



September 14, 2012

Ms. Kimberly Mason
Director of Water and Sewer Services
City of Saginaw
2406 Veterans Memorial Parkway
Saginaw, Michigan 48601

Dear Ms. Mason:

Re: Consent Order Quarterly and SIU Permit Semi-Annual Monitoring at
Outfalls CFD-01 and CFD-02 for August 2012
GMPT Saginaw Malleable Iron (SMI), Saginaw, Michigan

The City of Saginaw Significant Industrial User (SIU) Discharge Permit #09-517 (Permit) requires RACER to submit quarterly reports containing applicable monitoring data.

This letter presents the requested sampling results as we discussed including the quarterly/semi-annual monitoring analytical results for 24-hour time proportional composite samples collected from Outfalls CFD-01 and CFD-02. The analytical results represent sampling for the first two quarters of 2012 and are representative of normal daily discharges. 24-hour time proportional composite samples were collected on the 27th, 28th, 29th and 30th of August, 2012. Samples were analyzed in accordance with the Permit requirements including 40 CFR Part 136. Sample results are summarized in Table 1 and the laboratory reports are presented in Attachment A. The laboratory has an active quality control and quality assurance (QC/QA) program in place to ensure reliable and accurate data.

There have been no changes in facility activity, production, or discharge practices. The facility is currently a vacant property. The sewers at the facility were abandoned in 2011 and no current operational discharges to the system are occurring. Beyond that, there have been no changes not previously reported. Materials, if any, which could cause slug loading or detrimental affect on the sewer system are stored in a manner to minimize any possible discharge to the sewer system.

The following summarizes the PCB analytical results (analyzed in accordance with EPA Method 608):

<i>Date</i>	<i>Sample Time</i>	<i>CFD-01 (µg/L) (Sample Tag 01)</i>	<i>CFD-02 (µg/L) (Sample Tag 02)</i>	<i>Flow (gpd)</i>
August 27	11:25, 11:00	<0.1	<0.1	0***
August 27	11:15, 11:00	<0.1	<0.1	0***
August 29	11:15, 11:00	<0.1	<0.1	0***
August 30	City Split	<0.1	<0.1	0***

Note:

*** Flow at CFD-02 was too low to obtain an accurate reading, therefore, average and maximum daily flows are not available, however, the only discharge is incidental groundwater and stormwater infiltration.

Table 1 presents a summary of the sample results. All samples at CFD-02 are in compliance or deemed to be in compliance.

RACER is continuing to work with the City to terminate the discharge permit as all connections have been discontinued and there is currently no activity at the property resulting in any discharges to any sewers.

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. I am aware that there are significant penalties for submitting false information, including possibility of fine and imprisonment for knowing violations.

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If you have any questions or require clarification on the above information please feel free to contact me at 313-486-2908.

Yours truly,



Grant Trigger
RACER

Encl.

cc: Jeanette Best - City of Saginaw
Jason Casteel - City of Saginaw
Dave Favero - RACER
Michael Tomka - CRA