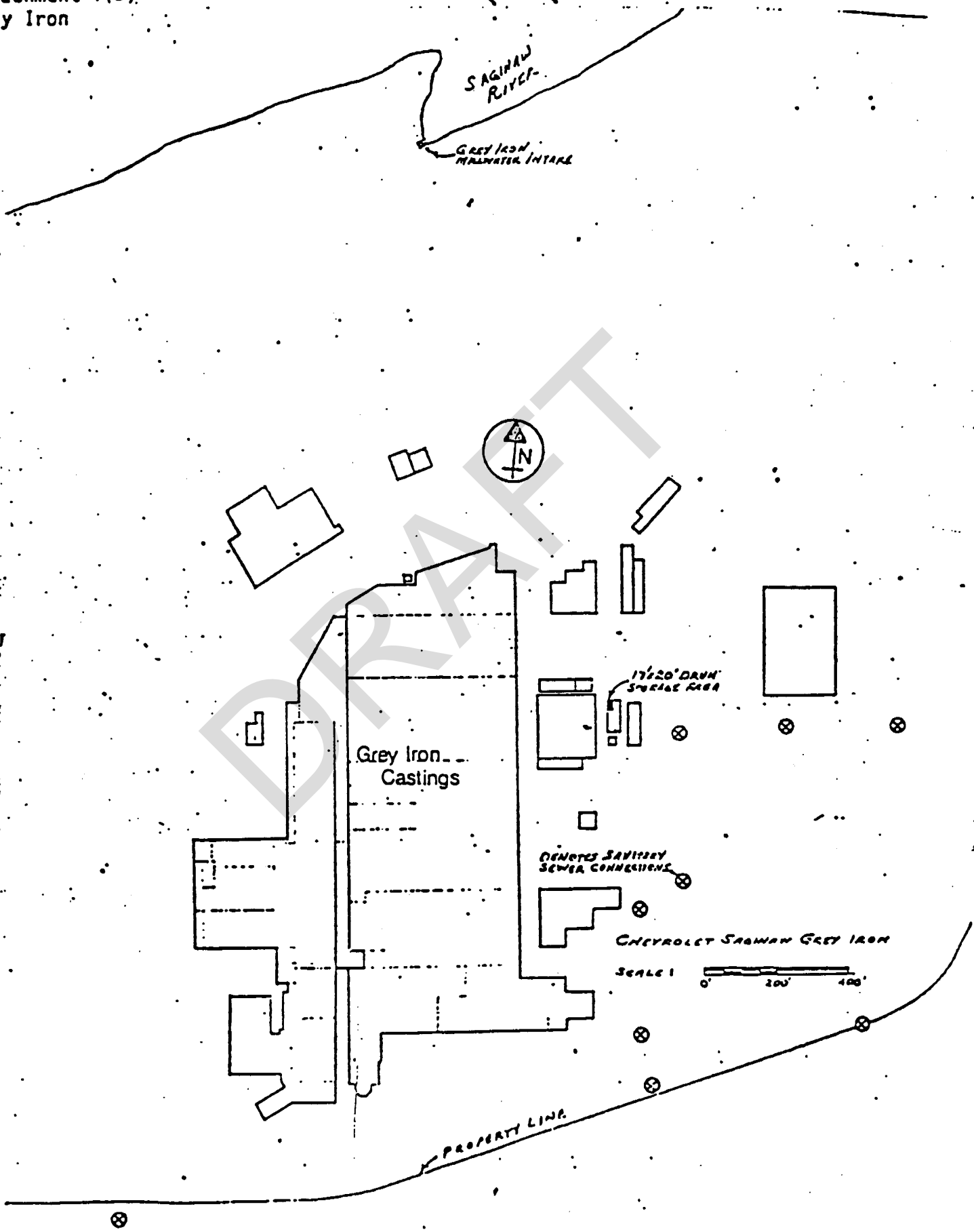
100' 200' 300' 400' 500' 600' 700' 800' 900' 1000'



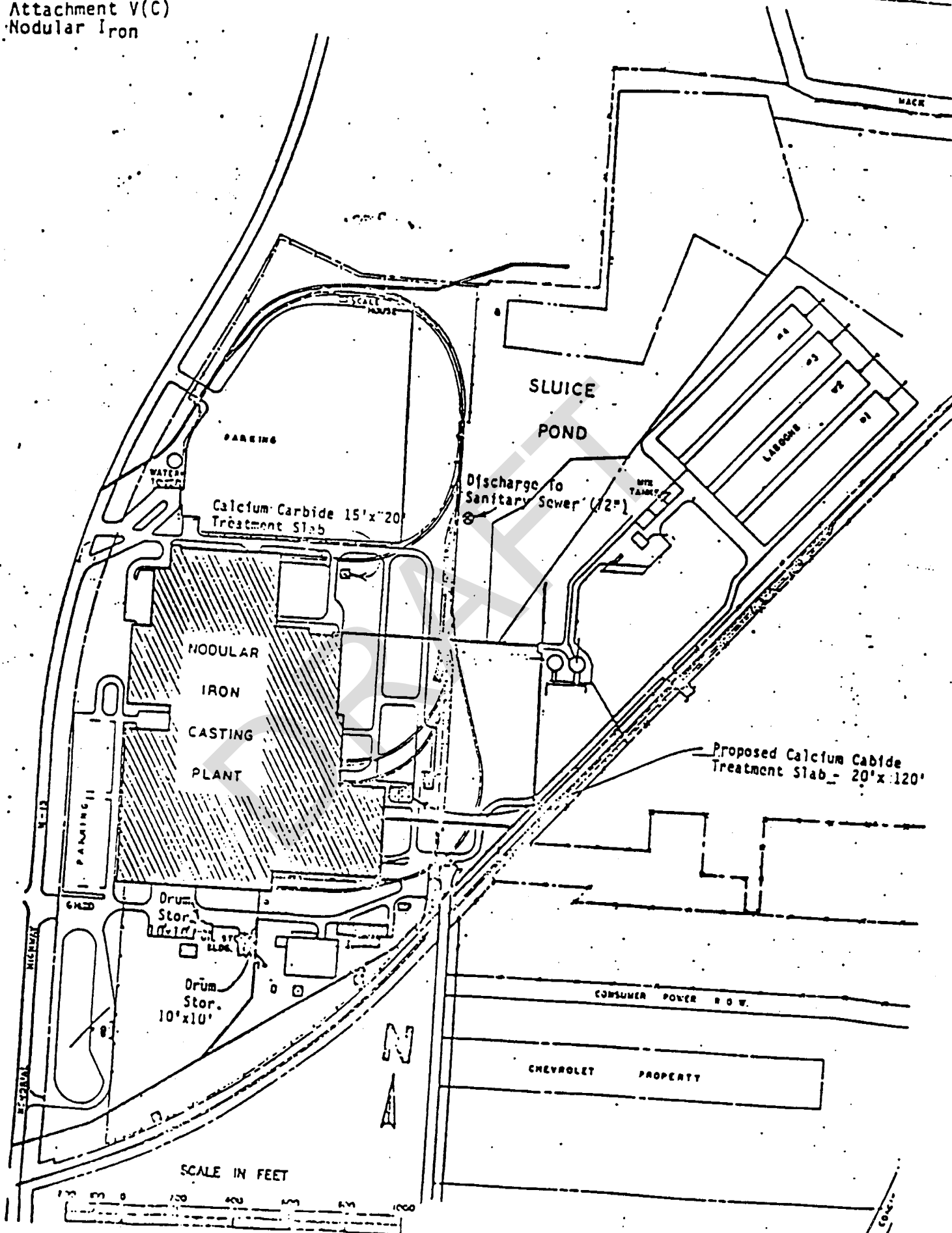
Attachment V(A)
Saginaw Parts



Attachment V(B)
Grey Iron



Attachment V(C)
Nodular Iron





ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• ILC-1793340

REASON FOR

4100 VETERANS E-MERIAL PARKWAY
JAIL A.

INSTALLATION ADDRESS

4100 VETERANS E-MERIAL PARKWAY
JAIL A.

EPA Form 8700-12A (4-80)

Part A Revised
9/28/81

From Approved OIA No 158400

U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>(Read the "General Instructions" before starting.)</i>		I. EPA I.D. NUMBER
FORM 1		F M I D O 4 1 7 9 1
PLEASE PLACE LABEL IN THIS SPACE		<p>GENERAL INSTRUCTIONS:</p> <p>If a preprinted label has been placed in the designated space, Review it carefully. If any of it is incorrect, through it and enter the correct information in the space below. If the preprinted data is correct (on left of the label space list what should appear), please provide proper fill-in area(s) below. If complete and correct, you need not provide fill-in area(s) below. Items I, III, V, and VI (except must be completed regardless). Items II, IV, VII, VIII, and IX. If no label has been provided, the instructions for detailed information and for the legal authority which this data is collected.</p>
II. POLLUTANT CHARACTERISTICS		
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any of the questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the column. If the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if you are excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.		
III. NAME OF FACILITY		
IV. FACILITY CONTACT		<p>RECEIVED</p> <p>SEP 25 1979</p> <p>Water Quality-</p>
V. FACILITY MAILING ADDRESS		
VI. FACILITY LOCATION		
VII. FACILITY LOCATION		

CONTIN

ISSUED FROM THE FRONT

IC CODES (3-digit, in order of priority)

A. FIRST		B. SECOND	
3 2 1	Grey Iron Foundry	7 3 3 2 0	Iron and Steel Foundries
C. THIRD		D. FOURTH	
7 1 4	Motor Vehicle Parts & Accessories	7 3 7 1 0	Motor Vehicles and Equipment

OPERATOR INFORMATION

A. NAME		B. Is the name listed in Item VIII-A also the owner?
S M C C H E V R O L E T S A G I N A W C A S T I N G & P A R T S P L T		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)		D. PHONE (area code & no.)	
FEDERAL	M - PUBLIC (other than federal or state)	A	5 1 7 7 7 6 2 5 7 2
STATE	O - OTHER (specify)		
PRIVATE	P		

E. STREET OR P.O. BOX	
1 0 0 V E T E R A N S M E M O R I A L P A R K W A Y	

F. CITY OR TOWN	G. STATE	H. ZIP CODE	IX. INDIAN LAND
S A G I N A W	M I	4 8 6 0 1	Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Waters)		D. PSD (Air Emissions from Proposed Sources)	
N	H I 0 0 1 1 3 9	9	P N A
B. UIC (Underground Injection of Fluids)		E. OTHER (specify)	
U	N A	9	
C. RCRA (Hazardous Wastes)		E. OTHER (specify)	
IR	N A	9	2 6 7

(specify) State Air Pollution Permits - See Attachment

(specify) City of Saginaw Sanitary Sewer (Parts & Csto. Plts. Rest

XL MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

The Chevrolet Metal Casting Plants in Saginaw produce grey and nodular iron castings used in the automotive industry. The specific process involves the melting of iron and steel scrap with coke, limestone, dolomite and fluorspar in water cooled cupolas to make molten iron. This is poured into green sand molds with or without cores for the manufacture of the above castings.

