

# Memorandum

### May 29, 2017

To:	Dave Favero (RACER)	Ref. No.:	007878
	J.E.P.		
From:	John-eric Pardys/ev/167		
	<b>O</b> , <b>H</b>		
CC:	Steve Hoevemeyer		
Subject:	Condition of Sand Used to Construct Buffer Basin		

The following memorandum has been prepared at the request of RACER to document the condition of the sand used to construct the former buffer basin berms at RACER's Saginaw Malleable Industrial Land (Site) in Saginaw, Michigan. Some of this sand was used during the demolition of the Plant as fill and a portion of the berm remains at the Site, as shown on Figure 1.

The buffer basin was a component of the Recycle Water Treatment Facility (RWTF) that was constructed in 1996. The RWTF was a closed loop mechanically operated system that replaced the Former Water Recirculation System (WRS), which involved the use of a series of settling ponds for treatment of process water from various processes in the plant. The RWTF treatment process consisted of continuous flocculation, sedimentation, and filtration of approximately 6.5 to 7.5 million gallons of process water per day (5 to 6 days per week) while it operated. Treated water was either directed back to the Plant for use as non-contact cooling water, stored in the buffer basin (which had a capacity of 11 million gallons), or blown down to the City of Saginaw POTW, as needed (permitted to discharge 450,000 gallons per day). If the Plant needed additional water, water was pumped to the buffer basin from the secondary pond. Figure 1 presents a Site Plan identifying the RWTF and buffer basin locations.

The berms of the buffer basin were constructed of virgin sand with an HDPE liner placed over top.

The RWTF (including the buffer basin), was decommissioned along with the Plant between 2007 and 2010. As part of decommissioning activities, a sample of the buffer basin sediment was collected and analyzed for PCBs, TCLP Metals, TCLP VOCs, and TCLP SVOCs. The results of the buffer basin sediment sample were non-detect for PCBs, TCLP VOCs, and TCLP SVOCs and the TCLP metal concentrations were below the disposal limits. A copy of the results are provided in Attachment A. As a result, the sediments from the buffer basin remained on-Site and were used as grading material around the buffer basin area.

To date, the sand used in the construction of the buffer basin berms has not been characterized. However, given that the material used to construct the buffer basin was virgin material, the buffer basin was used to hold treated water, the sediments in the buffer basin were either non-detect or below disposal limits, and there was an HDPE liner between the treated water and the sands used to construct the buffer basin, GHD expects the sand used to construct the buffer basin to be unimpacted.

### **Enclosures:** Figure 1 – Site Plan

Attachment A – Analytical Results for Sediments in Buffer Basin





07878-T02(MEMO167)GN-WA001 MAY 29, 2017



GHD | 007878Memo167-TPs



Report ID: S45537.01(02) Generated on 09/09/2010 Replaces report S45537.01(01) generated on 09/09/2010

Report to

Attention: Kim Dohn O'Brien & Gere Engineers 37000 Grand River Ave. Suite 260 Farmington, MI 48335

Phone: 989-714-8813 FAX: 248-477-5962 Email: dohnka@obg.com

**Report Summary** 

Lab Sample ID(s): S45537.01-S45537.02 Project: MLC Saginaw Collected Date: 09/01/2010 Submitted Date/Time: 09/01/2010 15:00 Sampled by: Kim Dohn P.O. #: 10910970

Report Notes

Results relate only to items tested as received by the laboratory.

Methods may be modified for improved performance.

Results reported on a dry weight basis where applicable.

"Not detected" indicates that parameter was not found at a level equal to or greater than the RL. Report shall not be reproduced except in full, without the written approval of Merit Laboratories.

Laboratory Certifications:

Michigan DNRE (#9956), Ohio EPA (#CL0002), NELAC NY (#11814), NELAC FL (#E871045), WBENC (#2005110032) Some analytes reported may not be certified. Full certification lists are available upon request.

