STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

GORDON E. GUYER, Director

April 28, 1988

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

Dear Mr. Hudson:

SUBJECT: GMC - Saginaw Nodular Iron
Closure Plan Review
MID 041 793 340

We have completed the reviews of your December 23, 1987, closure plans for your old and existing calcium carbide treatment units and container and tank storage areas.

Based on our review, we have determined that the plans are not approvable, and must be revised to meet the closure and post-closure requirements of 1979 Public Act 64. Our review comments are provided in the enclosure to this letter. You should submit the revised closure plans as soon as possible, but not later than May 20, 1988.

Closure of RCRA interim status units does not release the facility from its responsibilities under the Hazardous and Solid Waste Amendments of 1984 (HSWA). All interim status facilities are subject to the corrective action requirements.

If you have any questions, please contact me.

Sincerely,

Andrea R. Scroenrock
Waste Management Division
517-373-3988

cc: Ms. Marilyn Sabadaszka, U.S. EPA
Mr. Rich Traub, U.S. EPA
Mr. Ken Burda/C&E File
Ms. Liz Browne, MDNR
Mr. Jim Sygo, MDNR

001217

Paint Storage Building Drum Storage Area

1. Concrete samples should be at the entrance of the area and at the crack in the concrete. Also samples should be taken from around the outer perimeter of the storage area if unpaved.

2. The closure plan must include a schedule for closure of each hazardous waste management unit and for final closure of the facility. The schedule must include, at a minimum, the total time required to close each hazardous waste management unit and the time required for intervening closure activities which will allow tracking of the progress of partial and final closure.

3. The health and safety plan outline on page 19 appears very thorough, however, the actual plan should be submitted prior to the start of closure activities.

4. The expected analytical detection limits should be included.

5. A statistical comparison for clean-up of potential organic contamination is inappropriate. Solvents are not naturally occurring, and should be removed to non-detectable levels not 1.5 times the background concentration.

6. The EP Toxic list metals should be run as a "total" analysis due to the presence of the pigments and dyes in the specialty lacquers.

7. The closure plan must discuss soil removal procedures to be used if contamination is found. This should also include resampling techniques to verify all contamination has been removed.

8. There is some question on if the designated background areas have been unaffected by plant operations.

Hazardous Waste Control Tank

1. The closure plan must include a schedule for closure of each hazardous waste management unit and for final closure of the facility. The schedule must include, at a minimum, the total time required to close each hazardous waste management unit and the time required for intervening closure activities which will allow tracking of the progress of partial and final closure.

2. The health and safety plan outline on page 20 appears very thorough, the actual plan should be submitted prior to the start of closure activities.

3. The expected analytical detection limits should be included.

4. A statistical comparison for clean-up of potential organic contamination is inappropriate. Solvents are not naturally occurring, and

should be removed to non-detectable levels, not 1.5 times the background concentration.

5. 1,1,1-Trichloroethane breakdown products such as 1,1-Dichloroethane, 1,1 and 1,2-Dichloroethene, Chloroethane and Vinyl Chloride should also be addressed for this closure.

6. What is going to be done with the tank after closure is complete?

7. There is some question on if the designated background areas have been unaffected by plant operations.

Old Calcium Carbide Desulfurization Slag Treatment Unit

1. Soil samples must not be composited.

2. If contamination is found, what is to be done with the contaminated soil or groundwater? Remediation procedures must be included in the closure plan.

3. It is stated that the liquids used for cleaning will be discharged directly on to the ground. The plan also states that hexane, methanol or other organic solvents may be used during decontamination. These solvents should be handled very carefully, containerized, and disposed of in an environmentally safe manner, not on the ground.

4. If contaminated soil removal is necessary, decontamination procedures for equipment used must be outlined, and also steps to ensure trackout will not occur.

5. The health and safety plan outline on page 39 appears very thorough, however, the actual plan should be submitted prior to the start of closure activities.

6. The expected analytical detection limits should be included.

7. Iron, total chromium and total phenols should be included as soil monitoring parameters.

8. There is some question on if the designated background areas have been unaffected by plant operations.

9. Four samples taken 20 feet away from the unit may not adequately identify potential contamination. The effectiveness of the two monitor wells in identifying any groundwater contamination is also questionable.

Calcium Carbide Desulfurization Slag Treatment Bunker-Existing

1. Soil samples must not be composited.

2. If contamination is found, what is to be done with contaminated soil or groundwater? Remediation procedures must be included in the closure plan.

3. It is stated that the liquids used for cleaning will be discharged directly onto the ground. The plan also states that hexane, methanol or other organic solvents may be used during decontamination. These solvents should be handled very carefully, containerized, and disposed of in an environmentally safe manner, not on the ground.

4. If contaminated soil removal is necessary, decontamination procedures for equipment used must be outlined, and also steps to ensure trackout will not occur.

5. The health and safety plan outline on page 41 appears very thorough, however, the actual plan should be submitted prior to the start of closure activities.

6. The expected analytical detection limits should be included.

7. Iron, total chromium and total phenols should be included as soil monitoring parameters.

8. Six samples, taken up to 110 feet away from the bunker may not adequately identify potential contamination. The effectiveness of the two monitor wells in identifying any groundwater contamination is also questionable.

9. There is some question on if the designated background areas have been unaffected by plant operations.