



July 15, 2015

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: Second Quarter 2015 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 second quarter of 2015 (April 1, 2015 through June 30, 2015).

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", with a stylized flourish at the end.

John-Eric Pardys, P.Eng.

JEP/kf/26

Encl. Attachment A – Second Quarter 2015 Progress Report

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

Attachment A  
Second Quarter 2015 Progress Report  
Performance-Based Administrative  
Order on Consent  
Former Saginaw Nodular Iron, Saginaw, MI  
April 1, 2015 to June 30, 2015

## **Attachment A**

### **Work Performed this Quarter**

The following work was performed during the second quarter of 2015 at the Nodular facility:

- Prepared and submitted the first quarter progress report for 2015 on April 10, 2015.
- Prepared and submitted evaluation of ammonia concentrations above Groundwater Surface Water Interface Criteria in groundwater in IU G to U.S. EPA on April 6, 2015 and to MDEQ on April 8, 2015.
- Prepared and submitted responses to comments from MDEQ on the U.S. Army Corps of Engineers/MDEQ Joint Permit Application for work in floodplains for the proposed North Ditch work on April 10, 2015. Continued effort to obtain adjacent property owner approval to complete the proposed work and was notified that the adjacent City of Saginaw WWTP has two previously unknown storm water outfalls to the North Ditch.
- Prepared and submitted City of Saginaw floodplain permit application on May 4, 2015.
- Received a response from the MDEQ on May 8, 2015 regarding the summary of Waste Management Unit (WMU) status that was submitted in January 2015. The MDEQ's Office of Waste Management and Radiological Protection (OWMRP) considers closure of all the hazardous WMUs at the facility complete. The MDEQ Waste Data System was updated to reflect this change. Prepared and submitted results of the additional delineation of manganese and PCB impacts in soil in the south portion of IU G on May 11, 2015.
- Prepared and submitted draft presentation summarizing the Site for use by U.S. EPA on May 19, 2015
- Submitted monthly electronic discharge monitoring reports for NPDES permit. There was one discharge event in April and one discharge event in June at Outfall 022A (North Ditch). The sampling results met the NPDES discharge permit 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 in MDEQ's eDMR system by May 20, 2015 for the discharges in April and by July 6, 2015 for the discharges in June. A copy of the electronic discharge monitoring reports are provided in Attachment A.1.

### **Problems Encountered**

None.

### **Summary of Problem Resolution**

None.

## Estimated Percent Complete and Information Summary for Selected Activities

<u>Task</u>	<u>Estimated % Complete</u>
<p>1. IU G – FORMER NODULAR IRON PLANT OM&amp;M</p> <p><u>Annual EI Sampling (4-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)</p> <ul style="list-style-type: none"> <li>• 2011 EI sampling was completed in November 2011 and reporting was submitted to U.S. EPA April 18, 2012</li> <li>• 2012 EI sampling was completed in November 2012 and reporting was submitted to U.S. EPA March 11, 2013</li> <li>• 2013 EI Sampling was completed in November 2013 and reporting was submitted to U.S. EPA February 13, 2014</li> <li>• 2014 EI sampling was completed in November 2014 and reporting was submitted to U.S. EPA February 10, 2015</li> </ul> <p><u>Additional delineation of impacts in soil</u></p> <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> <li>• Review available data to evaluate if additional delineation is necessary for impacted soil at the overall Site.</li> </ul> <p><u>Ammonia concentrations above MDEQ Groundwater Surface Water Interface Criteria</u></p> <ul style="list-style-type: none"> <li>• Ammonia in groundwater evaluation was submitted to U.S. EPA on April 6, 2015</li> </ul>	70%
<p>2. IU H – WWTP CLOSURE</p> <p><u>Secondary Pond</u></p> <ul style="list-style-type: none"> <li>• Characterization Study on Secondary Pond completed in June of 2011</li> </ul>	75%

