

Worldwide Facilities Group Remediation Team

April 28, 2003

Ms. Cheryl Howe Senior Enviornmental Engineer Hazardous Waste Program Section Waste Management Division P.O. Box 30241 Lansing, MI 48909-7741

Dear Ms. Howe:

Re: Closure Certification for 4 Hazardous Waste Management Units

Saginaw Metal Casting Operations (SMCO)

Saginaw, Michigan MID 041 793 340

The following letter presents closure certification for four Resource Conservation and Recovery Act (RCRA) hazardous waste management units at SMCO in Saginaw, Michigan. The four units include the Hazardous Waste Control Tank (G.2), Paint Storage Building Drum Storage Area (G.3), Old Calcium Carbide Desulfurization Slag Treatment Unit (G.4), and the Existing Calcium Carbide Desulfurization Slag Treatment Unit (G.5).

1.0 HAZARDOUS WASTE CONTROL TANK (G.2)

1.1 BACKGROUND

In December 1987, RMT submitted a Closure Plan for Interim Hazardous Waste Control Tank (G.2 Closure Plan) at SMCO [Former Saginaw Nodular Iron Castings Plant]. A Michigan Department of Natural Resources (MDNR) response letter, dated April 28, 1988, denied approval for the plan. An Addendum to the G.2 Closure Plan was submitted to the MDNR in May 1988. The MDNR approved the Addendum to the Interim Status Closure Plan on June 10, 1988.

RMT completed closure activities and submitted a Documentation Report for RCRA Closure of a Hazardous Waste Control Tank to the MDNR on November 6, 1989.

1.2 CURRENT STATUS

The Michigan Department of Environmental Quality (MDEQ [formerly MDNR]) issued comments on the Closure Documentation Report for the hazardous waste control tank in a letter dated May 24, 1999.

General Motors (GM) submitted a response letter to the MDEQ's Technical Comments for the hazardous waste control tank on January 9, 2001. This technical letter addressed all outstanding issues with regards to the closure of the area.

2.0 PAINT STORAGE BUILDING DRUM STORAGE AREA (G.3)

2.1 BACKGROUND

In December 1987, RMT submitted a Closure Plan for Interim Status Paint Storage Building Drum Storage Area (G.3 Closure Plan) at SMCO. A MDNR response letter, dated April 28, 1988, denied approval for the plan. An Addendum to the G.3 Closure Plan was submitted to the MDNR in May 1988. The MDNR approved the revised closure plans for 4 areas, including the G.3 Closure Plan on June 10, 1988.

RMT completed closure activities and submitted a Documentation Report for RCRA Closure of a Status Paint Storage Building Drum Storage Area to the MDNR on November 6, 1989.

2.2 CURRENT STATUS

The MDEQ issued comments on the October 30, 1989 Closure Certification Report, for the Paint Storage Building Drum Storage Area, in a letter dated May 24, 1999.

GM submitted a response letter to the MDEQ's Technical Comments on the Paint Storage Building Drum Storage Area Report on January 9, 2001. This technical letter addressed all outstanding issues with regards to the closure of the area.

3.0 OLD CALCIUM CARBIDE DESULFURIZATION SLAG TREATMENT UNIT (G.4)

3.1 BACKGROUND

In December 1987, RMT submitted an Interim Status Closure Plan for the Old Calcium Carbide Desulfurization Slag Treatment Unit (G.4 Closure Plan) at SMCO. A MDNR response letter, dated April 28, 1988, denied approval for the plan. An Addendum to the G.4 Closure Plan was submitted to the MDNR in May 1988. The MDNR approved the revised closure plans for 4 areas, including the G.4 Closure Plan on June 10, 1988.

GM requested further amendments to the G.4 Closure Plan in a letter dated July 23, 1988. The MDNR approved the G.4 Closure Plan amendments in a letter dated September 26, 1988.

RMT completed closure activities and submitted a Documentation Report for RCRA Closure of the Old Calcium Carbide Desulfurization Slag Treatment Unit to the MDNR on October 30, 1991.

3.2 CURRENT STATUS

The MDEQ issued comments on the October 30, 1991 Closure Documentation Report, for the Old Calcium Carbide Desulfurization Slag Treatment Unit, in a letter dated May 24, 1999. The MDEQ recommended that GM choose whether to complete the review of the report using Act 307 criteria (appropriate for the time that they were submitted) or use current standards under Act 451 Part 201.

GM submitted a response letter to the MDEQ's Technical Comments on the Old Calcium Carbide Desulfurization Slag Treatment Unit on September 11, 2001. This technical letter addressed all outstanding issues with regards to the closure of the area. The responses utilized data collected from the Phase 1A and 1B SMCO RCRA Facility Investigation (RFI), in order to address outstanding groundwater issues under Part 201.

4.0 EXISTING CALCIUM CARBIDE DESULFURIZATION SLAG TREATMENT UNIT

4.1 BACKGROUND

In December 1987, RMT submitted an Interim Status Closure Plan for the Existing Calcium Carbide Desulfurization Slag Treatment Unit (G.5 Closure

Plan) at SMCO. A MDNR response letter, dated April 28, 1988, denied approval for the plan. An Addendum to the G.5 Closure Plan was submitted to the MDNR in May 1988. The MDNR approved the revised closure plans for 4 areas, including the G.5 Closure Plan on June 10, 1988.

GM requested further amendments to the G.5 Closure Plan in a letter dated July 23, 1988. The MDNR approved the G.5 Closure Plan amendments in a letter dated September 26, 1988.

RMT completed closure activities and submitted a Documentation Report for RCRA Closure of the Existing Calcium Carbide Desulfurization Slag Treatment Unit to the MDNR on October 30, 1991.

4.2 CURRENT STATUS

The MDEQ issued comments on the October 30, 1991 Closure Documentation Report, for the Existing Calcium Carbide Desulfurization Slag Treatment Unit, in a letter dated May 24, 1999. The MDEQ recommended that GM choose whether to complete the review of the report using Act 307 criteria (appropriate for the time that they were submitted) or use current standards under Act 451 Part 201.

GM submitted a response letter to the MDEQ's Technical Comments on the Existing Calcium Carbide Desulfurization Slag Treatment Unit on September 11, 2001. This technical letter addressed all outstanding issues with regards to the closure of the area. The responses utilized data collected from the Phase 1A and 1B SMCO RFI, in order to address outstanding groundwater issues under Part 201.

5.0 CERTIFICATION OF CLOSURE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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 the possibility of fine and imprisonment for knowing violations.

Michael R. Tornka, P.E. CRA Engineering, Inc.

William McFarland General Motors Corporation

William Marland

Sincerely,

Cheryl R. Hiatt Project Coordinator

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