



**Revitalizing Auto Communities
Environmental Response Trust**

May 8, 2012

Mr. Jason Casteel
City of Saginaw Waste Water Treatment Division
Environmental Compliance
2406 Veterans Memorial Parkway
Saginaw, Michigan 48601

Re: Consent Order and Request to Terminate Permit
GMPT Saginaw Malleable Iron (SMI), Saginaw, Michigan

Dear Mr. Casteel:

We have reviewed your communications with Mike Tomka from CRA and have discussed with Mike a recent field assessment that was performed to evaluate the effectiveness of the bulkheading that was performed last year. Based on the field investigations, CRA's observations and the photographic evidence RACER Trust has terminated all discharges to the City of Saginaw sewer system and the bulkheading that was installed is performing as expected.

Your letter of September 29, 2011 submitted to Mr. Tomka (copy attached) indicates that the permit will be terminated upon abandonment of the 24-inch and 42-inch sewers. Per our letter (copy attached) dated November 18, 2011, we have documented the appropriate abandonment of the 2 locations. Therefore, we requested that the permit be terminated. With respect to observed flow at CFD-01 and CFD-02, Mr. Tomka has advised us that the sewer is below the water table and likely subject to infiltration at joints which is not uncommon with sewers. RACER Trust's elimination of the discharges to the City's sewer system has made any permit inapplicable. We respectfully request that you take the appropriate action to reflect these facts.

We have previously made a formal request for termination of the permit (November 11, 2011). We are hereby giving you notice that we no longer intend to perform any permit related activities because all the work that is necessary to terminate any permit related requirements has been completed and submitted to you.

In addition, we are returning herewith a copy of an invoice that was submitted to us for services apparently associated with the previous Consent Order between the City of Saginaw and

2930 Ecorse Road • Ypsilanti, Michigan 48198 • 313.486.2908

May 8, 2012

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General Motors. As a result of its bankruptcy, all contractual obligations of General Motors including local Consent Orders or other similar contractual arrangements that were not otherwise expressly adopted by, accepted by, or transferred to RACER Trust were terminated by the bankruptcy. While RACER Trust is successor in title to the Saginaw Malleable Iron Site, RACER is not a party to or subject to the Consent Order between General Motors and the City of Saginaw, insofar as the Consent Order was not adopted by, accepted by, or transferred to RACER Trust in the bankruptcy proceeding.

If you have any questions with respect to our position on the permit or the fact that the Consent Order is not applicable to RACER Trust please call me at 313-670-6226 or contact our legal counsel, Mr. Carl Garvey, at the following phone number, 202-664-3056.

Sincerely,



Grant R. Trigger
Michigan Cleanup Manager

Encl.

cc: Jeanette Best - City of Saginaw
Kimberly Mason - City of Saginaw
Dave Favero - RACER
Michael Tomka - CRA

September 26, 2011

RACER Trust
Grant Trigger
2930 Ecorse Rd. 2nd Floor
Ypsilanti, MI 48198

**RE: FORMER GM POWERTRAIN, SAGINAW MALLEABLE IRON FOUNDRY AND MOTORS LIQUIDATION
COMPANY WASTEWATER DISCHARGE PERMIT, 77 W. CENTER AVE., SAGINAW, MI 48605**

Dear Mr. Trigger:

This letter addresses consultant Mike Tomka of Conestoga-Rovers & Associates request for discharge permit termination. The following items will be required before proceeding with the permit closure.

The 42" and 24" sewer bulkheads must be completed properly in order for the City to terminate the requirements of the discharge permit. As of September 13, 2011, the 42" and 24" sewers that connect to the 60" sewer still discharge to the City's collection system. The 42" sewer plug that has been installed was not approved by the City and does not meet the City's or Michigan Department of Transportation's (MDOT) sewer bulkhead criteria. All sewers must be completely disconnected and there shall not be any discharge into the City's collection system from the site. Once this is accomplished and confirmed, the City will proceed with closure of the site's discharge permit.

The following bulkhead procedures must be followed in order for City inspectors to approve the 42" and 24" sewer discharge abandonment.

1. A section of the pipes to be bulk headed must be completely severed and removed for a disconnection.
2. Both sides of bulkheads shall contain wall structures and encasements in accordance with the attached procedure.
3. Both sides of the bulkheads must also be capped with an epoxy coating designed to prevent infiltration into the City's sewer system.
4. Inspection by City personnel before burial.

Please contact me if there are any questions.

Sincerely,

Jason Casteel
Environmental Compliance Administrator
City of Saginaw Wastewater Treatment Facility
jcasteel@saginaw-mi.com
989-759-1523

Enclosures (3)

Cc: Mike Tomka



November 18, 2011

Mr. Jason Casteel
City of Saginaw Waste Water Treatment Division
Environmental Compliance
2406 Veterans Memorial Parkway
Saginaw, Michigan
U.S.A. 48601

Dear Mr. Casteel:

Re: Termination of Wastewater Discharge
GMPT Saginaw Malleable Iron (SMI), Saginaw, Michigan

This letter is submitted on behalf of the Revitalizing Automotive Community Environmental Response (RACER) Trust and has been prepared in response to your September 26, 2011 letter regarding sewer bulkheading. We apologize for the delay in submitting this response. The City of Saginaw's (City) September 26, 2011 letter requests that the installation of bulkheads be completed properly (i.e. no discharge to the City's sewer) in order for the City to terminate the requirements of the discharge permit. The City's letter references 42" and 24" sewer bulkheads. We understand these to be at the locations of manholes/chambers FEE14.6 and FA19.5, respectively.