Violetta F. Murshah

Violetta F. Murshak Laboratory Director

Report produced by

Merit Laboratories 2680 East Lansing Drive East Lansing, MI 48823

Phone: (517) 332-0167 FAX: (517) 332-6333



Sample Summary (2 samples)						
Sample ID	Sample Tag	Matrix	Collected Date/Time			
S45537.01	100901 Storm Pond	Liquid	09/01/2010 10:00			
S45537.02	100901 Buffer Basin	Solid	09/01/2010 10:30			



### Lab Sample ID: S45537.01 Sample Tag: 100901 Storm Pond Collected Date/Time: 09/01/2010 10:00 Matrix: Liquid COC Reference: 56865

#### Sample Containers

#	Туре	Preservative(s)		Refrigerated?	Arrival Tem	p. (C)	Thermomete	er #		
1	1L Amber	None		Yes	4.7		IR			
Ana	alysis		Results	Units	RL	Method	R	Run Date/Time	Analyst Limits Fla	ags
Ext	traction / Prep.									
Ext	raction, PCB		Completed			3510C	0	9/01/10 18:58	ADB	
Org	ganics - PCBs/Pesticides									
РС	В									
PC	B-1016		Not detected	ug/L	0.1	608	0	9/02/10 20:29	JANB	
PC	B-1221		Not detected	ug/L	0.1	608	0	9/02/10 20:29	JANB	
PC	B-1232		Not detected	ug/L	0.1	608	0	9/02/10 20:29	JANB	
PC	B-1242		Not detected	ug/L	0.1	608	0	9/02/10 20:29	JANB	
PC	B-1248		Not detected	ug/L	0.1	608	0	9/02/10 20:29	JANB	
PC	B-1254		Not detected	ug/L	0.1	608	0	9/02/10 20:29	JANB	
PC	B-1260		Not detected	ug/L	0.1	608	0	9/02/10 20:29	JANB	
PC	B, Total		Not detected	ug/L	0.1	608	0	9/02/10 20:29	JANB	



### Lab Sample ID: S45537.02 Sample Tag: 100901 Buffer Basin Collected Date/Time: 09/01/2010 10:30 Matrix: Solid COC Reference: 56865

#### Sample Containers

#	Туре	Preservative(s)		Refrigerated?	Arrival Te	тр. (C)	Thermometer #			
1	32oz Glass	None		Yes	4.7		IR			
Ana	lysis	R	esults	Units	RL	Method	Run Date	/Time Anal	yst Limits Fla	ags
Ext	raction / Prep.									
Extr	action, PCB	C	ompleted			3550B	09/02/10	15:02 ADB	•	
Mer	cury Digestion	C	ompleted			7471A	09/07/10	08:30 JRT		
Met	al Digestion	C	ompleted			3015A	09/07/10	12:00 PER		
TCL	P Zero Headspace Ext.	С	ompleted			1311	09/02/10	16:00 WAF	२	
TCL	P/SPLP BNA Extraction	C	ompleted			3510C	09/08/10	00:27 EMR	K	
тсі	P Extraction									
Inita	al Sample pH	N	/A			1311	09/02/10	17:00 WAF	२	
pH a	after 3.5 ml HCl	N	/A			1311	09/02/10	17:00 WAF	२	
% S	Solids	1	00			1311	09/02/10	17:00 WAF	२	
San	nple Used g	1	00			1311	09/02/10	17:00 WAF	२	
Fina	al Volume mL	2	,000			1311	09/02/10	17:00 WAF	२	
TCL	P Extraction Fluid	1				1311	09/02/10	17:00 WAF	२	
Fina	al Extract pH	4	.93			1311	09/02/10	17:00 WAF	र	
Ino	rganics									
Tota	al Solids	8	9	%	1	Std M 25	540 B 09/02/10	11:00 DJS		
Met	tals									
Arse	enic, TCLP	N	ot detected	mg/L	0.02	6020	09/07/10	15:31 PER	5.0	
Bari	ium, TCLP	0	.15	mg/L	0.05	6020	09/07/10	15:31 PER	100.0	
Cad	lmium, TCLP	0	.184	mg/L	0.005	6020	09/07/10	15:31 PER	1.0	
Chr	omium, TCLP	Ν	ot detected	mg/L	0.05	6020	09/07/10	15:31 PER	5.0	
Lea	d, TCLP	0	.38	mg/L	0.03	6020	09/07/10	15:31 PER	5.0	
Mer	cury, TCLP	Ν	ot detected	mg/L	0.0002	7471A	09/07/10	14:04 JRT	0.2	
Sele	enium, TCLP	Ν	ot detected	mg/L	0.05	6020	09/07/10	15:31 PER	1.0	
Silv	er, TCLP	Ν	ot detected	mg/L	0.005	6020	09/07/10	15:31 PER	5.0	
Org	anics - PCBs/Pesticides									
PCE	3 List									
PCE	3-1016	N	ot detected	ug/kg	330	8082	09/06/10	23:29 JAN	В	
PCE	3-1242	N	ot detected	ug/kg	330	8082	09/06/10	23:29 JAN	В	
PCE	3-1221	N	ot detected	ug/kg	330	8082	09/06/10	23:29 JAN	В	
PCE	3-1232	N	ot detected	ug/kg	330	8082	09/06/10	23:29 JAN	В	
PCE	3-1248	N	ot detected	ug/kg	330	8082	09/06/10	23:29 JAN	В	
PCE	3-1254	N	ot detected	ug/kg	330	8082	09/06/10	23:29 JAN	В	
PCE	3-1260	Ν	ot detected	ug/kg	330	8082	09/06/10	23:29 JAN	В	
Org	anics - Semi-Volatiles									
TCL	P Semi Volatiles									
o-C	resol	N	ot detected	ug/L	1,000	8270C	09/09/10	00:14 PL	200,000	
p,m	-Cresol	Ν	ot detected	ug/L	1,000	8270C	09/09/10	00:14 PL	200,000	
Pen	tachlorophenol	Ν	ot detected	ug/L	1,000	8270C	09/09/10	00:14 PL	100,000	