The Chevrolet Parts Plant Manufacturing and Machining Plant produces water pumps, oil pumps and flywheel ring gears as major components. Machining is performed on cast iron, aluminum and steel.

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Robert D. Lund, Vice Pres.-GMC Gen. Mgr. - Chevrolet Motor Div.	<i>Robert D. Lund</i>	9-24-81

COMMENTS FOR OFFICIAL USE ONLY

C

GMC CHEVROLET CASTINGS AND PARTS PLANT

AIR POLLUTION PERMIT RECORD

Parts Plant

273-74
101-76
434-77
708-78
954-78
13-79
238-79
101-80

Nodular Iron

56-68
68-6CA
68-68B
68-68C
68-68D
73-68
139-69
140-69
141-69
42-70
42-70A
42-70B
42-70C
292-72
449-73
158-73
74-70
58-73
59-73
74-70A
129-74
130-74
131-74
276-74
129-76
416-75
366-76
93-77
405-77
262-78
437-78
1052-78
720-79

Grey Iron

89-71A
126-71
90-71A
91-71A
92-71
125-71
93-71A
411-77
127-71
235-79
95-71
36-78
307-74A
8-76
640-79
240-76
286-76
812-77
814-77
813-77
216-73
344-73
393-73
79-76
501-79
593-77
253-74
916-79
811-77
918-78
234-80
210-73
507-77
18-80
33-77
451-80
44-77
35-77
36-77
224-79
223-79
222-79
221-79
38-74A

Grey Iron

38-74B
350-80
361-74
349-80
392-73
105-74
35-78
37-78
38-78
39-78
24-75
225-79
40-78
41-78
947-79
42-78
134-76
43-78
44-78
45-78
46-78
47-78
400-75
48-78
49-78
50-78
101-79
100-79
23-74D
23-74C
23-74B
23-74A
88-78
302-73
113-76
303-73
100-73
101-73
102-73
103-73

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

ATTACHMENT II

Closure Plan (May 19, 1981)

DRAFT

FEB. 14, 1994

5 009

CLOSURE PLAN
CHEVROLET METAL CASTINGS
GENERAL MOTORS CORPORATION

I. Introduction

Under the U.S. EPA Regulations, 40 CFR, Part 265, Subpart G, Sections 265.110 through 265.120, each facility which stores, treats, or disposes of hazardous wastes must have a closure plan on file. This closure plan has been prepared to cover the following facility:

A. EPA I.D. Number: MID041793340

B. Facility Name: General Motors Corporation
Chevrolet Saginaw Casting & Parts Plant
2100 Veterans Memorial Parkway

C. This Plan Prepared by: David C. Ruhland, Project Engineer
May 18, 1981

Plan Revisions:	Mk.	Date	Revision	By

D. Facilities for Hazardous Waste:

<u>Location</u>	<u>Type</u>	<u>Materials Handled</u>
Parts Plant	Storage	Used Chlorathene VG, Paint Residues, & Thinners
Grey Iron	Storage	Used Chlorathene VG, Used caustic solution Paint Residues, & Thinners
Nodular Iron	Storage	Used Chlorathene VG Paint Residues, & Thinners
Nodular Iron	Treatment	Calcium Carbide Slag

RIN 768-94

FEB. 14, 1994

Maximum Waste Inventory - The following table shows the maximum quantity of wastes on hand at any one time:

Used 1,1,1, Trichlorethane	120 - 55 Gal. Drums
Paint Residue & Thinners	120 - 55 Gal. Drums
Caustic Solution	60 - 55 Gal. Drums
Calcium Carbide Slag	720 Tons

III. Schedule for Closing

This facility does not have a definite closure date. The following schedule is open-ended. It lists the time table for closure in terms of elapsed time subsequent to the time that EPA, or an EPA authorized state agency, has approved this Closure Plan (refer Section 265.112 c)

Day 1 - Plant termination of hazardous waste activity.

Day 10 - All paint residues, thinners, caustic solution and degreaser solvents removed from storage and shipped for disposal.

Day 20 - Storage areas washed with a detergent solution and rinsed with potable water. Detergent solution and rinse water will be collected, tested and if required will be disposed of in an approved landfill.

Day 28 - Contents of the calcium carbide slag treatment area will be treated to deactivate the unreacted calcium carbide. Treated material will be removed to disposal area.

Day 30 - Any used drums will be shipped for proper disposal/reclamation.

Day 35 - Closure should be complete.

Day 40 - Certification of closure by independent registered professional engineer.

IV. Decontamination of Facility & Equipment:

1. Pretreatment of Calcium Carbide Slag Treatment Area:

All Calcium Carbide slag will be treated to neutralize any unreacted materials prior to the removal of this facility. All neutralized material will be disposed of in approved areas. The treatment area will be rinsed thoroughly with potable water.

RIN 768-94

FEB. 14, 1994

Decontamination of 1,1,1, Trichlorethane Storage Area:

Once the area is cleared of all 55 gallon drums, the walls and floor of the storage facility will be washed with a 5% alkaline detergent solution. The solution will be drawn off via vacuum pick-up and stored in a bulk tank for disposal. As a final step, the walls and floor will be steam cleaned to ensure removal of the material.

3. Decontamination of Paint Residue & Thinner Storage Facilities:

Once the area is cleared of all 55 gallon drums, the walls and floor of the storage facility will be washed with a 5% alkaline detergent solution. The solution will be drawn off via vacuum pick-up and stored in a bulk tank for disposal. As a final step, the walls and floor will be steam cleaned to ensure removal of the material.

4. Decontamination of Caustic Solution Storage Areas:

Once the area is cleared of all 55 gallon drums, the walls and floor of the storage facility will be washed with a 5% alkaline detergent solution. The solution will be drawn off via vacuum pick-up and stored in a bulk tank for disposal. As a final step, the walls and floor will be steam cleaned to ensure removal of the material.

USEPA FCIA REQUEST

RIM 78894 Cost Estimates for Closure (To be updated annually on April 1st) (1981 \$'s)

FEB. 14, 1994

Prepared by: Doyle Hansen, General Supt. Plant Engineering

<u>Area</u>	<u>Total Cost</u>	
A. 1,1,1, Trichlorethane Storage		
1) NICP	\$4000	
2) GICP	4000	
3) Saginaw Parts	<u>1500</u>	
Total		\$9500
B. Paint Residue & Thinners Storage		
1) NICP	\$4000	
2) GICP	4000	
3) Saginaw Parts	<u>1500</u>	
Total		\$9500
C. Caustic Solution Storage		
1) GICP Only	\$6000	\$6000
D. Calcium Carbide Slag Treatment		
	\$4500	<u>\$4500</u>
Total		\$29,500

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

ATTACHMENT III

Photographic Documentation of Closure Activities

DRAFT

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area



Nodular Iron Oil House, West Entrance (Prior to Cleaning Activities)

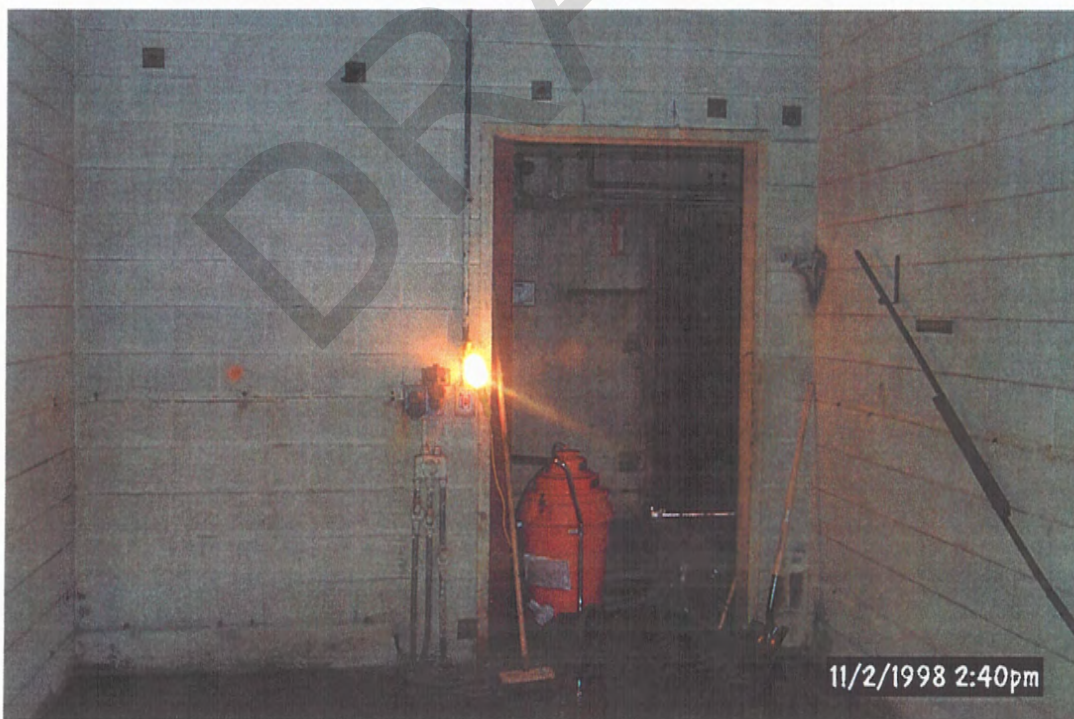


Nodular Iron Oil House, Viewing Southeast (Prior to Cleaning Activities)