<b><u>Task</u></b>	<b><u>Estimated % Complete</u></b>
<ul style="list-style-type: none"> <li>Emergency overflow for secondary pond installed on March 13, 2012</li> <li>MDEQ modified NPDES sampling requirements with most of the requested changes in RACER's January 8, 2015 request.</li> <li>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.</li> </ul>	
<b><u>Primary Basins</u></b>	<b>100%</b>
<ul style="list-style-type: none"> <li>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</li> <li>Primary settling basin stabilization work was completed June 20, 2013. A construction completion report was submitted to U.S. EPA on September 4, 2013</li> </ul>	
<b><u>North Ditch</u></b>	<b>45%</b>
<ul style="list-style-type: none"> <li>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</li> <li>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</li> <li>Stabilization Alternative Evaluation and Recommendation for the North Ditch was submitted to U.S. EPA on February 26, 2014</li> <li>Obtain necessary permits to perform work <ul style="list-style-type: none"> <li>Joint permit application was prepared and submitted to MDEQ on February 19, 2015</li> <li>Floodplain permit application was prepared and submitted to the City of Saginaw on May 4, 2015</li> <li>Other permits needed include: County of Saginaw soil erosion and sedimentation control permit</li> </ul> </li> <li>Implement approved plan</li> </ul>	

<b><u>Task</u></b>	<b><u>Estimated % Complete</u></b>
3. IU I- AREA CLOSURE	
<u>Classified Sand Pile</u> <ul style="list-style-type: none"> <li>Removed all classified sand pile as part of the primary basin stabilization work</li> </ul>	100%
4. IU I – STAGING AREA OM&M	NA
<ul style="list-style-type: none"> <li>No activities proposed or pending at this time</li> </ul>	
5. OTHER – RCRA CORRECTIVE ACTION REPORTING AND OTHER RELATED REPORTING	
<u>Budget Process</u> <ul style="list-style-type: none"> <li>U.S. EPA approved the 2012 EA Budget Authorization Request on December 22, 2011</li> <li>U.S. EPA approved the 2012 Annual EA Budget Amendment No. 1 on September 19, 2012</li> <li>U.S. EPA approved the 2013 EA Budget Authorization Request on January 3, 2013</li> <li>U.S. EPA approved the 2014 EA Budget Authorization Request on November 22, 2013</li> <li>U.S. EPA approved the 2015 EA Budget Authorization Request on November 20, 2014</li> <li>U.S. EPA approved the 2015 Annual EA Budget Amendment No. 1 on March 20, 2015</li> </ul>	On-going
RCRA Corrective Action Reporting	60%
<ul style="list-style-type: none"> <li>Submitted CCR documentation to U.S. EPA on November 18, 2011</li> <li>Submitted Supplemental RFI Report on September 28, 2012</li> <li>Submitted Draft Corrective Measures Proposal to U.S. EPA on April 1, 2013</li> <li>Submitted Summary of WMU status to U.S. EPA on January 22, 2015 and to MDEQ on January 26, 2015</li> <li>Prepare response to comments from U.S. EPA on the Supplemental RFI and CMP – To be determined (TBD)</li> </ul>	

<b><u>Task</u></b>	<b><u>Estimated % Complete</u></b>
<ul style="list-style-type: none"> <li>• Prepare Declaration of Restrictive Covenant - TBD</li> <li>• Prepare Corrective Measures Implementation Plan - TBD</li> <li>• Prepare Final Remedy Construction Completion Report - TBD</li> </ul>	
Other Related Reporting	
<ul style="list-style-type: none"> <li>• DEQ issued NPDES permit for the Site on August 24, 2012</li> <li>• Submit monthly DMRs</li> </ul>	<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. In addition, there were discussions with a potential buyer for a portion of the Site.

#### **Projected Work for Next Reporting Period**

- Prepare bid package for North Ditch work.
- Complete review of existing data to evaluate if additional delineation is necessary of impacted soil at the Site.
- Continue to work with adjacent property owners to obtain needed authorization to complete the North Ditch work.
- 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**

## **April and June 2015 NDPES Permitted Discharge Summary Data**



**Michigan Department of Environmental Quality Daily Discharge Monitoring Report (DMR)**

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust  
**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601  
**FACILITY:** RACER-Saginaw Nodular Indust  
**LOCATION:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601

**PERMIT NUMBER:** MI0059042  
**DISTRICT:** Saginaw Bay  
**COUNTY:** Saginaw  
**MONITORING POINT:** 021A  
**MONITORING PERIOD :** 2015-04-01 To: 2015-04-30

PARAMETER NAME	Flow	Total Suspended Solids	Carbonaceous Biochemical Oxygen Demand (CBOD5)	Ammonia Nitrogen (as N)	Outfall Observation	pH	Dissolved Oxygen
PARAMETER CODE	50050	00530	80082	00610	84130	00400	00300
MONITORING PT.	021A	021A	021A	021A	021A	021A	021A
STAGE CODE	1	1	1	1	1	1	1
UNIT	MGD	mg/l	mg/l	mg/l	yes/no	S.U.	mg/l
2015-04-01							
2015-04-02							
2015-04-03							
2015-04-04							
2015-04-05							
2015-04-06							
2015-04-07							
2015-04-08							
2015-04-09							
2015-04-10							
2015-04-11							
2015-04-12							
2015-04-13							
2015-04-14							
2015-04-15							
2015-04-16							
2015-04-17							
2015-04-18							
2015-04-19							
2015-04-20							
2015-04-21							
2015-04-22							
2015-04-23							
2015-04-24							
2015-04-25							
2015-04-26							
2015-04-27							
2015-04-28							
2015-04-29							
2015-04-30							
Name/Title of Principal Executive Officer Or Authorized Agent David Favero, Deputy Cleanup Manager, Michigan				Signature of Principal Executive Officer Or Authorized Agent David Favero		Telephone No 313-486-2908	Date (MM/DD/YY) 2015-05-17

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is 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.

When completed mail this report to: PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773 Page 1

## Michigan Department of Environmental Quality Daily Discharge Monitoring Report (DMR)

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust  
**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601  
**FACILITY:** RACER-Saginaw Nodular Indust  
**LOCATION:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601  
**PERMIT NUMBER:** MI0059042  
**DISTRICT:** Saginaw Bay  
**COUNTY:** Saginaw  
**MONITORING POINT:** 021A  
**MONITORING PERIOD :** 2015-04-01 To: 2015-04-30

PARAMETER NAME	Turbidity						
PARAMETER CODE	00070						
MONITORING PT.	021A						
STAGE CODE	1						
UNIT	nephelometric turbidity unit						
2015-04-01							
2015-04-02							
2015-04-03							
2015-04-04							
2015-04-05							
2015-04-06							
2015-04-07							
2015-04-08							
2015-04-09							
2015-04-10							
2015-04-11							
2015-04-12							
2015-04-13							
2015-04-14							
2015-04-15							
2015-04-16							
2015-04-17							
2015-04-18							
2015-04-19							
2015-04-20							
2015-04-21							
2015-04-22							
2015-04-23							
2015-04-24							
2015-04-25							
2015-04-26							
2015-04-27							
2015-04-28							
2015-04-29							
2015-04-30							
Name/Title of Principal Executive Officer Or Authorized Agent		I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is 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.			Signature of Principal Executive Officer Or Authorized Agent		Date (MM/DD/YY)
David Favero, Deputy Cleanup Manager, Michigan					David Favero		2015-05-17

When completed mail this report to: PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773 Page 2

## Michigan Department of Environmental Quality Daily Discharge Monitoring Report (DMR)

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust  
**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601  
**FACILITY:** RACER-Saginaw Nodular Indust  
**LOCATION:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601  
**PERMIT NUMBER:** MI0059042  
**DISTRICT:** Saginaw Bay  
**COUNTY:** Saginaw  
**MONITORING POINT:** 022A  
**MONITORING PERIOD :** 2015-04-01 To: 2015-04-30

PARAMETER NAME	Flow	Total Suspended Solids	pH	Turbidity			
PARAMETER CODE	50050	00530	00400	00070			
MONITORING PT.	022A	022A	022A	022A			
STAGE CODE	1	1	1	1			
UNIT	MGD	mg/l	S.U.	nephelometric turbidity unit			
2015-04-01							
2015-04-02							
2015-04-03							
2015-04-04							
2015-04-05							
2015-04-06							
2015-04-07							
2015-04-08							
2015-04-09							
2015-04-10	0.0091	< 4.0	7.84				
2015-04-11							
2015-04-12							
2015-04-13							
2015-04-14							
2015-04-15							
2015-04-16							
2015-04-17							
2015-04-18							
2015-04-19							
2015-04-20							
2015-04-21							
2015-04-22							
2015-04-23							
2015-04-24							
2015-04-25							
2015-04-26							
2015-04-27							
2015-04-28							
2015-04-29							
2015-04-30							
Name/Title of Principal Executive Officer Or Authorized Agent		Signature of Principal Executive Officer Or Authorized Agent			Telephone No	Date (MM/DD/YY)	
David Favero, Deputy Cleanup Manager, Michigan		David Favero			313-486-2908	2015-05-17	