### Lab Sample ID: S45537.02 (continued) Sample Tag: 100901 Buffer Basin

Analysis	Results	Units	RL	Method	Run Date/Time	Analy	st Limits	Flags
Organics - Semi-Volatiles (continued)								
TCLP Semi Volatiles (continued)								
2,4,5-Trichlorophenol	Not detected	ug/L	1,000	8270C	09/09/10 00:14	PL	400,000	
2,4,6-Trichlorophenol	Not detected	ug/L	1,000	8270C	09/09/10 00:14	PL	2,000	
2,4-Dinitrotoluene	Not detected	ug/L	90	8270C	09/09/10 00:14	PL	130	
Hexachlorobenzene	Not detected	ug/L	90	8270C	09/09/10 00:14	PL	130	
Hexachlorobutadiene	Not detected	ug/L	100	8270C	09/09/10 00:14	PL	500	
Hexachloroethane	Not detected	ug/L	100	8270C	09/09/10 00:14	PL	3,000	
Nitrobenzene	Not detected	ug/L	100	8270C	09/09/10 00:14	PL	2,000	
Pyridine	Not detected	ug/L	100	8270C	09/09/10 00:14	PL	5,000	
Organics - Volatiles								
TCLP Volatiles								
Benzene	Not detected	ug/L	100	8260B	09/08/10 06:54	JGH	500	
Carbon tetrachloride	Not detected	ug/L	100	8260B	09/08/10 06:54	JGH	500	
Chlorobenzene	Not detected	ug/L	100	8260B	09/08/10 06:54	JGH	100,000	
Chloroform	Not detected	ug/L	100	8260B	09/08/10 06:54	JGH	6,000	
1,4-Dichlorobenzene	Not detected	ug/L	100	8260B	09/08/10 06:54	JGH	7,500	
1,2-Dichloroethane	Not detected	ug/L	100	8260B	09/08/10 06:54	JGH	500	
1,1-Dichloroethene	Not detected	ug/L	100	8260B	09/08/10 06:54	JGH	700	
2-Butanone (MEK)	Not detected	ug/L	1,000	8260B	09/08/10 06:54	JGH	200,000	
Tetrachloroethene	Not detected	ug/L	100	8260B	09/08/10 06:54	JGH	700	
Trichloroethene	Not detected	ug/L	100	8260B	09/08/10 06:54	JGH	500	
Vinyl chloride	Not detected	ug/L	100	8260B	09/08/10 06:54	JGH	200	

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