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area



Nodular Iron Oil House, RCRA Storage Unit (Viewing South - Prior to Cleaning Activities)

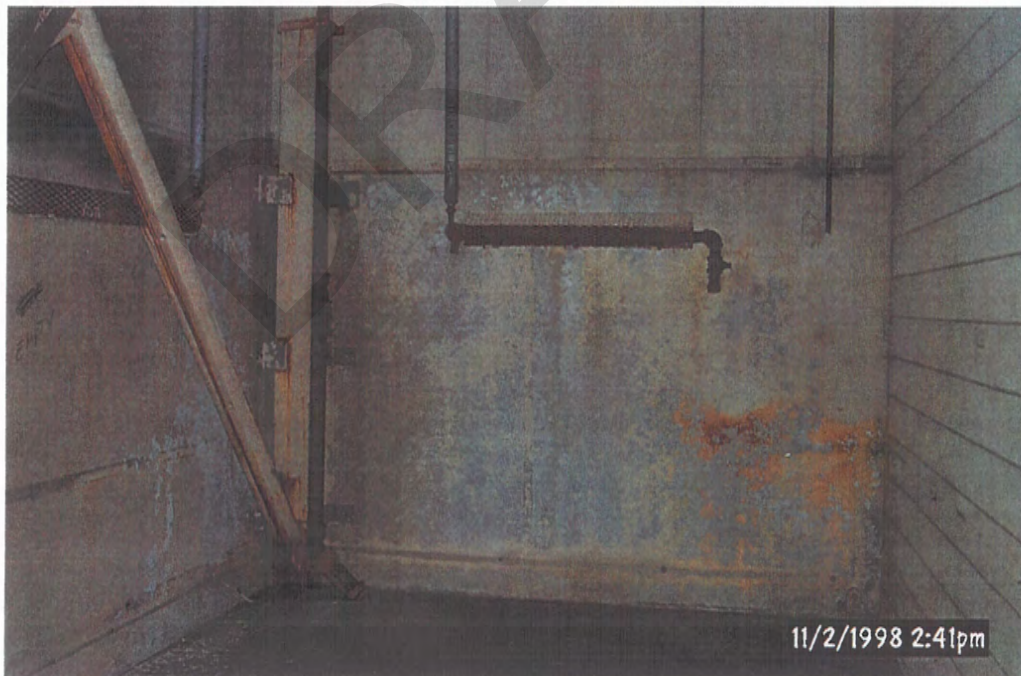


Nodular Iron Oil House, Inside RCRA Storage Unit (Viewing North - Prior to Cleaning Activities)

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

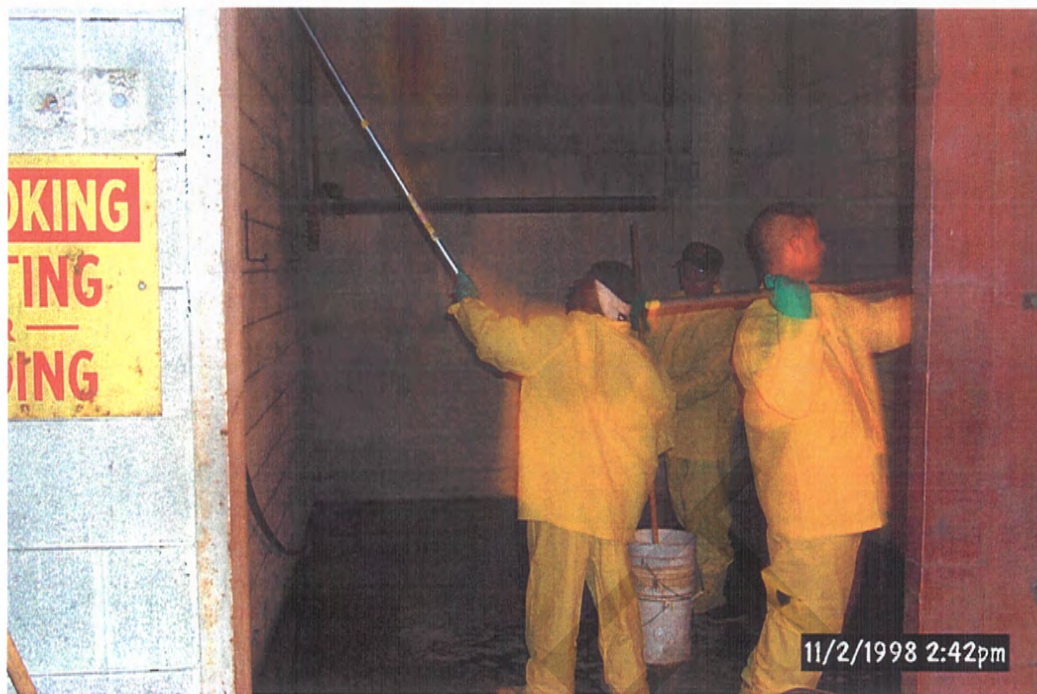


Inside Nodular Iron Oil House, Viewing East Outside of RCRA Storage Units (Prior to Cleaning Activities)

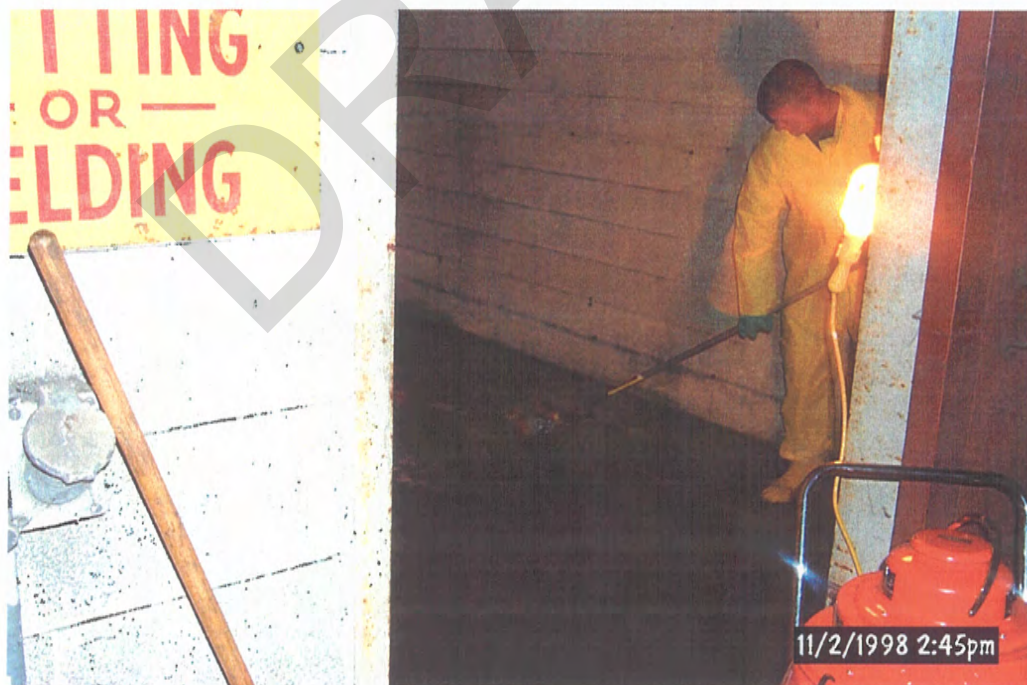


Nodular Iron Oil House, Inside RCRA Storage Unit (Viewing South - Prior to Cleaning Activities)

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

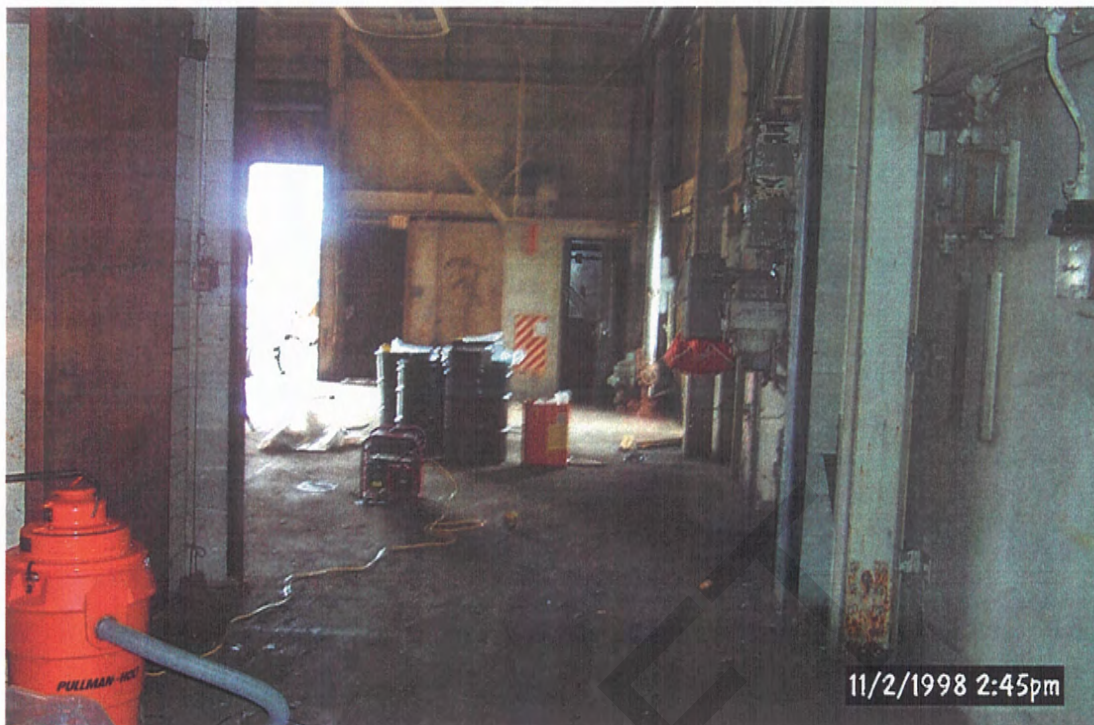


Nodular Iron Oil House, RCRA Storage Unit (Floor and Wall Scrubbing)



