



**CONESTOGA-ROVERS
& ASSOCIATES**

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

January 5, 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: Fourth Quarter 2014 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 fourth quarter of 2014 (October 1, 2014 through December 31, 2014).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

JEP/kf/22

Encl. Attachment A – Fourth Quarter 2014 Progress Report

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

Attachment A

**Fourth Quarter 2014 Progress Report
Performance-Based Administrative Order on Consent
Former Saginaw Nodular Iron, Saginaw, MI
October 1, 2014 to December 31, 2014**

ATTACHMENT A

Work Performed this Quarter

The following work was performed during the fourth quarter of 2014 at the Nodular facility:

- Participated in pre-application (for MDEQ/US Army Corps joint permit) meeting at the Site with the MDEQ for proposed work on the North Ditch on October 1, 2014.
- Prepared and submitted the third quarter progress report for 2014 on October 7, 2014.
- Obtained concurrence from US Army Corps on October 27, 2014 that a separate authorization from the Corps is not required for the proposed North Ditch work.
- Conducted annual EI sampling event the week of November 10, 2014.
- Prepared and submitted final 2015 budget request to U.S. EPA on November 12, 2014.
- Submitted monthly electronic discharge monitoring reports for NPDES permit. There was one discharge event from Outfall 022A (North Ditch) during this reporting period. There were no exceedances of discharge limits.
- Completed periodic inspections for SWPPP and level measurements of secondary pond.
- Continued evaluation and preparation of a summary of Waste Management Unit (WMU) status.
- Prepared joint permit application for proposed work in the North Ditch.
- Corresponded with MDEQ to discuss options for eliminating or reducing sampling requirements from Outfall 022A (North Ditch) following completion of the proposed work.

Data Available During this Quarter

- NPDES discharge sampling data was posted by December 20, 2014 for the discharges in November 2014. A copy of the electronic discharge monitoring reports is provided in Attachment A.1.
- Annual EI monitoring results (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&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"> • 2011 EI sampling was completed in November 2011 and reporting was submitted to U.S. EPA April 18, 2012 • 2012 EI sampling was completed in November 2012 and reporting was submitted to U.S. EPA March 11, 2013 • 2013 EI Sampling was completed in November 2013 and reporting was submitted to U.S. EPA February 13, 2014 • 2014 EI sampling was completed in November 2014 and the results will be submitted in the first quarter of 2015 	70%
<p>2. IU H – WWTP CLOSURE</p> <p><u>Secondary Pond</u></p> <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 • 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. 	70%
<p><u>Primary Basins</u></p> <ul style="list-style-type: none"> • 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 • Primary settling basin stabilization work was completed June 20, 2013. A construction completion report was submitted to U.S. EPA on September 4, 2013 	100%

<u>Task</u>	<u>Estimated % Complete</u>
<u>North Ditch</u> <ul style="list-style-type: none"> • 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 • 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 • Stabilization Alternative Evaluation and Recommendation for the North Ditch was submitted to U.S. EPA on February 26, 2014 • Obtain necessary permits to perform work • Implement approved plan 	40%
3. IU I- AREA CLOSURE <u>Classified Sand Pile</u>	100%
<ul style="list-style-type: none"> • Removed all classified sand pile as part of the primary basin stabilization work 	
4. IU I – STAGING AREA OM&M <ul style="list-style-type: none"> • No activities are proposed at this time 	NA
5. OTHER – RCRA CORRECTIVE ACTION REPORTING AND OTHER RELATED REPORTING <u>Budget Process</u>	On-going
<ul style="list-style-type: none"> • U.S. EPA approved the 2012 EA Budget Authorization Request on December 22, 2011 • U.S. EPA approved the 2012 Annual EA Budget Amendment No. 1 on September 19, 2012 • U.S. EPA approved the 2013 EA Budget Authorization Request on January 3, 2013 • U.S. EPA approved the 2014 EA Budget Authorization Request on November 22, 2013 • U.S. EPA approved the 2014 EA Budget Authorization Request on November 20, 2014 	

<u>Task</u>	<u>Estimated % Complete</u>
<u>RCRA Corrective Action Reporting</u>	
<ul style="list-style-type: none"> • Submitted CCR documentation to U.S. EPA on November 18, 2011 • Submitted Supplemental RFI Report on September 28, 2012 • Submitted Draft Corrective Measures Proposal to U.S. EPA on April 1, 2013 • Prepare response to comments from U.S. EPA on the Supplemental RFI and CMP • Prepare Declaration of Restrictive Covenant • Prepare Corrective Measures Implementation Plan • Prepare Final Remedy Construction Completion Report 	60%
<u>Other Related Reporting</u>	
<ul style="list-style-type: none"> • DEQ issued NPDES permit for the Site on August 24, 2012 • Submit monthly DMRs 	100% On-going

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

- Submit joint permit to the MDEQ for the work proposed in the North Ditch
- Prepare bid package for work proposed in the North Ditch.
- Submit request to MDEQ to reduce frequency of monitoring from Outfalls 021A and 022A from daily during discharge to weekly during discharge.
- Submit 2014 EI sample results.
- Meet with U.S. EPA to discuss and/or prepare responses to any U.S. EPA comments on the Supplemental RFI Report and Draft CMP.
- Evaluate status of former regulated units and coordinate approach for final resolution with U. S. EPA and MDEQ.
- Complete periodic inspections per the SWPPP and level measurements of secondary pond.
- Perform discharge event from secondary pond if necessary.

