



April 14, 2016

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 2016 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 2016 (January 1, 2016 through March 31, 2016).

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

Yours truly,

GHD

A handwritten signature in black ink, appearing to read "J. Pardys". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John-Eric Pardys, P.Eng.

JEP/kf/30

Encl. Attachment A – First Quarter 2016 Progress Report

cc: Rick Parson, MDEQ (via e-mail)
Saginaw Public Library (Public Information Repository)
David Favero, RACER (via e-mail)
Michael Tomka, GHD (via e-mail)

Attachment A
First Quarter 2016 Progress Report
Performance-Based Administrative
Order on Consent
Former Saginaw Nodular Iron, Saginaw, MI
January 1, 2016 to March 31, 2016

Attachment A

Work Performed this Quarter

The following work was performed during the first quarter of 2016 at the Nodular facility:

- Completed and submitted SWPPP annual review form on January 5, 2016.
- Prepared and submitted the fourth quarter progress report for 2015 on January 11, 2016.
- Demolition of the WWTP and associated appurtenances is essentially complete. (Please note that this work was not part of corrective action). As part of the demolition activities there was some material that was characterized and re-located on-Site.
- Continued evaluation of existing data to determine if further investigation is necessary to support selection of corrective measures.
- Submitted annual EI data letter on February 10, 2016.
- Completed additional characterization of sediments, underlying soil, and water in the Secondary Pond and Lagoon 5 in March 2016.
- Prepared NPDES renewal application.
- Submitted monthly electronic discharge monitoring reports for NPDES permit. There were multiple discharge events from Outfall 021A (Secondary Pond) and Outfall 022A (North Ditch) during this reporting period. There were no exceedances of discharge limits. Completed periodic inspections for SWPPP and collected level measurements of secondary pond and North Ditch.

Data Available During this Quarter

- NPDES discharge sampling data was posted by March 20, 2016 for the discharges in February 2016. A copy of the electronic discharge monitoring reports is provided in Attachment A.1. The discharge sampling data collected in March will be posted by April 20, 2016 and will be included in the next quarterly report.
- A memorandum summarizing the results of the Secondary Pond and Lagoon 5 characterization will be provided under separate cover.
- As part of the demolition, material was characterized and re-located on-Site. The data will be provided in a separate memo.

Problems Encountered

None.

Summary of Problem Resolution

None.

Estimated Percent Complete and Information Summary for Selected Activities

Task	Estimated % Complete
1. IU G – FORMER NODULAR IRON PLANT OM&M	80%
<u>Annual EI Sampling (5-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, anticipated to occur in 2016)	
<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 reporting was submitted to U.S. EPA February 10, 2015.• 2015 EI sampling was completed in November 2015 and reporting was submitted to U.S. EPA February 10, 2016.	
<u>Additional delineation of impacts in soil</u>	
<ul style="list-style-type: none">• 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.• Additional delineation of manganese and PCB impacts was completed during March and April 2015. A summary of the investigation was submitted to U.S. EPA on May 8, 2015.• Work plan for additional delineation of PCB impacts in soil above 10 mg/kg in the south portion of IU G submitted to U.S. EPA on July 15, 2015 and approved by U.S. EPA on July 30, 2015.• Additional delineation of PCB impacts above 10 mg/kg was completed in August 2015. A summary of the investigation is being prepared.• Review available data to evaluate if additional delineation is necessary for impacted soil at the overall Site.	
<u>Ammonia concentrations above MDEQ Groundwater Surface Water Interface Criteria</u>	
<ul style="list-style-type: none">• Ammonia in groundwater evaluation was submitted to U.S. EPA on April 6, 2015 and to MDEQ on April 8, 2015.	