Nodular Iron Oil House, Vacuum Pick-Up of Wash Water

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area



Nodular Iron Oil House, Outside of RCRA Storage Units (Viewing West)

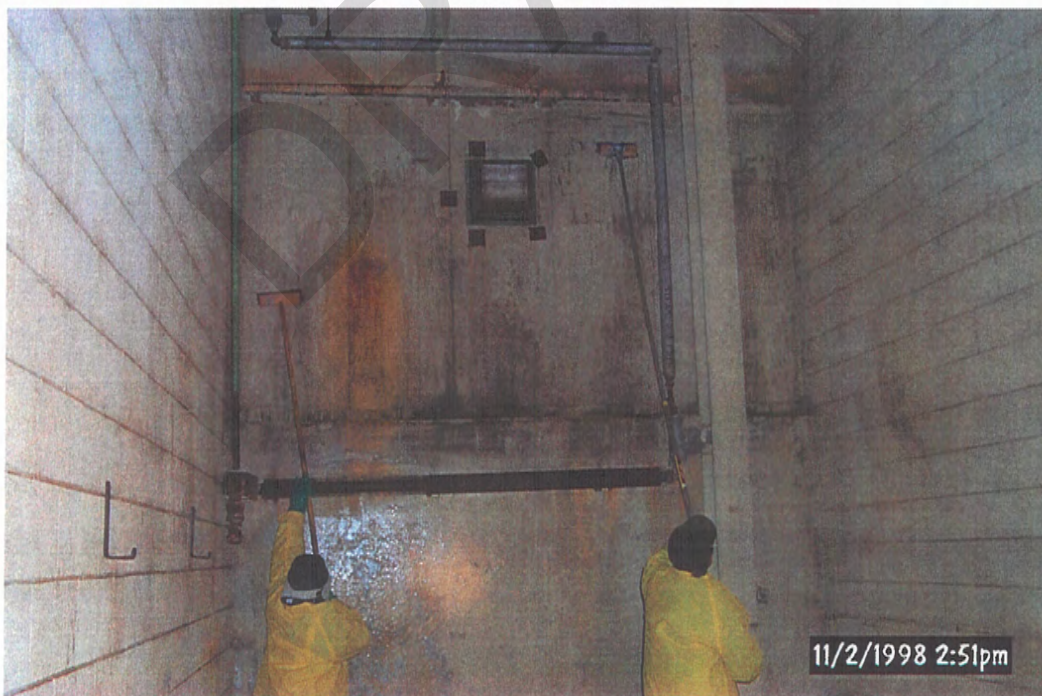


Nodular Iron Oil House, Inside RCRA Storage Unit (Viewing North - Prior to Cleaning Activities)

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area



Nodular Iron Oil House, RCRA Storage Unit (Viewing South - Prior to Cleaning Activities)



Nodular Iron Oil House, RCRA Storage Unit Wall Scrubbing (Viewing South)

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

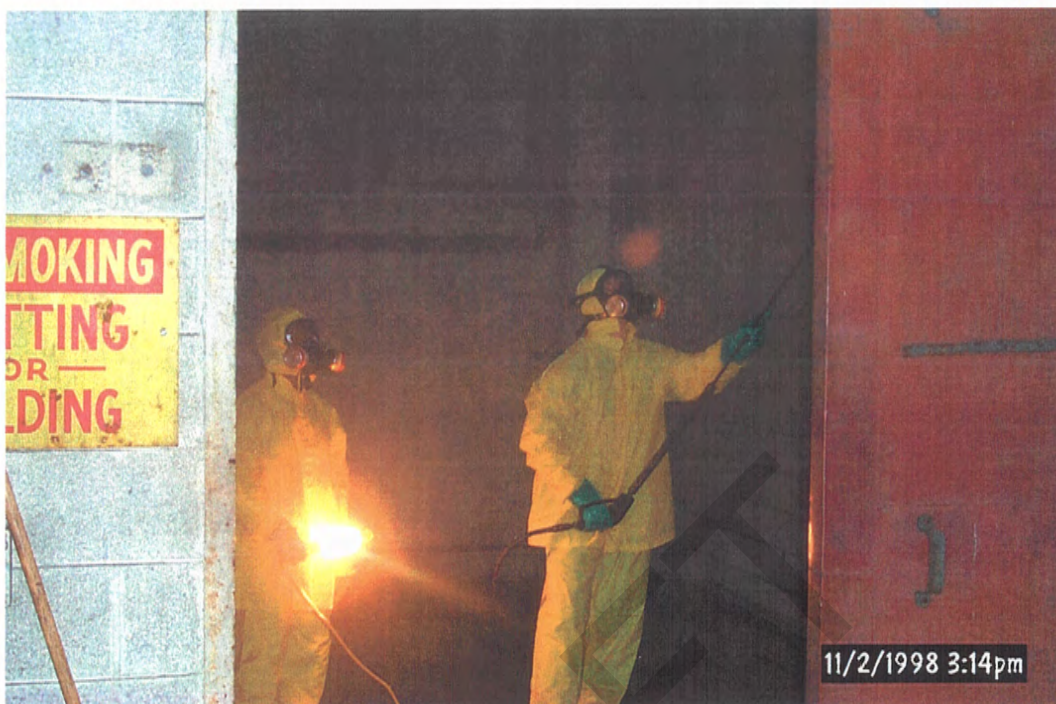


Nodular Iron Oil House, RCRA Storage Unit Wall Scrubbing (Viewing South)



Nodular Iron Oil House, RCRA Storage Unit Steam Cleaning After Scrubbing (Viewing South)

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area



Nodular Iron Oil House, Steam Cleaning RCRA Storage Unit (Viewing South)



Nodular Iron Oil House, RCRA Storage Unit After Steam Cleaning Activities (Viewing South)

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area



Nodular Iron Oil House, Vacuum Pick-Up of Wash Water After Steam Cleaning Activities (Viewing North)



Nodular Iron Oil House, Steam Cleaning RCRA Storage Unit (Viewing Southeast)

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

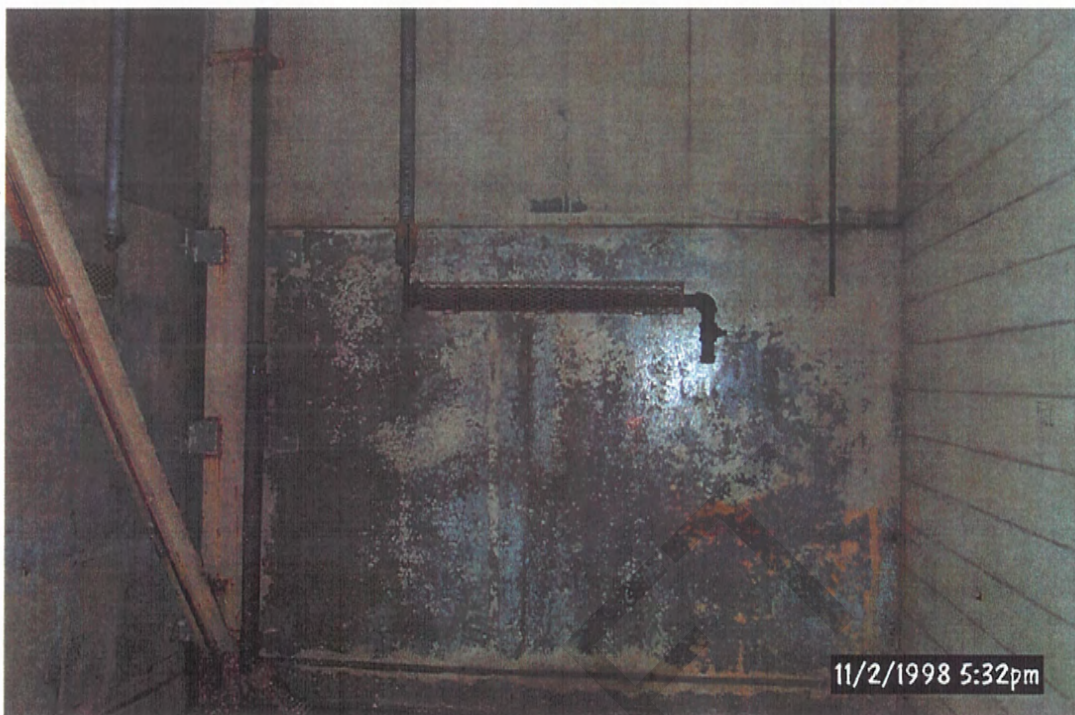


Nodular Iron Oil House, Vacuum Pick-Up of Wash Water (Viewing South)



Nodular Iron Oil House, Inside RCRA Storage Unit (Viewing North After Final Cleaning)

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area



Nodular Iron Oil House, Inside RCRA Storage Unit (Viewing South After Final Cleaning)

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

ATTACHMENT IV

Wastewater Characterization Analysis

DRAFT



1380 Busch Parkway
Buffalo Grove, Illinois 60089

Email: info@glalabs.com
(847) 808-7766 FAX (847) 808-7772

Date: November 16, 1998

Clean Harbors
11800 S. Stony Island Ave.
Chicago, IL 60617
Attention: John Behrens

Project: EMCON/General Motors

Enclosed are the results from 1 water sample received at Great Lakes Analytical on November 9, 1998. The requested analyses are listed below:


SAMPLE#	SAMPLE DESCRIPTION	DATE OF COLLECTION	TEST METHOD
8111831	Water: CH121333	11/3/98	TCLP RCRA Metals Flash Point, EPA ASTMD92-85 Reactive Cyanide, EPA 7.3.3 Reactive Sulfide, EPA 7.3.4 PCB, EPA 8082 TCLP VOC, EPA 8260 TCLP SVOC, EPA 8270 pH by EPA 9040

This report may not be reproduced, except in full, without the written approval of the laboratory.

