



**CONESTOGA-ROVERS
& ASSOCIATES**

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April 11, 2014

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: First Quarter 2014 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 first quarter of 2014 (January 1, 2014 through March 31, 2014).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

JEP/ac/19

Encl. Attachment A – First Quarter 2014 Progress Report

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

Attachment A

**First Quarter 2014 Progress Report
Performance-Based Administrative Order on Consent
Former Saginaw Nodular Iron, Saginaw, MI
January 1, 2014 to March 31, 2014**

ATTACHMENT A

Work Performed this Quarter

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

- Completed annual SWPPP review form and submitted to MDEQ on January 6, 2014
- Prepared and submitted the fourth quarter progress report for 2013 on January 13, 2014
- Prepared and submitted the 2013 CA 750 EI annual monitoring results to U.S. EPA on February 13, 2014
- Prepared and submitted the Stabilization Alternative Evaluation and Recommendation for the North Ditch to U.S. EPA on February 26, 2014
- Initiated dialogue with potential permitting agencies for the proposed North Ditch work including the MDEQ and U.S. Army Corp. of Engineers
- 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

- None

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	
<u>Annual EI Sampling (3-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 by 2016)	60%
<ul style="list-style-type: none">• 2011 EI sampling was completed in November 2011 and reporting	

<u>Task</u>	<u>Estimated % Complete</u>
<p>was submitted to U.S. EPA April 18, 2012</p> <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 • 2013 EI Sampling was completed in November 2013 and reporting was submitted to U.S. EPA February 13, 2014 	
<p>2. IU H – WWTP CLOSURE</p> <p><u>Secondary Pond</u></p> <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 • Discharge of water under NPDES permit to maintain freeboard in the secondary pond until October 2016 when the NPDES permit expires. At that time, RACER and MDEQ will evaluate whether sampling is still necessary for the outfall or whether uncontrolled discharge from the secondary pond is acceptable. 	65%
<p><u>Primary Basins</u></p> <ul style="list-style-type: none"> • 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 • Primary settling basin stabilization work was completed June 20, 2013. A construction completion report was submitted to U.S. EPA on September 4, 2013 	100%
<p><u>North Ditch</u></p> <ul style="list-style-type: none"> • 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 • 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 • Stabilization Alternative Evaluation and Recommendation for the North Ditch was submitted to U.S. EPA on February 26, 2014 • Obtain necessary permits to perform work • Implement approved plan 	30%

<u>Task</u>	<u>Estimated % Complete</u>
3. IU I- Area Closure <u>Classified Sand Pile</u>	100%
<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	NA
<ul style="list-style-type: none"> No activities are proposed at this time 	
5. OTHER – RCRA CORRECTIVE ACTION REPORTING AND OTHER RELATED REPORTING	
<u>Budgeting</u>	On-going
<ul style="list-style-type: none"> EPA approved the 2012 EA Budget Authorization Request on December 22, 2011 EPA approved the 2012 Annual EA Budget Amendment No. 1 on September 19, 2012 EPA approved the 2013 EA Budget Authorization Request on January 3, 2013 EPA approved the 2014 EA Budget Authorization Request on November 22, 2013 	
<u>RCRA Corrective Action Reporting</u>	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 Prepare response to comments from U.S. EPA on the Supplemental RFI and CMP Prepare Declaration of Restrictive Covenant Prepare Corrective Measures Implementation Plan Prepare Final Remedy Construction Completion Report 	
<u>Other Related Reporting</u>	
<ul style="list-style-type: none"> DEQ issued NPDES permit for the Site on August 24, 2012 Submit monthly DMRs 	100%
	On-going

Summary of Contacts with Interested Parties

- None

Projected Work for Next Reporting Period

- Schedule pre-consultation meeting with the MDEQ to discuss permitting requirements for the work proposed in the North Ditch
- Meet with U.S. EPA to discuss and/or prepare responses to U.S. EPA comments on the proposed alternative for stabilizing 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 Declaration of Restrictive Covenant
- Complete periodic inspections per the SWPPP and level measurements of secondary pond
- Perform discharge event from secondary pond if necessary