42-Inch Bulkhead (near FEE 14.6)

A bulkhead was installed in August 2011 in the 42-inch sewer (near FEE14.6) where it discharges into the 60-inch sewer. The bulkhead installation consisted of the following (see photographs dated August 26, 2011):

- Excavate and expose the pipe
- Cut into the pipe
- Place cement bags in upstream side of pipe to keep water out of pipe (cement bags left in place)
- Install standard brick bulkhead on downstream side placing bricks lengthwise and grout in place with mortar

- Fill 3-4 feet of pipe between cement bags and brick bulkhead with 2 cubic yards of concrete
- Backfilled excavation on August 29, 2011

On August 1, 2011 CRA completed an inspection of the bulkhead installed in the 42-inch sewer near FEE14.6. Seepage was observed coming through the bulkhead as seen on the photograph dated August 31, 2011. On September 13, 2011, the bulkhead was repaired using Waterplug and hydro-cement to seal the entire bulkhead outer wall, with extra material packed along the bottom of the pipe (see photographs dated September 23, 2011). The repair was inspected 10 days later and no seepage was observed. We believe that the bulkhead, as installed, is consistent with the attachments to the City's letter dated September 26, 2011. With this letter, we request relief from the procedure identified in your September 26, 2011 letter, since the bulkhead has been repaired, re-inspected following repair, and is not discharging into the City sewer.

The current bulkhead installation is consistent with standard construction practice for sewer bulkheading. In addition, the bulkheading procedure provided in your letter is more extensive than identified in the attachments to your letter (removal of a section of pipe, bulkhead both ends, and epoxy both ends).

24-Inch Bulkhead (near FA19.5)

A bulkhead was installed in the 24-inch sewer upstream of manhole FA19.5. The bulkhead installation was completed on June 9, 2010 during the demolition activities and consisted of the following:

- excavate and expose the pipe
- cut out a section of exposed pipe
- install circular concrete disc in each side of the exposed pipe braced using bricks
- filled the annular space between the concrete discs with concrete
- backfill excavation

On August 30, 2011, CRA and the City inspected all the manholes where bulkheads were previously installed. The only location of concern identified during the inspection was at manhole FA19.5 where flow was observed. It is important to note that the invert of the 24-inch pipe is approximately 12 feet below ground surface which is below the water table. The bulkhead at FA19.5 was replaced the week of October 24, 2011 consistent with the City procedures outlined in the September 23, 2011 letter (see photographs dated October 24, 2011).

We believe that the work as completed meets the objective of terminating discharges to the City sewer system. We appreciate your concerns and believe that our efforts corrected the leak from 42 inch bulkhead and with your input have properly terminated the connection to the 24 inch sewer. Consequently we believe we meet the conditions for termination of the discharge permit and as that you take the necessary actions to terminate the permit.

November 18, 2011

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If you have any further questions please let me know.

Thank you for your consideration in this matter.