Task	Estimated % Complete
2. IU H – WWTP CLOSURE	
<u>Secondary Pond</u>	85%
<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. • MDEQ modified NPDES sampling requirements with most of the requested changes in RACER's January 8, 2015 request. • Additional Characterization Study on Secondary Pond and Lagoon 5 completed in March 2016. • NPDES renewal application prepared. • 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. 	
<u>Primary Basins</u>	100%
<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. 	
<u>North Ditch</u>	45%
<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/agreements to perform work <ul style="list-style-type: none"> – Joint permit was received on August 19, 2015. – Floodplain permit application was prepared and submitted to the City of Saginaw on May 4, 2015. – Other permits needed include: County of Saginaw soil erosion and sedimentation control permit. – Other agreements: access from adjacent property owners. • Implement approved plan (pending). 	

Task	Estimated % Complete
3. IU I- AREA CLOSURE	
<u>Classified Sand Pile</u>	75%
<ul style="list-style-type: none"> • Removed all classified sand pile as part of the primary basin stabilization work. • Review available data to evaluate if additional characterization is necessary for impacted soil. 	
4. IU I – STAGING AREA OM&M	NA
<ul style="list-style-type: none"> • No activities proposed or pending at this time. 	
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 2015 EA Budget Authorization Request on November 20, 2014 • U.S. EPA approved the 2015 Annual EA Budget Amendment No. 1 on March 20, 2015 • U.S. EPA approved the 2016 EA Budget Authorization Request on November 20, 2015. 	
RCRA Corrective Action Reporting	60%
<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 – Submit revised Corrective Measures Proposal – TBD. • Submitted Summary of WMU status to U.S. EPA on January 22, 2015 and to MDEQ on January 26, 2015. • Prepared response to comments from U.S. EPA on the Supplemental RFI and CMP – To be determined (TBD). 	

Task	Estimated % Complete
<ul style="list-style-type: none"> • Prepare Declaration of Restrictive Covenant – TBD. • Prepare Corrective Measures Implementation Plan – TBD. • Prepare Final Remedy Construction Completion Report – TBD. 	
<hr/>	
Other Related Reporting	
<ul style="list-style-type: none"> • DEQ issued NPDES permit for the Site on August 24, 2012. • Submit monthly DMRs. 	<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. There were discussions with a potential buyer for a portion of the Site and with MDEQ and U.S. EPA with respect to possible wetlands in the portion of the Site being considered for purchase.

Projected Work for Next Reporting Period

- Submit NPDES permit renewal application.
- Complete review of existing data to evaluate if additional delineation is necessary of impacted soil at the Site.
- Prepare memorandum summarizing the results of the additional characterization of the Secondary Pond and Lagoon 5 and complete additional characterization if necessary
- Update SWPPP to incorporate recent work completed at the Site.
- Continue to work with adjacent property owners to obtain needed authorizations to complete the North Ditch work and prepare bid documents.
- Prepare responses to or meet with U.S. EPA to discuss any comments on the Supplemental RFI Report and Draft CMP.
- Coordinate with potential buyer from environmental perspective as necessary.
- 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).

Attachment A-1
MiWaters
DMR February 2016 Discharge Summary

No Discharge

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq	Sample Type
Flow 50050 Final Effluent (1)	Sample Measurement	<input type="text" value="0.427"/>	<input type="text" value="0.427"/>	****	****	****	****	Weekly when Discharging	Recorded Daily Flow
	Permit Requirement	(Report) Maximum Monthly Average	(Report) Maximum Daily	****	****	****	****	Weekly when Discharging	Recorded Daily Flow
Total Suspended Solids 00530 Final Effluent (1)	Sample Measurement	****	****	****	<input type="text" value="5.33"/>	<input type="text" value="6"/>	mg/L	Weekly when Discharging	3-Portion Composite
	Permit Requirement	****	****	****	35 Maximum Monthly Average	70 Maximum Daily	****	Weekly when Discharging	3-Portion Composite
Carbonaceous Biochemical Oxygen Demand (CBOD5) 80082 Final Effluent (1)	Sample Measurement	****	****	****	****	<input type="text" value="2"/>	mg/L	Daily when Discharging	Grab
	Permit Requirement	****	****	****	****	28 Maximum Daily	****	Daily when Discharging	Grab
Ammonia Nitrogen (as N) 00610 Final Effluent (1)	Sample Measurement	****	****	****	****	<input type="text" value="0.2"/>	mg/L	Weekly when Discharging	Grab
	Permit Requirement	****	****	****	****	10 Maximum Daily	****	Weekly when Discharging	Grab
Outfall Observation 84130 Final Effluent (1)	Sample Measurement	<input type="text" value="yes"/>	****	****	****	****	****	Weekly when Discharging	Visual
	Permit Requirement	(Report) Yes/No	****	****	****	****	****	Weekly when Discharging	Visual
pH 00400 Final Effluent (1)	Sample Measurement	****	****	<input type="text" value="8.39"/>	****	<input type="text" value="8.51"/>	SU	Daily when Discharging	Grab
	Permit Requirement	****	****	6.5 Minimum Daily	****	9.0 Maximum Daily	****	Daily when Discharging	Grab