When completed mail this report to: PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773 Page 3

**PARAMETER COMMENTS:**

Monitoring Point	Parameter Name	Parameter Code	Date	Stage	Unit	Comment
------------------	----------------	----------------	------	-------	------	---------

**Non-Numeric Code Legend (for daily data entry purpose)**

<b>*Y</b>	<b>Fecal Coliform (too numerous to count)</b>
-----------	---

**Stage Code Legend**

<b>1</b>	<b>Final Effluent</b>
----------	-----------------------

### Michigan Department of Environmental Quality Monthly Discharge Monitoring Report (DMR)

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust  
**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601  
**FACILITY:** RACER-Saginaw Nodular Indust  
**LOCATION:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601

**PERMIT NUMBER:** MI0059042  
**MONITORING POINT:** 021A

**DISTRICT:** Saginaw Bay  
**COUNTY:** Saginaw

**Monitoring Period :** 2015-04-01 To: 2015-04-30

**NO DISCHARGE FROM SITE: ( X )**

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
		Average	Maximum		Minimum	Average	Maximum				
Flow  PARAM CODE: 50050 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	MGD	*****	*****	*****	*****	0	*****	*****
	Permit Requirement	(report) Maximum Monthly Average	(report) Maximum Daily		*****	*****	*****		Weekly when Discharging	Recorded Daily Flow	
Total Suspended Solids  PARAM CODE: 00530 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****	mg/l	0	*****	*****
	Permit Requirement	*****	*****		*****	35 Maximum Monthly Average	70 Maximum Daily		Weekly when Discharging	3-Portion Composite	
Carbonaceous Biochemical Oxygen Demand (CBOD5)  PARAM CODE: 80082 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****	mg/l	0	*****	*****
	Permit Requirement	*****	*****		*****	*****	39 Maximum Daily		Daily when Discharging	Grab	
Ammonia Nitrogen (as N)  PARAM CODE: 00610 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****	mg/l	0	*****	*****
	Permit Requirement	*****	*****		*****	*****	(report) Maximum Daily		Weekly when Discharging	Grab	
Outfall Observation  PARAM CODE: 84130 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	yes/no	*****	*****	*****	*****	0	*****	*****
	Permit Requirement	(report) Yes/No	*****		*****	*****	*****		*****	Weekly when Discharging	Visual
pH  PARAM CODE: 00400 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****	S.U.	0	*****	*****
	Permit Requirement	*****	*****		6.5 Minimum Daily	*****	9.0 Maximum Daily		Daily when Discharging	Grab	
Dissolved Oxygen  PARAM CODE: 00300 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****	mg/l	0	*****	*****
	Permit Requirement	*****	*****		6.0 Minimum Daily	*****	*****		Daily when Discharging	Grab	
<b>Name/Title of Principal Executive Officer Or Authorized Agent</b> David Favero, Deputy Cleanup Manager, Michigan	I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, and complete. I am aware that					<b>Signature of Principal Executive Officer Or Authorized Agent</b>		<b>Telephone No</b>		<b>Date (MM/DD/YY)</b>	
						David Favero		313-486-2908		2015-05-14	

There are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

**When completed mail this report to:** PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 1

### Michigan Department of Environmental Quality Discharge Monitoring Report (DMR)

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust

**PERMIT NUMBER:** *MI0059042*
**DISTRICT:**

Saginaw Bay

**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
Saginaw, MI 48601

**MONITORING GROUP:** 021A

**COUNTY:**

Saginaw

**FACILITY:** RACER-Saginaw Nodular Indust

**LOCATION:** 2100 Veterans Memorial Parkway  
Saginaw, MI 48601

**Monitoring Period :** 2015-04-01 To: 2015-04-30
**NO DISCHARGE FROM SITE:**

( X )