Yours truly,

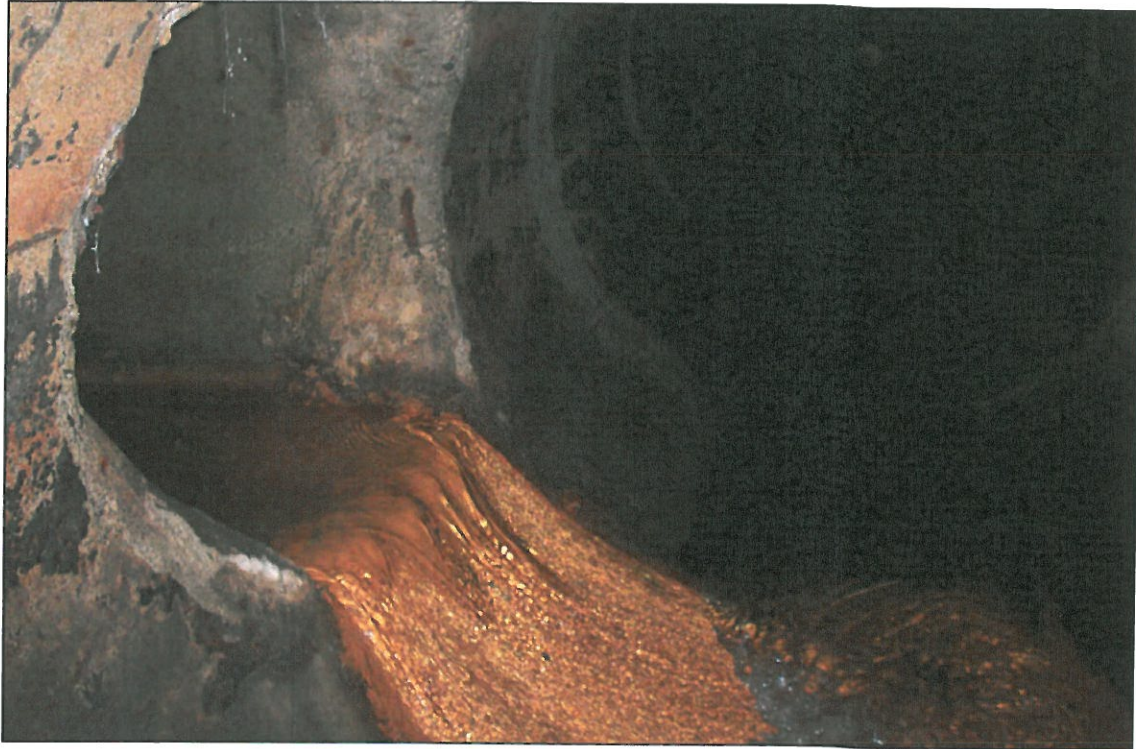


Grant Trigger
Michigan Cleanup Manager

Encl.

cc: Jeanette Best - City of Saginaw
Kimberly Mason - City of Saginaw
Dave Favero - RACER
Michael Tomka - CRA

ATTACHMENT 1
PHOTOGRAPHIC LOG



PHOTOGRAPH LOG
MANHOLE/CHAMBER FEE 14.6 (AUGUST 26, 2011)
FORMER SAGINAW MALLEABLE IRON PLANT
Saginaw, Michigan





PHOTOGRAPH LOG
MANHOLE/CHAMBER FEE 14.6 (AUGUST 26, 2011)
FORMER SAGINAW MALLEABLE IRON PLANT
Saginaw, Michigan





PHOTOGRAPH LOG
MANHOLE/CHAMBER FEE 14.6 (AUGUST 26, 2011)
FORMER SAGINAW MALLEABLE IRON PLANT
Saginaw, Michigan





PHOTOGRAPH LOG
MANHOLE/CHAMBER FEE 14.6 (AUGUST 31, 2011)
FORMER SAGINAW MALLEABLE IRON PLANT
Saginaw, Michigan





PHOTOGRAPH LOG
MANHOLE/CHAMBER FEE 14.6 (SEPTEMBER 23, 2011)
FORMER SAGINAW MALLEABLE IRON PLANT
Saginaw, Michigan





PHOTOGRAPH LOG
MANHOLE/CHAMBER FA 19.5 (OCTOBER 24, 2011)
FORMER SAGINAW MALLEABLE IRON PLANT
Saginaw, Michigan





PHOTOGRAPH LOG
MANHOLE/CHAMBER FA 19.5 (OCTOBER 24, 2011)
FORMER SAGINAW MALLEABLE IRON PLANT
Saginaw, Michigan





PHOTOGRAPH LOG
MANHOLE/CHAMBER FA 19.5 (OCTOBER 24, 2011)
FORMER SAGINAW MALLEABLE IRON PLANT
Saginaw, Michigan





PHOTOGRAPH LOG
MANHOLE/CHAMBER FA 19.5 (OCTOBER 24, 2011)
FORMER SAGINAW MALLEABLE IRON PLANT
Saginaw, Michigan



CITY OF SAGINAW TREASURER
 WASTEWATER ENVIRONMENTAL COMPLIANCE
 1315 S. WASHINGTON AVENUE
 SAGINAW, MI 48601
 (989)759-1523

RACER Trust
 ATTN: MONICA WALLINGFORD
 2930 ECORSE RD.
 YPSILANTI, MI 48198

QUARTERLY STATEMENT
 ANY PAYMENT OR CHARGES AFTER THE DATE BELOW
 WILL APPEAR ON YOUR NEXT STATEMENT

EC - ENVIRONMENTAL COMPLIANCE

CUSTOMER NO:	DATE
517/68442	3/06/12

TOTAL DUE:	DUE DATE
\$7,386.72	4/05/12

Remit and make check payable to:
 City of Saginaw Treasurer
 Please allow 5-7 days for your
 payment to be processed.

Please return top portion of this statement with your remittance to ensure proper credit to your account.
 Please retain the lower portion of this statement for your records.

DATE	DESCRIPTION	REF-NUMBER	DUE DATE	TOTAL AMOUNT
1/13/12	BEGINNING BALANCE			
2/20/12	PAYMENT			499.55
3/06/12	TEST/SAMP/INSP/ADM FEES			612.83
	CONSENT ORDER ADMIN.			7,500.00
	ANNUAL OVERSIGHT CHARGES FOR 2011			
	CONSENT ORDER EFFECTIVE 12/03/01			
	FORMER GENERAL MOTORS CORPORATION			
	POWERTRAIN DIVISION			
	SAGINAW MALLEABLE IRON PLANT			
RECEIVED MAR - 8 2012 RECEIVED MAR - 8 2012				
CURRENT	0-15 DAYS	16-45 DAYS	OVER 60	BALANCE
\$7,500.00				\$7,386.72

CUSTOMER NOTES: