



January 11, 2016

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 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 fourth quarter of 2015 (October 1, 2015 through December 31, 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 "John-Eric Pardys". The signature is fluid and cursive, written over a light blue horizontal line.

John-Eric Pardys, P.Eng.

JEP/kf/29

Encl. Attachment A – Fourth 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, GHD (via e-mail)

Attachment A  
Fourth Quarter 2015 Progress Report  
Performance-Based Administrative  
Order on Consent  
Former Saginaw Nodular Iron, Saginaw, MI  
October 1, 2015 to December 31, 2015

## **Attachment A**

### **Work Performed this Quarter**

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

- Prepared and submitted the third quarter progress report for 2015 on October 14, 2015.
- Prepared and submitted proposed scope of work to U.S. EPA on July 15, 2015 to delineate PCB impacts above 10 mg/kg in IU G, which was subsequently approved by U.S. EPA on July 30, 2015. Conducted additional delineation of PCB impacts above 10 mg/kg on August 19, 2015.
- Participated in Site update meeting with U.S. EPA on October 14, 2015.
- Received MDEQ permit for the proposed North Ditch work on August 19, 2015. Continued efforts to obtain necessary approvals from adjacent property owners to complete the North Ditch work.
- Finalized and submitted 2016 budget request to U.S. EPA and MDEQ.
- Continued evaluation of existing data to determine if further investigation is necessary to support selection of corrective measures.
- Conducted annual EI sampling event the week of November 2, 2015.
- Conducted survey of the western portion of the secondary pond and lagoon #5 in October 2015 to evaluate potential re-use options.
- Submitted monthly electronic discharge monitoring reports for NPDES permit.
- Began preparing an update to Corrective Measures Proposal.
- Completed periodic inspections for SWPPP and collected level measurements of secondary pond and North Ditch.

### **Data Available During this Quarter**

Annual EI monitoring results to be submitted under separate cover.

### **Problems Encountered**

None.

### **Summary of Problem Resolution**

None.

## Attachment A

### 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 (4-years completed to date by RACER, 2-years completed by MLC, and 3-years completed by GMC) (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)</u>  | 80%                         |
| <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><li>• 2015 EI sampling was completed in November 2015 and reporting will be submitted to U.S. EPA in Q1-2016.</li></ul>   |                             |
| <u>Additional delineation of impacts in soil</u>  |                             |
| <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>• Work plan for additional delineation of PCB impacts in soil above 10 mg/kg in the south portion of IU G submitted to U.S. EPA on July 15, 2015 and approved by U.S. EPA on July 30, 2015.</li><li>• Additional delineation of PCB impacts above 10 mg/kg was completed in August 2015. A summary of the investigation is being prepared.</li><li>• Review available data to evaluate if additional delineation is necessary for impacted soil at the overall Site.</li></ul> |                             |

**Attachment A**

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| <u><b>Task</b></u>  | <u><b>Estimated<br/>% Complete</b></u> |
|---|--|
| <hr/>   |  |
| <u>Ammonia concentrations above MDEQ Groundwater Surface Water Interface Criteria</u>   |  |
| <ul style="list-style-type: none"><li>• Ammonia in groundwater evaluation was submitted to U.S. EPA on April 6, 2015 and to MDEQ on April 8, 2015.</li></ul>  |  |
| <hr/>   |  |
| 2. IU H – WWTP CLOSURE  |  |
| <u>Secondary Pond</u>   | 75%                                    |
| <ul style="list-style-type: none"><li>• Characterization Study on Secondary Pond completed in June of 2011.</li><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> |  |
| <hr/>   |  |
| <u>Primary Basins</u>   | 100%                                   |
| <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>  |  |

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## Attachment A

| <u>Task</u>   | <u>Estimated<br/>% Complete</u> |
|---|---------------------------------|
| <p><u>North Ditch</u></p> <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/agreements to perform work               <ul style="list-style-type: none"> <li>– Joint permit was received on August 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> <li>– Other agreements: access from adjacent property owners.</li> </ul> </li> <li>• Implement approved plan</li> </ul> | 45%                             |
| <p>3. IU I- AREA CLOSURE</p> <p><u>Classified Sand Pile</u></p> <ul style="list-style-type: none"> <li>• Removed all classified sand pile as part of the primary basin stabilization work.</li> <li>• Review available data to evaluate if additional characterization is necessary for impacted soil.</li> </ul>   | 75%                             |
| <p>4. IU I – STAGING AREA OM&amp;M</p> <ul style="list-style-type: none"> <li>• No activities proposed or pending at this time.</li> </ul>  | NA                              |
| <p>5. OTHER – RCRA CORRECTIVE ACTION REPORTING AND OTHER RELATED REPORTING</p> <p><u>Budget Process</u></p> <ul style="list-style-type: none"> <li>• U.S. EPA approved the 2012 EA Budget Authorization Request on December 22, 2011.</li> </ul>  | On-going                        |

## Attachment A

| <u>Task</u>  | <u>Estimated<br/>% Complete</u> |
|--|---------------------------------|
| <ul style="list-style-type: none"> <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> <li>• U.S. EPA approved the 2016 EA Budget Authorization Request on November 20, 2015.</li> </ul>  |                                 |
| 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 – Submit revised Corrective Measures Proposal – TBD.</li> <li>• Submitted Summary of WMU status to U.S. EPA on January 22, 2015 and to MDEQ on January 26, 2015.</li> <li>• Prepared response to comments from U.S. EPA on the Supplemental RFI and CMP – To be determined (TBD).</li> <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>   | 100%<br>On-going                |

### 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. There were discussions with a potential

## **Attachment A**

buyer for a portion of the Site and with MDEQ and U.S. EPA with respect to possible wetlands in the portion of the Site being considered for purchase.

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

- Submit the annual 2015 EI sampling results.
- Prepare NPDES permit renewal application.
- 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 authorizations to complete the North Ditch work and prepare bid documents.
- 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).