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
		Average	Maximum		Minimum	Average	Maximum				
Turbidity	Sample Measurement	*****	*****	*****	*****	*****	*****	nephelometric turbidity unit	0	*****	*****
PARAM CODE: 00070 Mon. Site No.: 021A Stage Code: 1	Permit Requirement	*****	*****		*****	80 Maximum Monthly Average	160 Maximum Daily			Weekly when Discharging	Grab
Name/Title of Principal Executive Officer Or Authorized Agent	I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is 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.					Signature of Principal Executive Officer Or Authorized Agent		Telephone No		Date (MM/DD/YY)	
David Favero, Deputy Cleanup Manager, Michigan						David Favero		313-486-2908		2015-05-14	

**When completed mail this report to:** PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 2

### Michigan Department of Environmental Quality Discharge Monitoring Report (DMR)

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust

**PERMIT NUMBER:** MI0059042

**DISTRICT:**

Saginaw Bay

**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
Saginaw, MI 48601

**MONITORING GROUP:** 022A

**COUNTY:**

Saginaw

**FACILITY:** RACER-Saginaw Nodular Indust

**LOCATION:** 2100 Veterans Memorial Parkway  
Saginaw, MI 48601

**Monitoring Period :** 2015-04-01 To: 2015-04-30

**NO DISCHARGE FROM SITE:**

( )

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
		Average	Maximum		Minimum	Average	Maximum				
Flow	Sample Measurement	0.0091	0.0091	MGD	*****	*****	*****	*****	0	Weekly when Discharging	Recorded Daily Flow
PARAM CODE: 50050 Mon. Site No.: 022A Stage Code: 1	Permit Requirement	(report) Maximum Monthly Average	(report) Maximum Daily		*****	*****	*****			Weekly when Discharging	Recorded Daily Flow
Total Suspended Solids	Sample Measurement	*****	*****	*****	*****	4	4	mg/l	0	Weekly when Discharging	3-Portion Composite
PARAM CODE: 00530 Mon. Site No.: 022A Stage Code: 1	Permit Requirement	*****	*****		*****	35 Maximum Monthly Average	70 Maximum Daily			Weekly when Discharging	3-Portion Composite
pH	Sample Measurement	*****	*****	*****	7.84	*****	7.84	S.U.	0	Weekly when Discharging	Grab
PARAM CODE: 00400 Mon. Site No.: 022A Stage Code: 1	Permit Requirement	*****	*****		6.5 Minimum Daily	*****	9.0 Maximum Daily			Weekly when Discharging	Grab
Turbidity	Sample Measurement	*****	*****	*****	*****	*G	*G	nephelometric turbidity unit	0	Weekly when Discharging	Grab
PARAM CODE: 00070 Mon. Site No.: 022A Stage Code: 1	Permit Requirement	*****	*****		*****	80 Maximum Monthly Average	160 Maximum Daily			Weekly when Discharging	Grab
Name/Title of Principal Executive Officer Or Authorized Agent	I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is 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.					Signature of Principal Executive Officer Or Authorized Agent		Telephone No		Date (MM/DD/YY)	
David Favero, Deputy Cleanup Manager, Michigan						David Favero		313-486-2908		2015-05-14	

**When completed mail this report to:** PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 3



Non-Numeric Code Legend (for monthly data entry purpose)	
<b>*A</b>	<b>Sampling Equipment Failure</b>
<b>*B</b>	<b>Insufficient Flow for Sampling</b>
<b>*C</b>	<b>Laboratory Problem/Error</b>
<b>*D</b>	<b>Laboratory Results Not Received in Time for Report</b>
<b>*E</b>	<b>This Effluent Limit Not Applicable this Reporting Period</b>
<b>*F</b>	<b>No Operations this Reporting Period</b>
<b>*G</b>	<b>Monitoring is a Permit Condition/Not Required this Reporting Period</b>
<b>*Y</b>	<b>Fecal Coliform (too numerous to count)</b>
<b>*T</b>	<b>Alternative to TTO Monitoring</b>

Stage Code Legend	
<b>1</b>	<b>Final Effluent</b>

## Michigan Department of Environmental Quality Daily Discharge Monitoring Report (DMR)

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust  
**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601  
**FACILITY:** RACER-Saginaw Nodular Indust  
**LOCATION:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601

**PERMIT NUMBER:** MI0059042  
**DISTRICT:** Saginaw Bay  
**COUNTY:** Saginaw  
**MONITORING POINT:** 021A  
**MONITORING PERIOD :** 2015-06-01 To: 2015-06-30