Please contact me if you have any questions. In the meantime, thank you for the opportunity to work with you on this project.

Very truly yours,

GREAT LAKES ANALYTICAL


Kevin W. Keeley
Laboratory Director



Sampled: Nov 3, 1998
Received: Nov 9, 1998
Extracted: Nov 10, 1998
Analyzed: Nov 12, 1998
Reported: Nov 16, 1998



1380 Busch Parkway
Buffalo Grove, Illinois 60089

Email: info@glalabs.com
(847) 808-7766 FAX (847) 808-7772

Clean Harbors
11800 S. Stony Island Ave.
Chicago, IL 60617
Attention: John Behrens

Client Project ID: EMCON/General Motors
Sample Descript: Water
Analysis for: pH by EPA 9040
First Sample #: 811-1831

Sampled: Nov 3, 1998
Received: Nov 9, 1998
Analyzed: Nov 9, 1998
Reported: Nov 16, 1998

LABORATORY ANALYSIS FOR: pH by EPA 9040

Sample Number	Sample Description	Sample Result pH units	Temperature °C
811-1831	CH121333	8.3	22

DRAFT

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

8111831.chs <2>



**GREAT
LAKES
ANALYTICAL**

1380 Busch Parkway
Buffalo Grove, Illinois 60089

Email: info@glalabs.com
(847) 808-7766 FAX (847) 808-7772

Clean Harbors
11800 S. Stoney Island Ave.
Chicago, IL 60617
Attention: John Behrens

Client Project ID: EMCON/General Motors
Sample Descript: Water: CH121333
Lab Number: 811-1831

Sampled: Nov 3, 1998
Received: Nov 9, 1998

Analyzed: Nov 9, 1998
Reported: Nov 16, 1998

LABORATORY ANALYSIS

Analyte	EPA Method	Sample Results
Flash Point, Closed Cup(F).....	ASTMD93-85	> 200

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

8111831.chs <3>

Accreditations/Certifications: Delaware IL 069 Illinois EPA-100261 New Jersey DEP-54001 New York DOH-11437
 DC-101141 Tennessee DEC-15495 Virginia 20161 Wisconsin DNR 88991120



1380 Busch Parkway
Buffalo Grove, Illinois 60089

Email: info@glalabs.com
(847) 808-7766 FAX (847) 808-7772

Clean Harbors
11800 S. Stony Island Ave.
Chicago, IL 60617
Attention: John Behrens

Client Project ID: EMCON/General Motors
Sample Descript: Water:: CH121333
Lab Number: 811-1831

Sampled: Nov 3, 1998
Received: Nov 9, 1998
Analyzed: Nov 11, 1998
Reported: Nov 16, 1998

LABORATORY ANALYSIS

Analyte	EPA Method	Detection Limit mg/L	Sample Results mg/L
Reactive Cyanide.....	7.3.3	0.010	N.D.
Reactive Sulfide.....	7.3.4	6.5	N.D.

DRAFT

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL


Kevin W. Keeley
Laboratory Director

8111831.chs <4>



1380 Busch Parkway
Buffalo Grove, Illinois 60089

Email: info@glalabs.com
(847) 808-7766 FAX (847) 808-7772

Clean Harbors
11800 S. Stony Island Ave.
Chicago, IL 60617
Attention: John Behrens

Client Project ID: EMCON/General Motors
Sample Descript: Water: CH121333
Analysis Method: EPA 8082
Lab Number: 811-1831

Sampled: Nov 3, 1998
Received: Nov 9, 1998
Extracted: Nov 10, 1998
Analyzed: Nov 10, 1998
Reported: Nov 16, 1998

POLYCHLORINATED BIPHENYLS (EPA 8082)

Analyte	Detection Limit $\mu\text{g/L}$	Sample Results $\mu\text{g/L}$
PCB 1016.....	1.0	N.D.
PCB 1221.....	1.0	N.D.
PCB 1232.....	1.0	N.D.
PCB 1242.....	1.0	N.D.
PCB 1248.....	1.0	N.D.
PCB 1254.....	1.0	N.D.
PCB 1260.....	1.0	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

8111831.chs <5>



1380 Busch Parkway
Buffalo Grove, Illinois 60089

Email: info@glalabs.com
(847) 808-7766 FAX (847) 808-7772

Clean Harbors
11800 S. Stoney Island Ave.
Chicago, IL 60617
Attention: John Behrens

Client Project ID: EMCON/General Motors
Sample Descript: TCLP Extract: CH121333
Analysis Method: EPA 8260
Lab Number: 811-1831

Sampled: Nov 3, 1998
Received: Nov 9, 1998
Analyzed: Nov 13, 1998
Reported: Nov 16, 1998

TCLP VOLATILES

Analyte	Detection Limit mg/L	Sample Results mg/L
Benzene.....	0.40	N.D.
Carbon tetrachloride.....	0.40	N.D.
Chlorobenzene.....	0.40	N.D.
Chloroform.....	0.40	N.D.
1,2-Dichloroethane.....	0.40	N.D.
1,1-Dichloroethylene.....	0.40	N.D.
Methyl ethyl ketone.....	100	N.D.
Tetrachloroethylene.....	0.40	N.D.
Trichloroethylene.....	0.40	N.D.
Vinyl chloride.....	0.16	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL


Kevin W. Keeley
Laboratory Director

8111831.chs <6>



1380 Busch Parkway
Buffalo Grove, Illinois 60089

Email: info@glalabs.com
(847) 808-7766 FAX (847) 808-7772

Clean Harbors
11800 S. Stony Island Ave.
Chicago, IL 60617
Attention: John Behrens

Client Project ID: EMCON/General Motors
Sample Descript: TCLP Extract: CH121333
Analysis Method: EPA 8270
Lab Number: 811-1831

Sampled: Nov 3, 1998
Received: Nov 9, 1998
Extracted: Nov 13, 1998
Analyzed: Nov 14, 1998
Reported: Nov 16, 1998

TCLP SEMI-VOLATILES

Analyte	Detection Limit mg/L	Sample Results mg/L
o-Cresol.....	20	N.D.
m-, p-Cresol.....	20	N.D.
Cresol.....	20	N.D.
1,4-Dichlorobenzene.....	0.75	N.D.
2,4-Dinitrotoluene.....	0.020	N.D.
Hexachlorobenzene.....	0.020	N.D.
Hexachloro-1,3-butadiene.....	0.050	N.D.
Hexachloroethane.....	0.30	N.D.
Nitrobenzene.....	0.20	N.D.
Pentachlorophenol.....	10	N.D.
Pyridine.....	0.50	N.D.
2,4,5-Trichlorophenol.....	40	N.D.
2,4,6-Trichlorophenol.....	0.20	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

Kevin W. Keefe
Laboratory Director

8111831.chs <7>



Sample Custodian (617) 848-1800

Page 101

Date: 11/3/98

Phone #:

Date Samples Received:

NOTE: Samples received unpreserved will be preserved upon arrival at CHAS

Samples were: Preserved Underserved

CH 119

CLOSURE CERTIFICATION REPORT
Nodular Iron Oil House RCRA Hazardous Waste Storage Area

ATTACHMENT V

Waste Disposal Manifests

DRAFT



PLEASE TYPE

(Form designed for use on elite (12-pitch) typewriter.)

UNIFORM WASTE MANIFEST		1. Generator's US EPA ID No. N/A		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address General Motors Corporation PO Box 5079 1629 N Washington Saginaw, MI 48605				Location If Different		A. Illinois Manifest Document Number IL 7734497	
4. "24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS" 1-800-645-8265				6. US EPA ID Number		B. Illinois Generator's ID 9260019999	
5. Transporter 1 Company Name Clean Harbors Env. Services, Inc.				8. US EPA ID Number MA0039322250		C. Illinois Transporter's ID 7818491800	
7. Transporter 2 Company Name				10. US EPA ID Number		D. Transporter's Phone 1478	
9. Designated Facility Name and Site Address Clean Harbors Services, Inc. 11800 South Stony Island Ave. Chicago, Illinois 60617				12. Containers No. Type		E. Illinois Transporter's ID 03160010051	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				13. Total Quantity		F. Facility's Phone (773) 646-6202	
a. Non DOT Regulated material, Non DOT Hazardous, UN002				14. Unit W/Vol 00,17,06		Waste No. XX CLASS 14	
b.				15. EPA HW Number		Authorization Number	
c.				16. EPA HW Number		Authorization Number	
d.				17. EPA HW Number		Authorization Number	
J. Additional Description for Materials Listed Above 11a. CH121333				K. Handling Codes for Wastes Listed Above in Item #14			
15. Special Handling Instructions and Additional Information 2 55 GAC DRUMS. PLACED INTO 2-PAY OVERPACKS, WO# IL147635							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name Gilbert Jensen				Signature <i>Gilbert Jensen</i>		Date 01/21/99	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>Richard W. Peppers</i>		Date 01/21/99	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of materials materials covered by this manifest except as noted in item 19.						Date	
Printed/Typed Name JOSEF AREVALO				Signature <i>Josef Arevalo</i>		Date 01/22/99	

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

Nodular Iron Plant Oil House

Pictures of RCRA Pad cleaning
November 2, 1998
Clean Harbors

j:\84068063\005\photos\

P0000362.jpg → P0000384.jpg

7/18/99

RCRA Report

& from Jean

✓① Cert. 1 sig. PE
1 sig. GM - NO NAME

② AH. I permit
NPDES excl. only - take out

✓③ 1-1 CFR 265 not 264
Subpart G (interim status
RCRA Storage Area)
MDNR Resource(s) placed

