Compliance File

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

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July 23, 1993

TO: Margie Ring, Marquette District Office, WMD

FROM: Jan Sealock, Environmental Quality Analyst, WMD

SUBJECT: Grede Foundries, Inc.
Results of TET Monitoring Program
MID 006 131 890

I have reviewed the results of the TET Monitoring Program at Grede Foundries, Inc. of Kingsford, Michigan. Grede has proposed to change the current monthly monitoring program for cadmium and lead to a quarterly program. They have also proposed to use either TCLP or the EP Tox methodology instead of both for analysis of the parameters. I have discussed these proposals with Kim Paksi and the following monitoring program can be approved.

Grede will need to determine the mean plus three standard deviations of all the TCLP data collected to this point. It has been agreed to allow the facility to sample quarterly and analyze using only the TCLP test as long as the results of each quarterly sampling event are within the established mean plus three standard deviations which has been established.

If a quarterly analytical result is outside this range, the company will have to begin sampling the material on a monthly basis for the next three months. If the results of all three monthly samples have dropped back into the mean plus three standard deviations range for the particular parameter of concern (either lead or cadmium), the company may switch back to a quarterly sampling program. If the three monthly results continue to show that the treated material is out of the established concentration range, Grede must continue sampling monthly for one year.

After every year of monthly or quarterly sampling, Grede will need to add these results to the established data base and recalculate the mean plus three standard deviations for lead and cadmium for future comparisons.

If you have any questions regarding this proposal, please contact me at 517-373-4740.

cc: Ms. Kim Paksi, DNR
Ms. De Montgomery, DNR
HWP/C&E File

Jan Sealock

R 1030

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

March 3, 1992

TO: Phil Schrantz, Environmental Quality Analyst
Compliance and Enforcement Section
Waste Management Division

FROM: Jan Sealock, Environmental Quality Analyst
Hazardous Waste Permits Section
Waste Management Division

SUBJECT: Grede Foundries, Inc.
MID 006 131 890

I have reviewed the February 12, 1992, submittal from Grede Foundries, Inc. regarding the Proposed TET Process Monitoring Program. As you recall, the only deficiency found in my October 15, 1991, memo was that the facility needed to conduct both TCLP and EP-Tox analyses. The facility has now upgraded this monitoring program to include both analyses. The plan is now adequate and the program may be implemented.

If there are any questions, please contact me at 3-4740.

cc: Mr. Hank Switzer, DNR
Ms. De Montgomery, DNR/EPA Reporting
HWP/C&E File

Jan Sealock

RECYCLED PAPER

Grede Foundries - Kingsford

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

October 15, 1991

To: Phil Schrantz, Environmental Quality Analyst, WMD

From: Jan Sealock, Environmental Quality Analyst, WMD J.S.

Subject: Grede Foundries, Inc. MID 006 131 890

I have reviewed the Proposed TET Proposed Monitoring Program. After consulting with Kim Paksi, Liz Browne and reviewing the Consent Judgement, I have found the Program must be revised to include the following deficiency:

1). It was mentioned in the Proposed TET Proposed Monitoring Program on page 3, that TCLP will be the procedure to analyze lead and cadmium. Since TCLP has not been adopted by Act 64, we can not accept the TCLP method as a single source verification. Both TCLP and EP-Tox analyses must be conducted. It was found in the analytical results for lead that in some cases EP-Tox was the more sensitive procedure.

Once this has been revised, the Program meets all the specified details including:

a). Sampling methods and frequency.
b). Parameters to be monitored.
c). Analytical methods to be employed.
d). Analytical detection limits for each parameter.
e). Statistical data evaluation methods.
f). Procedures for the timely detection of, and response to, failure of the TET Process to render the baghouse dust wastes non-hazardous.

If you should have any questions, please call me at 3-4740.

cc: De Montgomery ✓