PARAMETER NAME	Flow	Total Suspended Solids	Carbonaceous Biochemical Oxygen Demand (CBOD5)	Ammonia Nitrogen (as N)	Outfall Observation	pH	Dissolved Oxygen
PARAMETER CODE	50050	00530	80082	00610	84130	00400	00300
MONITORING PT.	021A	021A	021A	021A	021A	021A	021A
STAGE CODE	1	1	1	1	1	1	1
UNIT	MGD	mg/l	mg/l	mg/l	yes/no	S.U.	mg/l
2015-06-01							
2015-06-02							
2015-06-03							
2015-06-04							
2015-06-05							
2015-06-06							
2015-06-07							
2015-06-08							
2015-06-09							
2015-06-10							
2015-06-11							
2015-06-12							
2015-06-13							
2015-06-14							
2015-06-15							
2015-06-16							
2015-06-17							
2015-06-18							
2015-06-19							
2015-06-20							
2015-06-21							
2015-06-22							
2015-06-23							
2015-06-24							
2015-06-25							
2015-06-26							
2015-06-27							
2015-06-28							
2015-06-29							
2015-06-30							
Name/Title of Principal Executive Officer Or Authorized Agent David Favero, Deputy Michigan Cleanup Manager	I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is 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.				Signature of Principal Executive Officer Or Authorized Agent David Favero	Telephone No 313-486-2908	Date (MM/DD/YY) 2015-07-06

When completed mail this report to: PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 1

## Michigan Department of Environmental Quality Daily Discharge Monitoring Report (DMR)

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust  
**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601  
**FACILITY:** RACER-Saginaw Nodular Indust  
**LOCATION:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601

**PERMIT NUMBER:** MI0059042  
**DISTRICT:** Saginaw Bay  
**COUNTY:** Saginaw  
**MONITORING POINT:** 021A  
**MONITORING PERIOD :** 2015-06-01 To: 2015-06-30

PARAMETER NAME	Turbidity						
PARAMETER CODE	00070						
MONITORING PT.	021A						
STAGE CODE	1						
UNIT	nephelometric turbidity unit						
2015-06-01							
2015-06-02							
2015-06-03							
2015-06-04							
2015-06-05							
2015-06-06							
2015-06-07							
2015-06-08							
2015-06-09							
2015-06-10							
2015-06-11							
2015-06-12							
2015-06-13							
2015-06-14							
2015-06-15							
2015-06-16							
2015-06-17							
2015-06-18							
2015-06-19							
2015-06-20							
2015-06-21							
2015-06-22							
2015-06-23							
2015-06-24							
2015-06-25							
2015-06-26							
2015-06-27							
2015-06-28							
2015-06-29							
2015-06-30							
Name/Title of Principal Executive Officer Or Authorized Agent David Favero, Deputy Michigan Cleanup Manager	I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is 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.	Signature of Principal Executive Officer Or Authorized Agent David Favero	Telephone No 313-486-2908	Date (MM/DD/YY) 2015-07-06			

When completed mail this report to: PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 2

## Michigan Department of Environmental Quality Daily Discharge Monitoring Report (DMR)

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust  
**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601  
**FACILITY:** RACER-Saginaw Nodular Indust  
**LOCATION:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601  
**PERMIT NUMBER:** MI0059042  
**DISTRICT:** Saginaw Bay  
**COUNTY:** Saginaw  
**MONITORING POINT:** 022A  
**MONITORING PERIOD :** 2015-06-01 To: 2015-06-30

PARAMETER NAME	Flow	Total Suspended Solids	pH	Turbidity			
PARAMETER CODE	50050	00530	00400	00070			
MONITORING PT.	022A	022A	022A	022A			
STAGE CODE	1	1	1	1			
UNIT	MGD	mg/l	S.U.	nephelometric turbidity unit			
2015-06-01							
2015-06-02							
2015-06-03							
2015-06-04							
2015-06-05							
2015-06-06							
2015-06-07							
2015-06-08							
2015-06-09							
2015-06-10							
2015-06-11							
2015-06-12							
2015-06-13							
2015-06-14							
2015-06-15							
2015-06-16	0.0103	< 4.0	7.66				
2015-06-17							
2015-06-18							
2015-06-19							
2015-06-20							
2015-06-21							
2015-06-22							
2015-06-23							
2015-06-24							
2015-06-25							
2015-06-26							
2015-06-27							
2015-06-28							
2015-06-29							
2015-06-30							
Name/Title of Principal Executive Officer Or Authorized Agent	I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is 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.			Signature of Principal Executive Officer Or Authorized Agent	Telephone No	Date (MM/DD/YY)	
David Favero, Deputy Michigan Cleanup Manager				David Favero	313-486-2908	2015-07-06	