✓④ 3-1 3 IP 1st Sect.
O.T. House gone was demo'd after
clean-up

✓⑤ Substantial conformance
→ delete

Need to respond to TM letter from EPA
Peter Booth

- ✓ - make A's
- cover letter to Steve Budda
- ✓ - Remove Draft & Privileged
- ✓ - 009 / RCRA

Attachment C

Certificate of Final Closure of Hazardous Waste Management Units

MDEQ/WHMD

Fax:517-373-4797

Feb 27 '04 16:26

P.02



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

February 27, 2004

CERTIFIED MAIL

Ms. Cheryl R. Hiatt, Project Coordinator
General Motors Corporation
Worldwide Facilities Group - Remediation Team
Troy Technology Park South - Building A
Mail Code: 483-619-356
1996 Technology Drive
Troy, Michigan 48083

Dear Ms. Hiatt:

SUBJECT: Certification of Final Closure of Hazardous Waste Management Units
General Motors Corporation, Saginaw Metal Casting Operations.
MID 041 793 340

The Michigan Department of Environmental Quality (MDEQ), Waste and Hazardous Materials Division (WHMD), has completed its review of the certifications of closure for the General Motors Corporation (GMC), Saginaw Metal Casting Operations (Facility) based upon the information provided in your April 28, 2003, letter to Ms. Cheryl Howe. Previous closure certification information was submitted on November 6, 1989, October 30, 1991, January 9, 2001, and September 11, 2001. The four hazardous waste management units covered by these closure certifications are the Hazardous Waste Control Tank, the Paint Storage Building Drum Storage Area, the Old Calcium Carbide Desulfurization Slag Treatment Unit, and the Existing Calcium Carbide Desulfurization Slag Treatment Unit. Based on this review, the GMC is hereby released from its closure responsibilities for the four hazardous waste management units at the Facility under Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and its administrative rules, Michigan Administrative Code R 299.9101 et seq. The GMC is, therefore, no longer required to demonstrate financial capability for closure and liability coverage of the four hazardous waste management units at the Facility.

Facility Status

With this acceptance of the certification of closure, the Facility can no longer be operated as a hazardous waste treatment, storage, or disposal facility. If hazardous waste is generated at the Facility, it must be managed in accordance with all applicable generator requirements in R 299.9301 through R 299.9312.

Financial Capability

The GMC demonstrates financial assurance for closure of the Facility by use of Surety Bond Number M2022532. In accordance with R 299.9703(5), this acceptance of the certification of closure constitutes a release from the requirement to maintain such financial assurance for the Facility. The bond also includes financial assurance for post-closure of:

Mrs. Cheryl R. Hiatt

2

February 27, 2004

the Facility. The need for any long-term post-closure exposure controls or monitoring is being deferred to corrective action. At this time, the United States Environmental Protection Agency (U.S. EPA) is the lead regulatory agency for the Facility's corrective action requirements. By separate letter, the MDEQ will authorize the cancellation of the bond.

The GMC demonstrates financial responsibility for liability coverage of the Facility by use of an insurance policy. In accordance with R 299.9710(16), this acceptance of the certification of closure constitutes a release from the requirement to maintain such financial responsibility. The GMC is no longer required to include the Facility on the insurance endorsement used to demonstrate the required liability coverage.

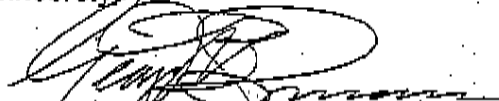
Corrective Action

This acceptance of the certification of closure does not constitute a release from any corrective action responsibilities that the GMC may have under Part 111 or under the federal Resource Conservation and Recovery Act of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984. In addition to the responsibility to close regulated hazardous waste management units, owners and operators are responsible to conduct corrective actions for releases of hazardous wastes and hazardous waste constituents from waste management units.

The MDEQ has not received the deed notice for the Facility as required by R 299.9525. This violation has been entered into the MDEQ's Waste Data System, which also is reflected in the U.S. EPA's Enforcement and Compliance History Online system. This deed notice must be filed as soon as possible. For more information, please contact Mr. Clay Spencer, Hazardous Waste and Radiological Protection Section (HWRPS), WHMD, at 517-373-7968.

If you have any questions regarding this letter, please contact Ms. Howe, HWRPS, at 517-373-9881.

Sincerely,



George W. Bruchmann, Chief
Waste and Hazardous Materials Division
517-373-9523

cc: Mr. William McFarland, GMC
Mr. Peter Ramanauskas, U.S. EPA
Ms. Liane Shekter Smith, MDEQ
Mr. Stephen Buda, MDEQ
Ms. De Montgomery, MDEQ
Mr. Terry Walkington, MDEQ
Mr. Steve Sliver, MDEQ
Ms. Cheryl Howe, MDEQ
Mr. Clay Spencer, MDEQ
Mr. Ron Stone, MDEQ
Base File

Attachment D

RFI Databox Figures

Chemical Name	A	B	C	D
1,1-Dichloroethene	5.70E+02	7.80E+04	1.50E+01	3.30E+01
1,2-Dichloroethene	5.50E+02	1.20E+05	5.10E+01	7.40E+02
2,4-Dimethylphenol	3.60E+04	2.10E+05	-	-
2-Butanone (Methyl Ethyl Ketone)	2.70E+04	2.90E+07	3.50E+04	2.70E+04
Aluminum	3.70E+05	-	-	-
Antimony	6.70E+02	5.90E+03	-	-
Arsenic	3.70E+01	9.10E+02	-	-
Benzene	4.00E+02	4.70E+05	9.90E+01	8.40E+00
Benzofluoranthene	8.00E+01	-	-	-
Benzofluorene	8.00E+01	1.90E+03	-	-
Benzofluoranthene	8.00E+01	-	-	-
Benzofluoranthene	8.00E+01	3.50E+05	-	-
Benzofluoranthene	8.00E+01	-	-	-
Beryllium	1.60E+03	5.90E+02	-	-
Bis(2-Ethylhexyl)phthalate	1.00E+04	8.90E+02	-	-
Cadmium	2.10E+03	2.20E+03	-	-
Carbazole	2.40E+03	-	-	-
Chromium III (Trivalent)	1.00E+08	1.50E+05	-	-
Chromium Total	9.20E+03	2.40E+02	-	-
Chromium VI (Hexavalent)	9.20E+03	2.40E+02	-	-
Chrysene	8.00E+03	-	-	-
cis-1,2-Dichloroethene	6.40E+02	1.00E+06	4.30E+02	4.10E+01
Cobalt	9.00E+03	5.90E+02	-	-
Cyanide (total)	2.50E+02	2.50E+02	-	-
Dibenz(a,h)anthracene	8.00E+00	-	-	-
Ethylbenzene	1.40E+02	1.30E+07	3.10E+03	1.40E+02
Fluoranthene	1.30E+05	4.10E+06	8.80E+05	1.00E+06
Formaldehyde	6.00E+04	3.00E+05	6.90E+01	6.90E+01
Indeno(1,2,3-cd)pyrene	8.00E+01	-	-	-
Iron	5.80E+05	-	-	-
Lead	9.00E+02	4.40E+04	-	-
Manganese	9.00E+04	1.50E+03	-	-
Mercury	5.80E+02	8.80E+03	6.20E+01	8.90E+01
Methylphenol (Cresol)	3.60E+04	2.90E+05	-	-
Naphthalene	5.20E+04	8.80E+04	3.50E+02	4.70E+02
Nickel	1.50E+05	1.60E+04	-	-
Perfluorooctanoic acid	3.20E+02	1.30E+05	-	-
pH Field	-	-	-	-
Phenanthrene	5.20E+03	2.90E+03	1.90E+02	5.10E+03
Phenol	1.20E+04	1.80E+07	-	-
Selenium	9.00E+03	5.90E+04	-	-
Total PCBs	1.60E+01	6.50E+03	2.80E+04	1.60E+04
Trichloroethene	5.00E+02	2.30E+06	4.40E+02	3.70E+01
Vanadium	5.00E+03	-	-	-
Vinyl chloride	3.40E+01	8.90E+05	1.70E+02	2.80E+00
Xylene (total)	1.50E+02	1.30E+08	6.50E+04	1.50E+02
Zinc	6.30E+05	-	-	-

A Michigan Part 201 Industrial and Commercial II Direct Contact Criteria
B Michigan Part 201 Soil Industrial commercial II, III and IV particulate inhalation criteria
C Michigan Part 201 Soil Industrial commercial II, III and IV SV volatilization to ambient air criteria
D Michigan Part 201 Soil Industrial commercial II, III and IV volatilization to indoor air criteria

SB-04836a	12/5/01	12/5/01
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)
Arsenic	3.1 U	0.6 J

B-8 (2000-G)	11/29/00
Arsenic	0.2 (ft BGS)
Chromium Total	1.5
Manganese	47.8
Total PCBs	1260
	0.1 U

SB-04835A	1/11/05	1/11/05
Chromium III (Trivalent)	46.8 J	44.1 J
Chromium Total	Spec	Spec
Chromium VI (Hexavalent)	0.7 U	0.7 U

SB-04835B	1/11/05	1/11/05
Chromium III (Trivalent)	16.1 J	15.5 J/14.6 J
Chromium Total	Spec	Spec
Chromium VI (Hexavalent)	0.7 U	0.7 U/0.7 U

TMW-04635	3/6/03	3/6/03	3/6/03	3/6/03
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)	8-10 (ft BGS)	16-18 (ft BGS)
Chromium Total	1.4	1.1	4	3.6
Manganese	309 (B)	16.6	58 J	13.1
Total PCBs	855 J	126 J	403 J	189 J
	0.11 J	0.38 U	0.5 U	0.37 U