Enclosed:

Attachment A.1 – NPDES Permitted Discharge Summary Data – November 2014

Attachment A.1

November 2014

NPDES Permitted Discharge Summary Data

Michigan Department of Environmental Quality Monthly Discharge Monitoring Report (DMR)

PERMITTEE NAME: RACER-Saginaw Nodular Indust
MAILING ADDRESS: 2100 Veterans Memorial Parkway
 Saginaw, MI 48601
FACILITY: RACER-Saginaw Nodular Indust
LOCATION: 2100 Veterans Memorial Parkway
 Saginaw, MI 48601

PERMIT NUMBER: MI0059042
MONITORING POINT: 021A

DISTRICT: Saginaw Bay
COUNTY: Saginaw

Monitoring Period : 2014-11-01 To: 2014-11-30

NO DISCHARGE FROM SITE: (X)

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
		Average	Maximum		Minimum	Average	Maximum				
Flow PARAM CODE: 50050 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****		*****	*****	*****		0	*****	*****
	Permit Requirement	(report) Maximum Monthly Average	(report) Maximum Daily	MGD	*****	*****	*****	*****		Daily when Discharging	Recorded Daily Flow
Total Suspended Solids PARAM CODE: 00530 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****		*****	*****	*****		0	*****	*****
	Permit Requirement	*****	*****	*****	*****	35 Maximum Monthly Average	70 Maximum Daily	mg/l		See Permit Requirements	3-Portion Composite
Carbonaceous Biochemical Oxygen Demand (CBOD5) PARAM CODE: 80082 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****		0	*****	*****
	Permit Requirement	*****	*****	*****	*****	*****	13 Maximum Daily	mg/l		Daily when Discharging	Grab
Ammonia Nitrogen (as N) PARAM CODE: 00610 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****		0	*****	*****
	Permit Requirement	*****	*****	*****	*****	*****	5.8 Maximum Daily	mg/l		Daily when Discharging	Grab
Outfall Observation PARAM CODE: 84130 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	yes/no	*****	*****	*****		0	*****	*****
	Permit Requirement	(report) Yes/No	*****		*****	*****	*****	*****		Daily when Discharging	Visual
pH PARAM CODE: 00400 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****		0	*****	*****
	Permit Requirement	*****	*****	*****	6.5 Minimum Daily	*****	9.0 Maximum Daily	S.U.		Daily when Discharging	Grab
Dissolved Oxygen PARAM CODE: 00300 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****		0	*****	*****
	Permit Requirement	*****	*****	*****	6.0 Minimum Daily	*****	*****	mg/l		Daily when Discharging	Grab
Name/Title of Principal Executive Officer Or Authorized Agent	certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.					Signature of Principal Executive Officer Or Authorized Agent		Telephone No	Date (MM/DD/YY)		
David Favero, Deputy Cleanup Manager for Michigan						David Favero		313-486-2908	2014-12-15		

When completed mail this report to: PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Non-Numeric Code Legend (for monthly data entry purpose)	
*A	Sampling Equipment Failure
*B	Insufficient Flow for Sampling
*C	Laboratory Problem/Error
*D	Laboratory Results Not Received in Time for Report
*E	This Effluent Limit Not Applicable this Reporting Period
*F	No Operations this Reporting Period
*G	Monitoring is a Permit Condition/Not Required this Reporting Period
*Y	Fecal Coliform (too numerous to count)
*T	Alternative to TTO Monitoring

Stage Code Legend	
1	Final Effluent

Michigan Department of Environmental Quality Daily Discharge Monitoring Report (DMR)

PERMITTEE NAME: RACER-Saginaw Nodular Indust
MAILING ADDRESS: 2100 Veterans Memorial Parkway
 Saginaw, MI 48601
FACILITY: RACER-Saginaw Nodular Indust
LOCATION: 2100 Veterans Memorial Parkway
 Saginaw, MI 48601

PERMIT NUMBER: **MI0059042**
DISTRICT: Saginaw Bay
COUNTY: Saginaw
MONITORING POINT: 021A
MONITORING PERIOD : **2014-11-01**To: **2014-11-30**