When completed mail this report to: PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 3

**PARAMETER COMMENTS:**

Monitoring Point	Parameter Name	Parameter Code	Date	Stage	Unit	Comment
------------------	----------------	----------------	------	-------	------	---------

**Non-Numeric Code Legend (for daily data entry purpose)**

*Y	Fecal Coliform (too numerous to count)
----	--

**Stage Code Legend**

1	Final Effluent
---	----------------

### Michigan Department of Environmental Quality Monthly Discharge Monitoring Report (DMR)

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust  
**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601  
**FACILITY:** RACER-Saginaw Nodular Indust  
**LOCATION:** 2100 Veterans Memorial Parkway  
 Saginaw, MI 48601

**PERMIT NUMBER:** MI0059042  
**MONITORING POINT:** 021A

**DISTRICT:** Saginaw Bay  
**COUNTY:** Saginaw

**Monitoring Period :** 2015-06-01 To: 2015-06-30

**NO DISCHARGE FROM SITE:** ( X )

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
		Average	Maximum		Minimum	Average	Maximum				
Flow  PARAM CODE: 50050 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	MGD	*****	*****	*****	*****	0	*****	*****
	Permit Requirement	(report) Maximum Monthly Average	(report) Maximum Daily		*****	*****	*****			Weekly when Discharging	Recorded Daily Flow
Total Suspended Solids  PARAM CODE: 00530 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****	mg/l	0	*****	*****
	Permit Requirement	*****	*****		*****	35 Maximum Monthly Average	70 Maximum Daily			Weekly when Discharging	3-Portion Composite
Carbonaceous Biochemical Oxygen Demand (CBOD5)  PARAM CODE: 80082 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****	mg/l	0	*****	*****
	Permit Requirement	*****	*****		*****	*****	7.2 Maximum Daily			Daily when Discharging	Grab
Ammonia Nitrogen (as N)  PARAM CODE: 00610 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****	mg/l	0	*****	*****
	Permit Requirement	*****	*****		*****	*****	2.5 Maximum Daily			Weekly when Discharging	Grab
Outfall Observation  PARAM CODE: 84130 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	yes/no	*****	*****	*****	*****	0	*****	*****
	Permit Requirement	(report) Yes/No	*****		*****	*****	*****		*****		Weekly when Discharging
pH  PARAM CODE: 00400 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****	S.U.	0	*****	*****
	Permit Requirement	*****	*****		*****	6.5 Minimum Daily	9.0 Maximum Daily			Daily when Discharging	Grab
Dissolved Oxygen  PARAM CODE: 00300 Mon. Site No.: 021A Stage Code: 1	Sample Measurement	*****	*****	*****	*****	*****	*****	mg/l	0	*****	*****
	Permit Requirement	*****	*****		*****	6.0 Minimum Daily	*****		*****		Daily when Discharging
<b>Name/Title of Principal Executive Officer Or Authorized Agent</b> David Favero, Deputy Michigan Cleanup Manager	I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, and complete. I am aware that					<b>Signature of Principal Executive Officer Or Authorized Agent</b>		<b>Telephone No</b>		<b>Date (MM/DD/YY)</b>	
						David Favero		313-486-2908		2015-07-06	

There are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

**When completed mail this report to:** PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 1

### Michigan Department of Environmental Quality Discharge Monitoring Report (DMR)

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust

**PERMIT NUMBER:** *MI0059042*
**DISTRICT:**

Saginaw Bay

**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
Saginaw, MI 48601

**MONITORING GROUP:** 021A

**COUNTY:**

Saginaw

**FACILITY:** RACER-Saginaw Nodular Indust

**LOCATION:** 2100 Veterans Memorial Parkway  
Saginaw, MI 48601

**Monitoring Period :** 2015-06-01 To: 2015-06-30
**NO DISCHARGE FROM SITE:**

( X )