OUTFALL 021A

Dissolved Oxygen 00300 Final Effluent (1)	Sample Measurement	****	****	****	*H	****	****	mg/L	Daily when Discharging	Grab
	Permit Requirement	****	****	****	6.0 Minimum Daily	****	****		Daily when Discharging	Grab
Turbidity 00070 Final Effluent (1)	Sample Measurement	****	****	****	*G	*G		NTU	Weekly when Discharging	Grab
	Permit Requirement	****	****	****	80 Maximum Monthly Average	160 Maximum Daily			Weekly when Discharging	Grab


General Report Comments

No Discharge

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq	Sample Type
Flow 50050 Final Effluent (1)	Sample Measurement	<input type="text" value="0.0096"/>	<input type="text" value="0.0168"/>	MGD	****	****	****	Weekly when Discharging	Recorded Daily Flow
	Permit Requirement	(Report) Maximum Monthly Average	(Report) Maximum Daily		****	****	****	Weekly when Discharging	Recorded Daily Flow
Total Suspended Solids 00530 Final Effluent (1)	Sample Measurement	****	****	****	<input type="text" value="4.5"/>	<input type="text" value="5"/>	mg/L	Weekly when Discharging	3-Portion Composite
	Permit Requirement	****	****	****	35 Maximum Monthly Average	70 Maximum Daily		Weekly when Discharging	3-Portion Composite
pH 00400 Final Effluent (1)	Sample Measurement	****	****	<input type="text" value="7.44"/>	****	<input type="text" value="8.22"/>	SU	Weekly when Discharging	Grab
	Permit Requirement	****	****	6.5 Minimum Daily	****	9.0 Maximum Daily		Weekly when Discharging	Grab
Turbidity 00070 Final Effluent (1)	Sample Measurement	****	****	****	<input type="text" value="*G"/>	<input type="text" value="*G"/>	NTU	Weekly when Discharging	Grab
	Permit Requirement	****	****	****	80 Maximum Monthly Average	160 Maximum Daily		Weekly when Discharging	Grab

General Report Comments

No Discharge

Parameter	Flow 50050	Total Suspended Solids 00530	pH 00400	pH 00400	Turbidity 00070
Stage	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)
Limit	(Report) MGD	70 mg/L	6.5 SU	9.0 SU	160 NTU
Stat Base	Maximum Daily	Maximum Daily	Minimum Daily	Maximum Daily	Maximum Daily
2/1/2016					
2/2/2016					
2/3/2016	0.0168	5	7.44	7.44	*G 
2/4/2016					
2/5/2016					
2/6/2016					
2/7/2016					
2/8/2016					
2/9/2016					
2/10/2016					
2/11/2016					
2/12/2016					
2/13/2016					
2/14/2016					
2/15/2016					

MiWaters - DMR Detail - Daily
OUTFALL 022A

2/16/2016					
2/17/2016					
2/18/2016					
2/19/2016					
2/20/2016					
2/21/2016					
2/22/2016					
2/23/2016					
2/24/2016					
2/25/2016					
2/26/2016					
2/27/2016					
2/28/2016					
2/29/2016	0.0024	4	8.22	8.22	*G 

General Report Comments