



**CONESTOGA-ROVERS  
& ASSOCIATES**

651 Colby Drive, Waterloo, Ontario, N2V 1C2  
Telephone: (519) 884-0510 Fax: (519) 884-0525  
[www.CRAworld.com](http://www.CRAworld.com)

April 10, 2015

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 2015 Progress Report  
Performance-Based Administrative Order on Consent  
RCRA Corrective Action  
Saginaw Nodular Iron, 2100 Veterans Memorial Parkway, Saginaw, MI  
U.S. EPA ID No. MID 041 793 340

---

In accordance with the Performance-Based Administrative Order on Consent (Docket No. RCRA-05-2011-0023) between the U.S. Environmental Protection Agency Region 5 (U.S. EPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for the first quarter of 2015 (January 1, 2015 through March 31, 2015).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

John-eric Pardys, P.Eng.

JEP/kf/25

Encl. Attachment A – First Quarter 2015 Progress Report

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

# **Attachment A**

**First Quarter 2015 Progress Report  
Performance-Based Administrative Order on Consent  
Former Saginaw Nodular Iron, Saginaw, MI  
January 1, 2015 to March 31, 2015**

## **ATTACHMENT A**

### **Work Performed this Quarter**

The following work was performed during the first quarter of 2015 at the Nodular facility:

- Prepared and submitted the fourth quarter progress report for 2014 on January 5, 2015.
- Submitted Request for Reduction of NPDES monitoring to the MDEQ on January 8, 2015. MDEQ responded to the request in a letter dated January 28, 2015 which modified the NPDES sampling requirements with most of the requested changes but not all.
- Prepared and submitted summary of Waste Management Unit (WMU) status to U.S. EPA on January 22, 2015 and to MDEQ on January 26, 2015.
- Submitted annual EI data letter on February 10, 2015.
- Prepared and submitted joint permit application for proposed work in the North Ditch to MDEQ on February 19, 2015. Received comments from MDEQ on the joint permit on March 17, 2015 and are preparing responses.
- Prepared and submitted work plan to U.S. EPA to conduct additional delineation of manganese and PCB impacts in soil in the south portion of IU G on February 27, 2015. Received approval from U.S. EPA to conduct additional delineation and initiated work.
- Prepared and submitted 2015 Budget Amendment Request No. 1 for additional delineation/characterization work in IU G to U.S. EPA on March 18, 2015.
- Submitted monthly electronic discharge monitoring reports for NPDES permit. There was no discharge during this quarter.
- Completed periodic inspections for SWPPP, completed annual review form, completed revisions to the SWPPP report, and collected level measurements of secondary pond.
- Began preparing evaluation of ammonia concentrations above Groundwater Surface Water Interface Criteria in groundwater in IU G.

### **Data Available During this Quarter**

- Results from additional delineation of PCBs and manganese in IU G (to be submitted under separate cover).

### **Problems Encountered**

- None.

### **Summary of Problem Resolution**

- None.

## Estimated Percent Complete and Information Summary for Selected Activities

<u>Task</u>	<u>Estimated % Complete</u>
<p>1. IU G – FORMER NODULAR IRON PLANT OM&amp;M</p> <p><u>Annual EI Sampling (4-years completed to date by RACER, 2-years completed by MLC, and 3-years completed by GMC)</u> (Estimated percent complete assumes the EI monitoring program is replaced with a Long-term groundwater monitoring program upon approval of the CMP by U.S. EPA by 2016)</p> <ul style="list-style-type: none"> <li>• 2011 EI sampling was completed in November 2011 and reporting was submitted to U.S. EPA April 18, 2012</li> <li>• 2012 EI sampling was completed in November 2012 and reporting was submitted to U.S. EPA March 11, 2013</li> <li>• 2013 EI Sampling was completed in November 2013 and reporting was submitted to U.S. EPA February 13, 2014</li> <li>• 2014 EI sampling was completed in November 2014 and reporting was submitted to U.S. EPA February 10, 2015</li> </ul> <p><u>Additional delineation of PCB and manganese impacts in soil</u></p> <ul style="list-style-type: none"> <li>• Work plan for additional delineation of manganese and PCB impacts in soil in the south portion of IU G submitted to U.S. EPA on February 27, 2015 and approved by U.S. EPA on March 2, 2015</li> <li>• Conduct additional delineation work and prepare summary report <u>Ammonia concentrations above MDEQ Groundwater Surface Water Interface Criteria</u></li> <li>• Review existing groundwater ammonia data and evaluate in general accordance with the MDEQ's document titled, "GSI Pathway Compliance Options"</li> </ul>	70%
<p>2. IU H – WWTP CLOSURE</p> <p><u>Secondary Pond</u></p> <ul style="list-style-type: none"> <li>• Characterization Study on Secondary Pond completed in June of 2011</li> <li>• Emergency overflow for secondary pond installed on March 13, 2012</li> <li>• MDEQ modified NPDES sampling requirements with most of the requested changes in RACER's January 8, 2015 request.</li> <li>• Discharge of water under NPDES permit to maintain freeboard in the secondary pond until October 2016 when the NPDES permit expires. Prior to permit termination, RACER will evaluate and provide a proposal to U.S. EPA and MDEQ regarding the need for further sampling or other action.</li> </ul>	75%

<u>Task</u>	<u>Estimated % Complete</u>
<u>Primary Basins</u> <ul style="list-style-type: none"> <li>• Work plan for stabilizing primary settling basins submitted to U.S. EPA on July 31, 2012 and Work Plan approved by U.S. EPA on September 18, 2012</li> <li>• Primary settling basin stabilization work was completed June 20, 2013. A construction completion report was submitted to U.S. EPA on September 4, 2013</li> </ul>	100%
<u>North Ditch</u> <ul style="list-style-type: none"> <li>• Sampling and Analysis Plan for the North Ditch submitted to U.S. EPA on April 26, 2013 and was approved by U.S. EPA on July 8, 2013</li> <li>• North Ditch Investigation and additional monitoring completed the week of July 15, 2013. The results of the investigation were submitted to U.S. EPA on October 23, 2013</li> <li>• Stabilization Alternative Evaluation and Recommendation for the North Ditch was submitted to U.S. EPA on February 26, 2014</li> <li>• Obtain necessary permits to perform work <ul style="list-style-type: none"> <li>- Joint permit application was prepared and submitted to MDEQ on February 19, 2015</li> <li>- Other permits needed include: City floodplain permit and County of Saginaw soil erosion and sedimentation control permit</li> </ul> </li> <li>• Implement approved plan</li> </ul>	45%
3. IU I- AREA CLOSURE	
<u>Classified Sand Pile</u> <ul style="list-style-type: none"> <li>• Removed all classified sand pile as part of the primary basin stabilization work</li> </ul>	100%
4. IU I – STAGING AREA OM&M	NA
<ul style="list-style-type: none"> <li>• No activities proposed or pending at this time</li> </ul>	
5. OTHER – RCRA CORRECTIVE ACTION REPORTING AND OTHER RELATED REPORTING	
<u>Budget Process</u> <ul style="list-style-type: none"> <li>• U.S. EPA approved the 2012 EA Budget Authorization Request on December 22, 2011</li> <li>• U.S. EPA approved the 2012 Annual EA Budget Amendment No. 1 on September 19, 2012</li> <li>• U.S. EPA approved the 2013 EA Budget Authorization Request on January 3, 2013</li> </ul>	On-going

<b><u>Task</u></b>	<b><u>Estimated % Complete</u></b>
<ul style="list-style-type: none"> <li>• U.S. EPA approved the 2014 EA Budget Authorization Request on November 22, 2013</li> <li>• U.S. EPA approved the 2014 EA Budget Authorization Request on November 20, 2014</li> <li>• U.S. EPA approved the 2015 Annual EA Budget Amendment No. 1 on March 20, 2015</li> </ul>	
<b><u>RCRA Corrective Action Reporting</u></b>	<b>60%</b>
<ul style="list-style-type: none"> <li>• Submitted CCR documentation to U.S. EPA on November 18, 2011</li> <li>• Submitted Supplemental RFI Report on September 28, 2012</li> <li>• Submitted Draft Corrective Measures Proposal to U.S. EPA on April 1, 2013</li> <li>• Submitted Summary of WMU status to U.S. EPA on January 22, 2015 and to MDEQ on January 26, 2015</li> <li>• Prepare response to comments from U.S. EPA on the Supplemental RFI and CMP – To be determined (TBD)</li> <li>• Prepare Declaration of Restrictive Covenant - TBD</li> <li>• Prepare Corrective Measures Implementation Plan - TBD</li> <li>• Prepare Final Remedy Construction Completion Report - TBD</li> </ul>	
<b><u>Other Related Reporting</u></b>	
<ul style="list-style-type: none"> <li>• DEQ issued NPDES permit for the Site on August 24, 2012</li> <li>• Submit monthly DMRs</li> </ul>	<p>100%</p> <p>On-going</p>

### **Summary of Contacts with Interested Parties**

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

### **Projected Work for Next Reporting Period**

- Prepare and submit responses to MDEQ comments on the Joint Permit for the work proposed in the North Ditch. Prepare and submit City of Saginaw floodplain permit application.
- Prepare bid package for work proposed in the North Ditch.
- Complete additional delineation of PCB and manganese impacts in soil in IU G and prepare summary report.
- Finalize and submit evaluation of groundwater ammonia GSI exceedances
- Prepare responses to or meet with U.S. EPA to discuss any comments on the Supplemental RFI Report and Draft CMP.

- Prepare responses to or meet with U.S. EPA and MDEQ to discuss any comments on the status of former regulated WMUs.
- Complete periodic inspections per the SWPPP and level measurements of secondary pond.
- Perform discharge event from secondary pond, if necessary, and complete any necessary monitoring required by the NPDES permit for Outfalls 021A (secondary pond) and 022A (North Ditch).