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
		Average	Maximum		Minimum	Average	Maximum				
Turbidity	Sample Measurement	*****	*****	*****	*****	*****	*****	nephelometric turbidity unit	0	*****	*****
PARAM CODE: 00070 Mon. Site No.: 021A Stage Code: 1	Permit Requirement	*****	*****		*****	80 Maximum Monthly Average	160 Maximum Daily			Weekly when Discharging	Grab
Name/Title of Principal Executive Officer Or Authorized Agent	I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is 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.					Signature of Principal Executive Officer Or Authorized Agent		Telephone No		Date (MM/DD/YY)	
David Favero, Deputy Michigan Cleanup Manager						David Favero		313-486-2908		2015-07-06	

**When completed mail this report to:** PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 2



### Michigan Department of Environmental Quality Discharge Monitoring Report (DMR)

**PERMITTEE NAME:** RACER-Saginaw Nodular Indust

**PERMIT NUMBER:** MI0059042

**DISTRICT:**

Saginaw Bay

**MAILING ADDRESS:** 2100 Veterans Memorial Parkway  
Saginaw, MI 48601

**MONITORING GROUP:** 022A

**COUNTY:**

Saginaw

**FACILITY:** RACER-Saginaw Nodular Indust

**LOCATION:** 2100 Veterans Memorial Parkway  
Saginaw, MI 48601

**Monitoring Period :** 2015-06-01 To: 2015-06-30

**NO DISCHARGE FROM SITE:**

( )

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type	
		Average	Maximum		Minimum	Average	Maximum					
Flow	Sample Measurement	0.0103	0.0103	MGD	*****	*****	*****	*****	0	Weekly when Discharging	Recorded Daily Flow	
PARAM CODE: 50050 Mon. Site No.: 022A Stage Code: 1	Permit Requirement	(report) Maximum Monthly Average	(report) Maximum Daily		*****	*****	*****			Weekly when Discharging	Recorded Daily Flow	
Total Suspended Solids	Sample Measurement	*****	*****	*****	*****	4	4	mg/l	0	Weekly when Discharging	3-Portion Composite	
PARAM CODE: 00530 Mon. Site No.: 022A Stage Code: 1	Permit Requirement	*****	*****		*****	35 Maximum Monthly Average	70 Maximum Daily			Weekly when Discharging	3-Portion Composite	
pH	Sample Measurement	*****	*****	*****	7.66	*****	7.66	S.U.	0	Weekly when Discharging	Grab	
PARAM CODE: 00400 Mon. Site No.: 022A Stage Code: 1	Permit Requirement	*****	*****		6.5 Minimum Daily	*****	9.0 Maximum Daily			Weekly when Discharging	Grab	
Turbidity	Sample Measurement	*****	*****	*****	*****	*G	*G	nephelometric turbidity unit	0	Weekly when Discharging	Grab	
PARAM CODE: 00070 Mon. Site No.: 022A Stage Code: 1	Permit Requirement	*****	*****		*****	80 Maximum Monthly Average	160 Maximum Daily			Weekly when Discharging	Grab	
Name/Title of Principal Executive Officer Or Authorized Agent		I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is 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.					Signature of Principal Executive Officer Or Authorized Agent		Telephone No		Date (MM/DD/YY)	
David Favero, Deputy Michigan Cleanup Manager							David Favero		313-486-2908		2015-07-06	

**When completed mail this report to:** PCS-Data Entry, MDEQ-WD, P.O. Box 30273, Lansing, MI, 48909-7773

Page 3

**GENERAL REPORT COMMENT:**

No discharge through outfall 021A this month.

<b>Non-Numeric Code Legend (for monthly data entry purpose)</b>	
<b>*A</b>	<b>Sampling Equipment Failure</b>
<b>*B</b>	<b>Insufficient Flow for Sampling</b>
<b>*C</b>	<b>Laboratory Problem/Error</b>
<b>*D</b>	<b>Laboratory Results Not Received in Time for Report</b>
<b>*E</b>	<b>This Effluent Limit Not Applicable this Reporting Period</b>
<b>*F</b>	<b>No Operations this Reporting Period</b>
<b>*G</b>	<b>Monitoring is a Permit Condition/Not Required this Reporting Period</b>
<b>*Y</b>	<b>Fecal Coliform (too numerous to count)</b>
<b>*T</b>	<b>Alternative to TTO Monitoring</b>

<b>Stage Code Legend</b>	
<b>1</b>	<b>Final Effluent</b>