



**CONESTOGA-ROVERS
& ASSOCIATES**

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

October 10, 2013

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: Third Quarter 2013 Progress Report
Performance-Based Administrative Order on Consent
RCRA Corrective Action
Saginaw Nodular Iron, 2100 Veterans Memorial Parkway, Saginaw, MI
USEPA 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 (USEPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for the third quarter of 2013 (July 1, 2013 through September 30, 2013).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

JEP/kf/16

Encl. Attachment A - Third Quarter 2013 Progress Report

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

ATTACHMENT A

THIRD QUARTER 2013 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
FORMER SAGINAW NODULAR IRON, SAGINAW, MI
JULY 1, 2013 TO SEPTEMBER 30, 2013

ATTACHMENT A

WORK PERFORMED THIS QUARTER

The following work was performed during the third quarter of 2013 at the Nodular facility:

- Prepared and submitted the second quarter progress report for 2013 on July 11, 2013
- Conducted North Ditch Investigation and additional monitoring in accordance with the U.S. EPA approved Sampling and Analysis Plan (SAP) for the North Ditch the week of July 15, 2013
- Prepared and submitted Construction Completion Report for the work associated with the Primary Settling Basins (PSBs) Stabilization on September 4, 2013
- Completed PSB Stabilization soil erosion and sedimentation control permit close-out
- Began preparation of 2014 EA Budget Request
- Began preparation of data summary memorandum for the North Ditch Investigation and additional groundwater monitoring
- Submitted monthly electronic discharge monitoring report for NPDES permit
- Completed periodic inspections for SWPPP and level measurements of secondary pond

DATA AVAILABLE DURING THIS QUARTER

- North Ditch Investigation and additional groundwater monitoring will be provided 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>
1. IU G – Former Nodular Iron Plant OM&M	25%
<ul style="list-style-type: none">• 3-years of EI sampling complete• 2011 EI sampling was completed in November 2011 and reporting was submitted to U.S. EPA April 18, 2012	

ATTACHMENT A

<u>Task</u>	<u>Estimated % Complete</u>
<ul style="list-style-type: none"> • 2012 EI sampling was completed in November 2012 and reporting was submitted to U.S. EPA March 11, 2013 	
2. IU H - WWTP Closure	60%
<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 • 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 • Bid documents and stabilization work plan for primary settling basins completed • Primary settling basin stabilization work was completed June 20, 2013. • Developed options for addressing the North Ditch • Sampling and Analysis Plan for the North Ditch submitted to U.S. EPA on April 26, 2013 • North Ditch Investigation and additional monitoring completed the week of July 15, 2013 	
3. IU I- Area Closure	90%
<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	0%
5. Other - RCRA Corrective Action Reporting and Other Related 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 	

ATTACHMENT A

SUMMARY OF CONTACTS WITH INTERESTED PARTIES.

- Communication regarding potential sale and future use of property with local community governmental and economic development representatives continues.

PROJECTED WORK FOR NEXT REPORTING PERIOD

- Finalize and submit memorandum summarizing the North Ditch Investigation and additional groundwater monitoring
- Complete evaluation of options to address the North Ditch
- 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
- Begin preparation of Deed Restrictions
- Prepare Due Care Plan