



**CONESTOGA-ROVERS
& ASSOCIATES**

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July 13, 2012

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

RE: Second 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

Dear Mr. Nemani:

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 second quarter of 2012 (April 1, 2012 through June 30, 2011).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

JEP/kf/9

Encl. Attachment A - Second 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

SECOND QUARTER 2012 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
FORMER SAGINAW NODULAR IRON, SAGINAW, MI
APRIL 1, 2012 TO JUNE 30, 2012

WORK PERFORMED THIS QUARTER

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

- Preparation and submittal of the first quarter progress report for 2012 on April 16
- Collected periodic ammonia readings from secondary pond
- On-going correspondence with the MDEQ regarding the NPDES permit application
- Began evaluation of alternatives for resolving issues in the North Ditch
- Preparation for and participation in project status update meeting with U.S. EPA on May 10, 2012
- Preparation for and participation in conference call with MDEQ on May 11, 2012 to discuss the NPDES permit, Findley Road Sump and work on the primary settling basins
- Conducted third discharge event from secondary pond on May 16/17, 2012
- GM LLC cleaned out primary lagoons #3 and #4
- Preparation and submittal of budget amendment for primary lagoon work on June 11, 2012
- Began preparation of bid documents and stabilization work plan for primary lagoon work
- Periodic inspections and level measurements of secondary pond

DATA AVAILABLE DURING THIS QUARTER

- Analytical results for composite discharge sample (secondary pond) collected on March 29, 2012 were submitted to MDEQ and U.S. EPA on April 16, 2012 via email
- Preparation and submittal of 2011 EI sample results to U.S. EPA on April 18, 2012 via email
- Analytical results for sample collected from the Findley Road Sump on April 5, 2012 were submitted to the MDEQ on May 8, 2012 via email.
- Analytical results for composite discharge sample (secondary pond) collected on May 17, 2012 were submitted to the MDEQ and U.S. EPA on June 1, 2012 via email.

PROBLEMS ENCOUNTERED

- Water ponding on road near Findley Road sump that is non-operational.

SUMMARY OF PROBLEM RESOLUTION

- A representative sample of the Findley road sump water was collected for characterization. GM built up the roadway and are continuing to use it.

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 - 3-years of EI sampling complete - 2011 EI sampling and reporting - 2012 EI sampling event scheduled for November	10%
2. IU H - WWTP Closure - Characterization Study on Secondary Pond complete - Emergency overflow for secondary pond installed - Draft of bid documents and stabilization work plan for primary lagoon undergoing final internal review - Developing options for addressing the North Ditch	10%
3. IU I- Area Closure	0%
4. IU I - Staging Area OM&M	0%
5. Other - RCRA Corrective Action Reporting and Other Related Reporting - Supplemental RFI Report	10%

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

- Submit stabilization work plan for and begin closure of the primary settling basins
- Begin preparation of Supplemental RFI Report
- Begin preparation of CMS/CMP report
- Begin preparation of Deed Restrictions
- Continue evaluation of North Ditch closure method in consultation with U.S. EPA