PARAMETER NAME	Flow	Total Suspended Solids	Carbonaceous Biochemical Oxygen Demand (CBOD5)	Ammonia Nitrogen (as N)	Outfall Observation	pH	Dissolved Oxygen
PARAMETER CODE	50050	00530	80082	00610	84130	00400	00300
MONITORING PT.	021A	021A	021A	021A	021A	021A	021A
STAGE CODE	1	1	1	1	1	1	1
UNIT	MGD	mg/l	mg/l	mg/l	yes/no	S.U.	mg/l
2014-11-01							
2014-11-02							
2014-11-03							
2014-11-04							
2014-11-05							
2014-11-06							
2014-11-07							
2014-11-08							
2014-11-09							
2014-11-10							
2014-11-11							
2014-11-12							
2014-11-13							
2014-11-14							
2014-11-15							
2014-11-16							
2014-11-17							
2014-11-18							
2014-11-19							
2014-11-20							
2014-11-21							
2014-11-22							
2014-11-23							
2014-11-24							
2014-11-25							
2014-11-26							
2014-11-27							
2014-11-28							
2014-11-29							
2014-11-30							
Name/Title of Principal Executive Officer Or Authorized Agent	I certify under penalty of law that I have personally examined and am familiar with the information submitted herein, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.				Signature of Principal Executive Officer Or Authorized Agent	Telephone No	Date (MM/DD/YY)
David Favero, Deputy Cleanup Manager for Michigan					David Favero	313-486-2908	2014-12-15

When completed mail this report to: PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 1

Michigan Department of Environmental Quality Daily Discharge Monitoring Report (DMR)

PERMITTEE NAME: RACER-Saginaw Nodular Indust
MAILING ADDRESS: 2100 Veterans Memorial Parkway
 Saginaw, MI 48601
FACILITY: RACER-Saginaw Nodular Indust
LOCATION: 2100 Veterans Memorial Parkway
 Saginaw, MI 48601

PERMIT NUMBER: **MI0059042**
DISTRICT: Saginaw Bay
COUNTY: Saginaw
MONITORING POINT: 021A
MONITORING PERIOD : **2014-11-01**To: **2014-11-30**

PARAMETER NAME	Turbidity				
PARAMETER CODE	00070				
MONITORING PT.	021A				
STAGE CODE	1				
UNIT	nephelometric turbidity unit				
2014-11-01					
2014-11-02					
2014-11-03					
2014-11-04					
2014-11-05					
2014-11-06					
2014-11-07					
2014-11-08					
2014-11-09					
2014-11-10					
2014-11-11					
2014-11-12					
2014-11-13					
2014-11-14					
2014-11-15					
2014-11-16					
2014-11-17					
2014-11-18					
2014-11-19					
2014-11-20					
2014-11-21					
2014-11-22					
2014-11-23					
2014-11-24					
2014-11-25					
2014-11-26					
2014-11-27					
2014-11-28					
2014-11-29					
2014-11-30					
Name/Title of Principal Executive Officer Or Authorized Agent	I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	Signature of Principal Executive Officer Or Authorized Agent	Telephone No	Date (MM/DD/YY)	
David Favero, Deputy Cleanup Manager for Michigan		David Favero	313-486-2908	2014-12-15	

When completed mail this report to: PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 2

Michigan Department of Environmental Quality Daily Discharge Monitoring Report (DMR)

PERMITTEE NAME: RACER-Saginaw Nodular Indust	PERMIT NUMBER: MI0059042
MAILING ADDRESS: 2100 Veterans Memorial Parkway Saginaw, MI 48601	DISTRICT: Saginaw Bay
FACILITY: RACER-Saginaw Nodular Indust	COUNTY: Saginaw
LOCATION: 2100 Veterans Memorial Parkway Saginaw, MI 48601	MONITORING POINT: 022A
	MONITORING PERIOD : 2014-11-01 To: 2014-11-30

PARAMETER NAME	Flow	Total Suspended Solids	pH	Turbidity			
PARAMETER CODE	50050	00530	00400	00070			
MONITORING PT.	022A	022A	022A	022A			
STAGE CODE	1	1	1	1			
UNIT	MGD	mg/l	S.U.	nephelometric turbidity unit			
2014-11-01							
2014-11-02							
2014-11-03							
2014-11-04							
2014-11-05							
2014-11-06							
2014-11-07							
2014-11-08							
2014-11-09							
2014-11-10							
2014-11-11							
2014-11-12							
2014-11-13							
2014-11-14							
2014-11-15							
2014-11-16							
2014-11-17							
2014-11-18							
2014-11-19							
2014-11-20							
2014-11-21							
2014-11-22							
2014-11-23							
2014-11-24							
2014-11-25	0.0024	< 4.0	7.7				
2014-11-26							
2014-11-27							
2014-11-28							
2014-11-29							
2014-11-30							
Name/Title of Principal Executive Officer Or Authorized Agent	I certify under penalty of law that I have personally examined and am familiar with the information submitted herein, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			Signature of Principal Executive Officer Or Authorized Agent	Telephone No	Date (MM/DD/YY)	
David Favero, Deputy Cleanup Manager for Michigan				David Favero	313-486-2908	2014-12-15	

When completed mail this report to: PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 3

PARAMETER COMMENTS:

Monitoring Point	Parameter Name	Parameter Code	Date	Stage	Unit	Comment
------------------	----------------	----------------	------	-------	------	---------

Non-Numeric Code Legend (for daily data entry purpose)	
*Y	Fecal Coliform (too numerous to count)

Stage Code Legend	
1	Final Effluent