B-7 (2000-G)	11/29/00
Arsenic	1-2.5 (ft BGS)
Chromium Total	0.9 J/1 J
Manganese	13.5/13.8
Total PCBs	114/159
	0.1 U/0.1 U

B-9 (2000-G)	11/29/00
Arsenic	1-3 (ft BGS)
Chromium Total	1.7
Manganese	17.1
Total PCBs	304
	0.1 U

B-10 (2000-G)	11/29/00
Arsenic	4-6 (ft BGS)
Chromium Total	1.3
Manganese	10.7
Total PCBs	101
	0.1 U

TMW-04135	3/6/03	3/6/03	3/6/03
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)	8-10 (ft BGS)
Chromium Total	1.8	2.6	1.9
Manganese	274 J	229 J	152 J
Total PCBs	0.0719 J	0.38 U	0.39 U

SB-04435	12/9/02	12/9/02
Total PCBs	0.12 U	0.12 U

SB-04634B	3/7/03	3/7/03
Total PCBs	0.4 U	0.0514 J

SB-04335	3/6/03	3/6/03
Total PCBs	0.108 J	0.39 U

SB-04534D	12/10/01	12/9/02	12/10/01	12/9/02	12/10/01	12/9/02	12/9/02
Total PCBs	0.2 (ft BGS)	2.4 (ft BGS)	2.4 (ft BGS)	4-6 (ft BGS)	4-6 (ft BGS)	6-8 (ft BGS)	6-8 (ft BGS)
	1.11 J	0.539 J	13.4 J	0.282 J/0.257 J	4.04 J/5.24 J	0.12 U	0.12 U

SB-04434	9/15/98	12/9/02	12/9/02	9/15/98	12/9/02	12/9/02	9/15/98
Arsenic	0.2 (ft BGS)	0.2 (ft BGS)	2.4 (ft BGS)	4-6 (ft BGS)	4-6 (ft BGS)	6-8 (ft BGS)	13-15 (ft BGS)
Chromium Total	2	-	-	3	-	-	5
Manganese	9 J	-	-	25 J	-	-	14 J
Total PCBs	212 J	0.4 J	0.46 J	200 J	0.53 J	0.49 J	344 J
	0.4 J	0.46 J	0.27 J	0.85 J	0.53 J	0.49 J	0.1 U

SB-04334	12/9/02	12/9/02	12/9/02	12/9/02
Total PCBs	0.56 J	0.89 J	0.43 J	0.13 U

SB-04333B	12/9/02	12/9/02
Total PCBs	0.31 J	1.05 J

SB-04333D	12/4/01	12/4/01
Total PCBs	9.7 J/11.2 J	0.82 J

SB-04333c	12/4/01	12/4/01
Total PCBs	1.36 J/0.79 J	0.43 J

TMW-04130	3/6/03	3/6/03	3/6/03	3/6/03
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)	8-10 (ft BGS)	16-20 (ft BGS)
Chromium Total	1.2	2.4	1.7	4.8
Manganese	88.8	21.6	12.1	7.3
Total PCBs	1220 J	282 J	246 J	160 J
	0.38 U	0.48 U	0.41 U	0.49 U

SB-04332B	3/6/03	3/6/03
Total PCBs	0.079 J	0.0729 J

TMW-04127	3/6/03	3/6/03	3/6/03
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)	8-10 (ft BGS)
Chromium Total	1.4	1.4/1.4	1.8
Manganese	1580 J	825 J/901 J	77.2 J
Total PCBs	0.38 U	0.35 U/0.35 U	0.41 U

TMW-04332	12/9/02	12/9/02	12/9/02
Total PCBs	0.2 (ft BGS)	2.4 (ft BGS)	4-6 (ft BGS)
	1.09 J	0.13 U	0.17 U

SB-04432	12/9/02	12/9/02
Total PCBs	0.2 (ft BGS)	2.4 (ft BGS)
	0.263 J/0.257 J	0.13 U/0.12 U

SB-04433b	12/4/01	12/4/01
Total PCBs	4.86 J	0.51 J

TMW-04531	3/7/03	3/7/03	3/7/03
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)	8-10 (ft BGS)
Chromium Total	4.5	0.79	3.8
Manganese	23.8	17.5	37.8
Total PCBs	208 J	310 J	796 J
	0.54 U	0.38 U	0.43 U

TMW-04628	3/7/03	3/7/03	3/7/03	3/7/03
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)	8-10 (ft BGS)	16-20 (ft BGS)
Chromium Total	1.1	0.44	1.2	6.7
Manganese	20.4	6.7	1.5	13.3
Total PCBs	440 J	89.7 J	180 J	452 J
	0.35 U	0.38 U	0.48 U	0.74 U

SB-04533c	12/5/01	12/5/01
Total PCBs	0.2 (ft BGS)	2.4 (ft BGS)
	1.04 J	0.356 J

SB-04834	12/9/02	12/9/02
Total PCBs	0.417 J	0.336 J

SB-04834b	12/10/01	12/10/01
Total PCBs	0.2 (ft BGS)	4-6 (ft BGS)
	1.38 J	0.329 J

MW-04831	9/10/98	9/10/98	9/10/98	9/10/98
Arsenic	0.2 (ft BGS)	6-8 (ft BGS)	24-26 (ft BGS)	28-28 (ft BGS)
Chromium Total	10	6	2	5
Manganese	126	86	146 J	247 J
Total PCBs	0.1 U	0.1 U	0.1 U	0.1 U

SB-04534c	12/10/01	12/10/01
Total PCBs	0.2 (ft BGS)	4-6 (ft BGS)
	0.263 J	0.13 U

SB-04433a	12/4/01	12/4/01
Total PCBs	0.2 (ft BGS)	4-6 (ft BGS)
	0.82 J	0.34 J

SB-04533a	12/10/01	12/10/01
Total PCBs	0.2 (ft BGS)	4-6 (ft BGS)
	0.316 J	0.275 J

SB-04533b	12/5/01	12/5/01
Total PCBs	0.2 (ft BGS)	2.4 (ft BGS)
	0.38 J	0.89 J

SB-04533d	12/5/01	12/5/01
Total PCBs	0.2 (ft BGS)	2.4 (ft BGS)
	0.316 J/0.329 J	1.36 J

SB-05036c	12/11/01	12/11/01
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)
	2.6	2.5

SB-05036d	12/6/01	12/6/01
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)
	0.7 J/0.7 J	0.8 J

SB-05036e	12/6/01	12/6/01
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)
	2.6 J	3.5

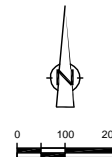
SB-05036f	12/6/01	12/6/01
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)
	1.3 J	1.4 J

SB-05036h	12/6/01	12/6/01
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)
	2.4 J	4.4

MW-05036	10/30/98	10/30/98	10/30/98
Arsenic	0.2 (ft BGS)	4-6 (ft BGS)	30-32 (ft BGS)
Chromium Total	2	4	4/5
Manganese	69	71	12/13
Total PCBs	1100	1200	214/215
	0.1 U	0.1 U	0.1 U/0.1 U

TMW-05035	3/6/03	3/6/03	3/6/03
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)	8-10 (ft BGS)
Chromium Total	0.51	2.3	0.83
Manganese	43.5	62.9	7.4
Total PCBs	1230 J	1130 J	83.1 J
	0.4 U	0.071 J	0.4 U

TMW-05032	3/7/03	3/7/03	3/7/03	3/7/03
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)	8-10 (ft BGS)	16-20 (ft BGS)
Chromium Total	2.3	1.1	5.1	3.5
Manganese	1250 J	300 J	722 J	182 J
Total PCBs	0.047 J	0.39 U	0.8 U	0.43 U



LEGEND

A-- INVESTIGATIVE UNIT BOUNDARY AND IDENTIFIER

● MONITORING WELL LOCATION - RFI

■ SOIL BORING LOCATION - RFI

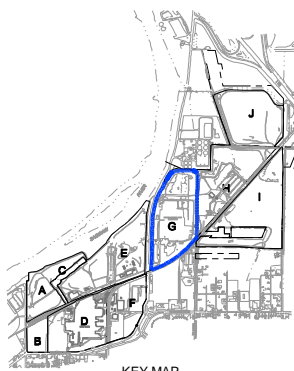
● SAMPLE LOCATION - NO REPORTED DATA

■ SOIL BORING LOCATION - HISTORICAL

● MONITORING WELL LOCATION - HISTORICAL

SB-04836a	12/5/01	12/5/01
Arsenic	0.2 (ft BGS)	2.4 (ft BGS)
Arsenic	ND (3.1) U	0.6 J
		RESULT (mg/kg)
		PARAMETER

- NOTES:**
- TOTAL PCBs WERE SUMMED BY ADDING THE POSITIVE DETECTIONS PLUS HALF THE QUANTITATION LIMITS FOR NON-DETECT RESULTS OF AROCLORS DETECTED ELSEWHERE AT THE SITE. IF QUANTITATION LIMITS ARE NOT AVAILABLE, HALF THE REPORTING LIMITS ARE USED FOR NON-DETECTED VALUES.
 - SCREENING CRITERIA AND SAMPLE RESULTS ARE COMPARED TO TWO SIGNIFICANT DIGITS. RESULTS EQUAL TO SCREENING CRITERIA ARE NOT HIGHLIGHTED AS EXCEEDANCES.
 - DATABASE ANALYTE LIST DEVELOPED BASED ON A MINIMUM OF ONE EXCEEDANCE OF SCREENING CRITERIA PER INVESTIGATIVE UNIT PER MATRIX (i.e. SOIL OR GROUNDWATER). TOTAL PCBs ARE PRESENTED FOR ALL LOCATIONS SAMPLED. IU SPECIFIC ANALYTES NOT ANALYZED FOR AT A GIVEN LOCATION ARE OMITTED FROM THE CORRESPONDING DATABASE. SPEC INDICATES THAT THE TOTAL CHROMIUM CONCENTRATION HAS BEEN SPECIATED, USING THE HEXAVALENT CHROMIUM RESULTS TO CALCULATE THE TRIVALENT CHROMIUM CONCENTRATION.



