



**CONESTOGA-ROVERS
& ASSOCIATES**

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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: Fourth Quarter 2012 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 fourth quarter of 2013 (October 1, 2012 through December 31, 2012).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

JEP/kf/11

Encl. Attachment A - Fourth Quarter 2012 Progress Report

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

ATTACHMENT A

FOURTH QUARTER 2012 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
FORMER SAGINAW NODULAR IRON, SAGINAW, MI
OCTOBER 1, 2012 TO DECEMBER 31, 2012

WORK PERFORMED THIS QUARTER

The following work was performed during the fourth quarter at the Nodular facility:

- Preparation and submittal of the third quarter progress report for 2012 on October 9, 2012
- Preparation of 2013 budget request
- Reviewed bids and selected contractors to complete Primary Settling Basin Stabilization work and work associated with drainage improvements on the Saginaw Nodular Industrial Land
- Conducted the annual Environmental Indicator (EI) sampling event the week of November 5, 2012
- Preparation and submittal of Storm Water Pollution Prevention Plan (SWPPP) to the MDEQ on November 13, 2012
- Contractor initiated work on the Primary Settling Basin Stabilization the week of November 12, 2012. At the end of the quarter, the majority of the classified sand pile has been moved and placed in the primary settling basins. Primary settling basins 1 and 2 have been filled, with the exception of the 2-ft of clay to be placed on top, primary settling basin 3 is 2/3 full, and primary settling basin 4 is 3/4 full.
- Periodic inspections for SWPPP and level measurements of secondary pond

DATA AVAILABLE DURING THIS QUARTER

- Samples were collected for the EI sampling and will be transmitted to U.S. EPA under separate cover.

PROBLEMS ENCOUNTERED

- None.

SUMMARY OF PROBLEM RESOLUTION

- Not applicable

POTENTIAL PROBLEMS

- 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 <ul style="list-style-type: none">• 3-years of EI sampling complete• 2011 EI sampling and reporting completed April 18, 2012• 2012 EI sampling completed the week of November 5, 2012	25%

<u>Task</u>	<u>Estimated % Complete</u>
2. IU H - WWTP Closure <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 initiated • Developing options for addressing the North Ditch 	20%
3. IU I- Area Closure	0%
4. IU I - Staging Area OM&M	0%
5. Other - RCRA Corrective Action Reporting and Other Related Reporting <ul style="list-style-type: none"> • Submitted CCR documentation to U.S. EPA on November 18, 2011 • Submitted 2011 EI letter to U.S. EPA on April 18, 2012 • Submitted Supplemental RFI Report on September 28, 2012 	50%

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

- Complete stabilization of the primary settling basins and related drainage improvements
- Meeting with EPA to discuss Supplemental RFI Report
- Begin preparation of CMS/CMP report
- Begin preparation of Deed Restrictions
- Continue evaluation of options to address the North Ditch
- Submit report summarizing the results of the 2012 EI monitoring event