



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

May 8, 2015

Mr. Grant Trigger  
Cleanup Manager – Michigan  
RACER Trust  
500 Woodward Avenue, Suite 1510  
Detroit, Michigan 48226

Dear Mr. Trigger:

SUBJECT: Approval of Certification of Closure of Nodular Iron Oil House RCRA Hazardous Waste Storage Area; RACER Trust/Former General Motors Corporation (GM), Saginaw Metal Casting Operations - MID 041 793 340

The Department of Environmental Quality (DEQ), Office of Waste Management and Radiological Protection (OWMRP), has completed its review of the certification of closure for the Nodular Iron Oil House RCRA Hazardous Waste Storage Area at the GM, Saginaw Metal Casting Operations that was submitted on July 26, 1999. Based upon a review of the information provided in the certification and additional information submitted by Mr. David Favero on January 26, 2015, the OWMRP has determined that GM should have been released from closure responsibility for this container storage area as part of the final closure certification/financial release letter sent by the DEQ on February 27, 2004, which is enclosed. Following a detailed review of our files, it appears that this omission from the 2004 letter was most likely caused due to the certification for this hazardous waste container storage area being submitted separately from the certifications for the other four closed units and confusion resulting from the similarity in the names of some of the hazardous waste storage areas.

The OWMRP hereby approves the closure certification for the Nodular Iron Oil House RCRA Hazardous Waste Storage Area and now considers closure of all of the hazardous waste management units at the facility to be complete. The OWMRP is in the process of correcting and updating the closure status of these closed units in the DEQ's Waste Data System.

Should you have any questions regarding this approval, please contact Ms. Cheryl Howe, OWMRP, at 517-284-6561 or [howec@michigan.gov](mailto:howec@michigan.gov); or you may contact me at 517-284-6565 or [montgomeryd1@michigan.gov](mailto:montgomeryd1@michigan.gov); or you may contact either of us at DEQ, OWMRP, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,

DeLores Montgomery, Chief  
Hazardous Waste Section  
Office of Waste Management and  
Radiological Protection

Enclosure

cc/enc: Mr. David Favero, RACER Trust  
Mr. Nate Nemani, EPA  
Mr. Phil Roycraft/Ms. Trisha Confer, DEQ  
Ms. Ginny Himich/Mr. Rich Conforti/Ms. Mary Carnagie, DEQ  
Ms. Cheryl Howe, DEQ  
HWS/C&E File



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



STEVEN E. CHESTER  
DIRECTOR

February 27, 2004

CERTIFIED MAIL

Ms. Cheryl R. Hiatt, Project Coordinator  
General Motors Corporation  
Worldwide Facilities Group - Remediation Team  
MC-483-520-190  
2000 Centerpoint Parkway  
Pontiac, Michigan 48341-3147

Dear Ms. Hiatt:

SUBJECT: Certification of Final Closure of Hazardous Waste Management Units  
General Motors Corporation, Saginaw Metal Casting Operations  
MID 041 793 340

The Michigan Department of Environmental Quality (MDEQ), Waste and Hazardous Materials Division (WHMD), has completed its review of the certifications of closure for the General Motors Corporation (GMC), Saginaw Metal Casting Operations (Facility) based upon the information provided in your April 28, 2003, letter to Ms. Cheryl Howe. Previous closure certification information was submitted on November 6, 1989, October 30, 1991, January 9, 2001, and September 11, 2001. The four hazardous waste management units covered by these closure certifications are the Hazardous Waste Control Tank, the Paint Storage Building Drum Storage Area, the Old Calcium Carbide Desulfurization Slag Treatment Unit, and the Existing Calcium Carbide Desulfurization Slag Treatment Unit. Based on this review, the GMC is hereby released from its closure responsibilities for the four hazardous waste management units at the Facility under Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and its administrative rules, Michigan Administrative Code R 299.9101 *et seq.* The GMC is, therefore, no longer required to demonstrate financial capability for closure and liability coverage of the four hazardous waste management units at the Facility.

Facility Status

With this acceptance of the certification of closure, the Facility can no longer be operated as a hazardous waste treatment, storage, or disposal facility. If hazardous waste is generated at the Facility, it must be managed in accordance with all applicable generator requirements in R 299.9301 through R 299.9312.

Financial Capability

The GMC demonstrates financial assurance for closure of the Facility by use of Surety Bond Number M2022532. In accordance with R 299.9703(5), this acceptance of the certification of closure constitutes a release from the requirement to maintain such financial assurance for the Facility. The bond also includes financial assurance for post-closure of

the Facility. The need for any long-term post-closure exposure controls or monitoring is being deferred to corrective action. At this time, the United States Environmental Protection Agency (U.S. EPA) is the lead regulatory agency for the Facility's corrective action requirements. By separate letter, the MDEQ will authorize the cancellation of the bond.

The GMC demonstrates financial responsibility for liability coverage of the Facility by use of an insurance policy. In accordance with R 299.9710(16), this acceptance of the certification of closure constitutes a release from the requirement to maintain such financial responsibility. The GMC is no longer required to include the Facility on the insurance endorsement used to demonstrate the required liability coverage.

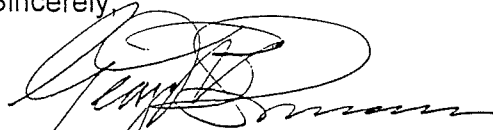
#### Corrective Action

This acceptance of the certification of closure does not constitute a release from any corrective action responsibilities that the GMC may have under Part 111 or under the federal Resource Conservation and Recovery Act of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984. In addition to the responsibility to close regulated hazardous waste management units, owners and operators are responsible to conduct corrective actions for releases of hazardous wastes and hazardous waste constituents from waste management units.

The MDEQ has not received the deed notice for the Facility as required by R 299.9525. This violation has been entered into the MDEQ's Waste Data System, which also is reflected in the U.S. EPA's Enforcement and Compliance History Online system. This deed notice must be filed as soon as possible. For more information, please contact Mr. Clay Spencer, Hazardous Waste and Radiological Protection Section (HWRPS), WHMD, at 517-373-7968.

If you have any questions regarding this letter, please contact Ms. Howe, HWRPS, at 517-373-9881.

Sincerely,



George W. Bruchmann, Chief  
Waste and Hazardous Materials Division  
517-373-9523

cc: Mr. William McFarland, GMC  
Mr. Peter Ramanauskas, U.S. EPA  
Ms. Liane Shekter Smith, MDEQ  
Mr. Stephen Buda, MDEQ  
Ms. De Montgomery, MDEQ  
Mr. Terry Walkington, MDEQ  
Mr. Steve Sliver, MDEQ  
Ms. Cheryl Howe, MDEQ  
Mr. Clay Spencer, MDEQ  
Mr. Ron Stone, MDEQ  
Base File