



**CONESTOGA-ROVERS
& ASSOCIATES**

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April 12, 2013

Reference No. 058502

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

Transmitted via E-mail

Dear Mr. Nemani

Re: First Quarter 2013 Progress Report
Performance-Based Administrative Order on Consent
RCRA Corrective Action
Saginaw Nodular Iron, 2100 Veterans Memorial Parkway, Saginaw, MI
USEPA ID No. MID 041 793 340

In accordance with the Performance-Based Administrative Order on Consent (Docket No. RCRA-05-2011-0023) between the U.S. Environmental Protection Agency Region 5 (USEPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for the first quarter of 2013 (January 1, 2013 through March 31, 2013).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

JEP/kf/13

Encl. Attachment A - Fourth Quarter 2012 Progress Report

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

ATTACHMENT A

FIRST QUARTER 2013 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
FORMER SAGINAW NODULAR IRON, SAGINAW, MI
JANUARY 1, 2013 TO MARCH 31, 2013

ATTACHMENT A

WORK PERFORMED THIS QUARTER

The following work was performed during the first quarter at the Nodular facility:

- Contractor completed filling the Primary Settling Basins on January 9, 2013 and is waiting for better weather to complete finish grading and place seed
- Completed SWPPP review and provided to MDEQ on January 10, 2013
- Preparation and submittal of the fourth quarter progress report for 2012 on January 14, 2013
- Submittal of additional copy of the Supplemental RFI at the request of U.S. EPA on January 23, 2013
- Preparation of North Ditch Stabilization alternatives for RACER review
- Preparation of Draft Corrective Measure Proposal and submittal to U.S. EPA on April 1, 2013
- Preparation and submittal of EI CA 750 annual sampling results to U.S. EPA on March 11, 2013
- Periodic inspections for SWPPP and level measurements of secondary pond

DATA AVAILABLE DURING THIS QUARTER

- The annual groundwater data was transmitted to U.S. EPA on March 11, 2013 at part of the EI CA 750 submission.

PROBLEMS ENCOUNTERED

- None

SUMMARY OF PROBLEM RESOLUTION

- None

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

<u>Task</u>	<u>Estimated % Complete</u>
1. IU G - Former Nodular Iron Plant OM&M <ul style="list-style-type: none">• 3-years of EI sampling complete	25%

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<u>Task</u>	<u>Estimated % Complete</u>
<ul style="list-style-type: none"> • 2011 EI sampling and reporting completed April 18, 2012 • 2012 EI sampling and reporting completed March 11, 2013 	
2. IU H - WWTP Closure	40%
<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 • 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 • Bid documents and stabilization work plan for primary settling basins completed • Primary settling basin stabilization work completed with the exception of topsoil and seed. • Developed options for addressing the North Ditch 	
3. IU I- Area Closure	90%
<ul style="list-style-type: none"> • Removed classified sand pile as part of the primary basin stabilization work 	
4. IU I - Staging Area OM&M	0%
5. Other - RCRA Corrective Action Reporting and Other Related Reporting	60%
<ul style="list-style-type: none"> • Submitted CCR documentation to U.S. EPA on November 18, 2011 • Submitted 2011 EI letter to U.S. EPA on April 18, 2012 • Submitted Supplemental RFI Report on September 28, 2012 • Submitted 2012 EI letter to U.S. EPA on March 11, 2013 • Submitted Draft Corrective Measures Proposal to U.S. EPA on April 1, 2013 	

SUMMARY OF CONTACTS WITH INTERESTED PARTIES

- Communication regarding potential sale and future use of property with local community governmental and economic development representatives continues.

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PROJECTED WORK FOR NEXT REPORTING PERIOD

- Finalize CMS/CMP report and submit to U.S. EPA by April 1, 2013
- Complete stabilization of the primary settling basins and related drainage improvements
- Prepare scope of work for submittal to U.S. EPA, and conduct North Ditch Modifications Characterization Study
- Prepare scope of work for submittal to U.S. EPA, and conduct further assessment of groundwater which poses a potential risk to construction workers on and off-Site as identified in the CMP
- Meeting with U.S. EPA to discuss Supplemental RFI Report and Draft CMP
- Begin preparation of Deed Restrictions
- Conduct controlled discharge from secondary pond to lower the secondary pond level
- Continue evaluation of options to address the North Ditch