SCALE VERIFICATION

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

GENERAL MOTORS CORPORATION
SAGINAW METAL CASTING OPERATIONS

SAGINAW, MICHIGAN

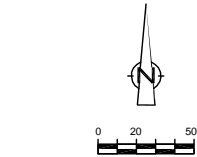
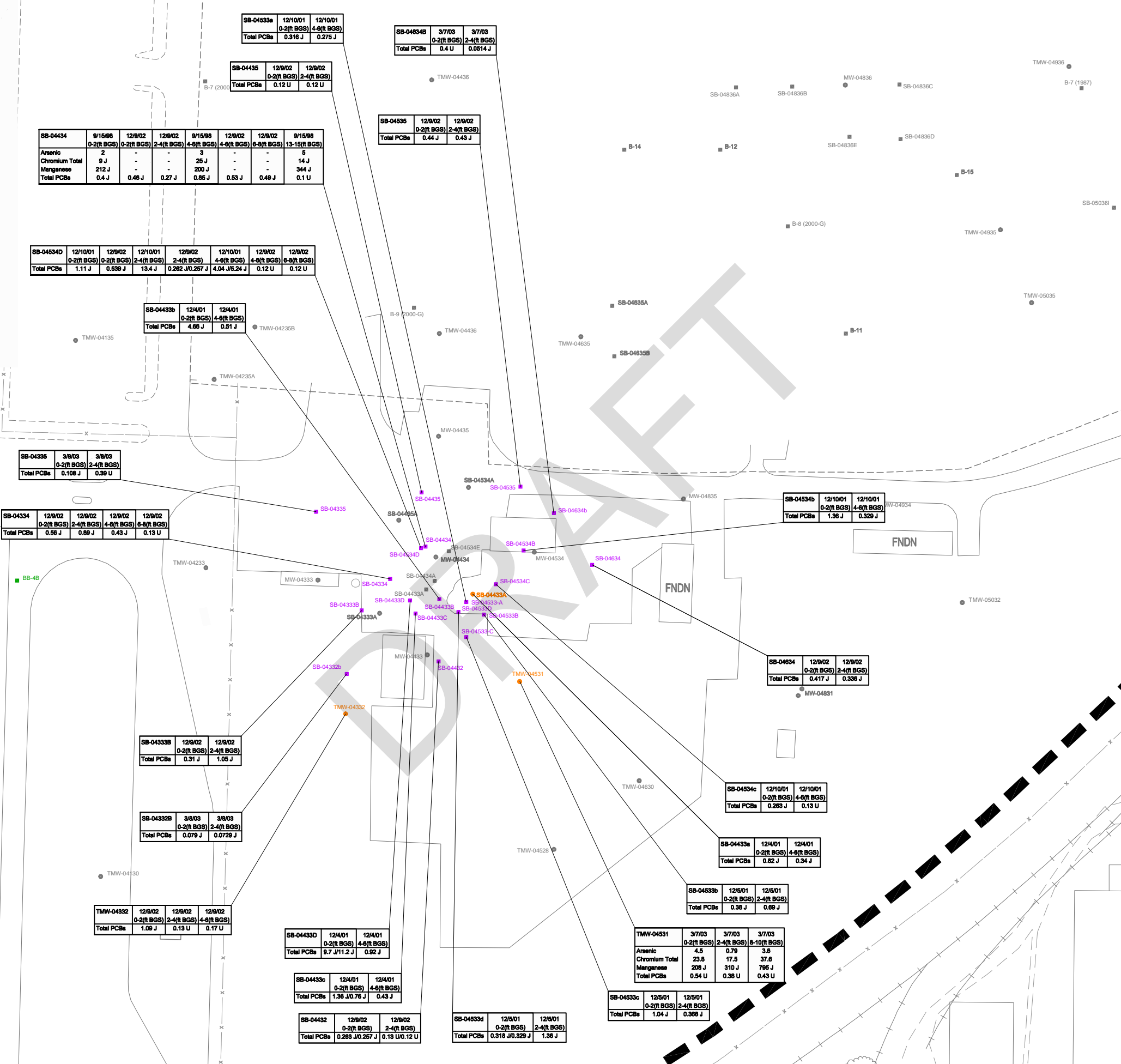
INVESTIGATIVE UNIT G - SOUTH
RFI PHASE 1C - SOIL



CONESTOGA-ROVERS &

Chemical Name	A	B	C	D
1,1-Dichloroethene	5.70E+02	7.80E+04	1.50E+01	3.30E+01
1,2-Dichloroethene	5.50E+02	1.20E+05	5.10E+01	7.40E+00
2,4-Dimethylphenol	3.65E+04	2.10E+05	-	-
2-Butanone (Methyl Ethyl Ketone)	2.70E+04	2.90E+07	3.50E+04	2.70E+04
Aluminum	3.70E+05	-	-	-
Antimony	6.70E+02	5.90E+03	-	-
Arsenic	3.70E+01	9.10E+02	-	-
Benzene	4.00E+02	4.70E+05	9.90E+01	8.40E+00
Benzo(a)anthracene	8.00E+01	-	-	-
Benzo(a)pyrene	8.00E+00	1.90E+03	-	-
Benzo(b)fluoranthene	8.00E+01	-	-	-
Benzo(k)fluoranthene	7.00E+03	3.50E+05	-	-
Benzo(k)fluoranthene	8.00E+02	-	-	-
Beryllium	1.60E+03	5.90E+02	-	-
Butyl Ethylhexylphthalate	1.00E+04	8.90E+02	-	-
Cadmium	2.10E+03	2.20E+03	-	-
Carbazole	2.40E+03	-	-	-
Chromium III (Trivalent)	1.00E+08	1.50E+05	-	-
Chromium Total	9.20E+03	2.40E+02	-	-
Chromium VI (Hexavalent)	9.20E+03	-	-	-
Chrysene	8.00E+03	-	-	-
cis-1,2-Dichloroethene	6.40E+02	1.00E+06	4.30E+02	4.10E+01
Cobalt	9.00E+03	5.90E+02	-	-
Cyanide (total)	2.50E+02	2.50E+02	-	-
Dibenz(a,h)anthracene	8.00E+00	-	-	-
Ethylbenzene	1.40E+02	1.30E+07	3.10E+03	1.40E+02
Fluoranthene	1.20E+05	4.10E+06	8.80E+05	1.00E+06
Formaldehyde	6.00E+04	3.00E+05	6.90E+01	6.90E+01
Indeno(1,2,3-cd)pyrene	8.00E+01	-	-	-
Iron	5.80E+05	-	-	-
Lead	9.00E+02	4.40E+04	-	-
Manganese	9.00E+04	1.50E+03	-	-
Mercury	5.80E+02	8.80E+03	-	-
Methylphenol (Cresol)	3.65E+04	2.90E+05	6.20E+01	8.90E+01
Naphthalene	5.20E+04	8.80E+04	3.50E+02	4.70E+02
Nickel	1.50E+05	1.60E+04	-	-
Pentachlorophenol	3.20E+02	1.30E+05	-	-
pH Field	-	-	-	-
Phenanthrene	5.20E+03	2.90E+03	1.90E+02	5.10E+03
Phenol	1.20E+04	1.80E+07	-	-
Selenium	9.00E+03	5.90E+04	-	-
Total PCBs	1.60E+01	6.50E+03	2.80E+04	1.60E+04
Trichloroethene	5.00E+02	2.30E+06	4.40E+02	3.70E+01
Vanadium	5.00E+03	-	-	-
Vinyl chloride	3.40E+01	8.90E+05	1.70E+02	2.80E+00
Xylene (total)	1.50E+02	1.30E+08	6.50E+04	1.50E+02
Zinc	6.30E+05	-	-	-

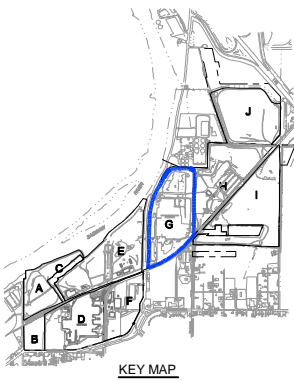
A Michigan Part 201 Industrial and Commercial II Direct Contact Criteria
B Michigan Part 201 Soil Industrial commercial II, III and IV particulate inhalation criteria
C Michigan Part 201 Soil Industrial commercial II, III and IV SV volatilization to ambient air criteria
D Michigan Part 201 Soil Industrial commercial II, III and IV volatilization to indoor air criteria



- LEGEND**
- INVESTIGATIVE UNIT BOUNDARY AND IDENTIFIER
 - MONITORING WELL LOCATION - RFI
 - SOIL BORING LOCATION - RFI
 - SAMPLE LOCATION - NO REPORTED DATA
 - SOIL BORING LOCATION - HISTORICAL

SAMPLE LOCATION	
SB-04634	12/9/02
Total PCBs	0.357 J
SAMPLE DATE	
SB-04634	12/9/02
Total PCBs	0.357 J
SAMPLE DEPTH	
SB-04634	0-2(ft BGS)
Total PCBs	0.357 J
RESULT (mg/kg)	
SB-04634	0.357 J
Total PCBs	0.357 J
PARAMETER	

- NOTES:**
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KEY MAP

SCALE VERIFICATION

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



GENERAL MOTORS CORPORATION
SAGINAW METAL CASTING OPERATIONS

SAGINAW, MICHIGAN

INVESTIGATIVE UNIT G - SOUTH
RFI PHASE 1C - SOIL



CONESTOGA-ROVERS & ASSOCIATES

Source Reference: MICHIGAN STATE PLANE SOUTH, NAD 83 USING INTERNATIONAL FEET, NGVD 86 TOPO - SANBORN, 1996			
Project Manager: I.R.	Reviewed By: M.T.	Date: FEBRUARY 2007	
Scale: 1" = 50'	Project No: 17075-16	Report No: 027	Drawing No: figure 13.2a

