



October 16, 2015

Transmitted via E-mail

Mr. Chris Black
U.S. Environmental Protection Agency, Region 5
Land and Chemicals Division
77 West Jackson Blvd., DE-9J
Chicago, IL 60604-3590

**Re: Semi-Annual Progress Report (April 2015 through September 2015)
RCRA Corrective Action Performance-Based Voluntary Agreement
Van Buren Landfill, Van Buren, Michigan**

Dear Mr. Black:

In accordance with paragraph V.4.b. of the Performance-Based Voluntary Agreement (PVA), between the U.S. Environmental Protection Agency Region 5 (USEPA) and the Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for April 1, 2015 through September 30, 2015. The Mannik & Smith Group, Inc. is submitting the attached progress report on behalf of RACER.

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

Sincerely,

A handwritten signature in blue ink that reads 'Francis J. Biehl'.

Francis J. Biehl, PE
Project Manager

Attachment A – Semi-Annual Progress Report (April 2015 – September 2015)

Cc: David Favero, RACER
Grant Trigger, RACER

ATTACHMENT A
SEMI-ANNUAL PROGRESS REPORT
PERFORMANCE-BASED VOLUNTARY AGREEMENT
VAN BUREN TOWNSHIP LANDFILL, VAN BUREN, MICHIGAN
April 1, 2015 to September 30, 2015

WORK PERFORMED THIS PERIOD

- Prepared and submitted the Environmental Indicator CA750 Report to the USEPA– June 30, 2015
- Conference Call with the USEPA to review and discuss the results of the Draft BERA – June 10, 2015
- Prepared and submitted the draft BERA Steps 5 through 8 – June 18, 2015
- Conducted ground water sampling and analysis of the additional permanent monitoring wells MW-31 through MW-33 (GM property) and MW-34 (background monitoring well northwest of the Site) installed during the Phase IV activities – June 2015 (report submitted September 2, 2015)
- Prepared the Corrective Measures Study (submitted to the USEPA on October 2, 2015) – April thru September, 2015
- Working with the Wayne County Airport Authority (WCAA) to finalize an access agreement that allows for monitoring wells to be installed on WCAA property (i.e. the Willow Run Airport) located south of the Site. Solicited assistance from the USEPA (via a 7/16/15 e-mail letter from Christopher Black of the USEPA to David Favero of RACER Trust) in support of the proposed monitoring wells on the Willow Run Airport property.
- Support and negotiation efforts associated with 36-inch Spectra-DTE-Nexus (Nexus) gas pipeline currently being proposed to traverse through the RACER Trust (RACER) Van Buren Landfill Site.
- Technical action items: data reviews and progress reporting – ongoing

NEW DATA AVAILABLE THIS PERIOD

- Soil and ground water samples were collected by MSG, as discussed above. Laboratory analytical data was received and included in the Phase IV Investigation Report specific to the General Motors site, submitted September 2, 2015.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

Slow response to request for site access to the Willow Run Airport property, in support of the Phase IV Investigation delineation of ground water impacts efforts on the south side of Van Buren Landfill. Follow-up negotiations with Willow Run Airport are ongoing.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- | | |
|--|------|
| • Current Conditions Report | 100% |
| CRA submitted Draft Report to the USEPA - October 2011 | |
| Approved by USEPA during a conference call - November 21, 2011 | |
| • Performance-Based Administrative Order on Consent | 100% |
| Effective September 29, 2011 | |

Site Characterization SAP & QAPP Submitted by CRA to USEPA on February 17, 2012 Approved by the USEPA on June 4, 2012	100%
Consultant Selection Distributed Request for Proposal to several Consultants on February 24, 2012 and proposals were received on March 15, 2012. Signed Agreement for Environmental Consulting with MSG on June 19, 2012	100%
Clearing and Grubbing for Site Characterization Activities (Phase Ia) Completed from July 5 through July 16, 2012 and from July 23 through July 27, 2012	100%
Site Characterization Fieldwork (Phase Ia) From July 5 through September 25, 2012	100%
Site Characterization Data Report (Phase Ia), including proposed Phase Ib Sampling Matrix Final version addressing USEPA comments (February 7, 2013) submitted on February 19, 2013 Proposed Phase Ib Sampling Matrix approved by USEPA on February 7, 2013	100%
Clearing and Grubbing for Site Characterization Activities (Phase Ib) Completed March 25, 2013	100%
Site Characterization Fieldwork (Phase Ib) Completed from March 25, 2013 to April 4, 2013	100%
Human Health EI (CA725) Report (submitted June 28, 2013)	100%
Site Characterization Phase Ib Data Report Including proposed delineation investigation phase II (submitted October 7, 2013) Phase II Site Investigation scope approved by USEPA on November 22, 2013 via e-mail	100%
Phase II Site Investigation Field Work Completed from December 3 through December 23, 2013	100%
Phase II Site Investigation Report Including proposed Phase III delineation of off-site groundwater impacts and benzene impacts (submitted March 12, 2014) Phase III Site Investigation scope approved by USEPA on March 18, 2014 via e-mail	100%
Phase III Site Investigation Field Work Completed from April 1 through April 30, 2014	100%
Phase III Site Investigation Report Including proposed delineation investigation Phase IV (submitted September 4, 2014)	100%
Phase IV Site Investigation Field Work In Progress (Completion TBD, approximately February 2016)	75%
Phase IV Site Investigation Report To also include groundwater monitoring results (Completion TBD, approximately March 2016)	75%

- Ecological Risk Assessment (Anchor QEA with MSG support), steps 1 to 4 (Draft submitted September 8, 2014) 100%
- Ecological Risk Assessment (Anchor QEA, with MSG support), steps 5 to 8 (Draft submitted June 18, 2015) 100%
- RFI Summary Report (included as part of Draft CMS submitted October 2, 2015) 100%
- Contaminated Groundwater Migration under Control EI (CA750) (Draft Submitted June 30, 2015) 100%
- Corrective Measures Proposal (Draft Submitted October 2, 2015) 100%

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Schedule work upon obtaining access agreement with Willow Run Airport for proposed soil borings/monitoring wells (Phase IV) – January 2016
- Complete Phase IV Site Investigation activities – February 2016 (depends on obtaining off-site access)
- Perform groundwater sampling and analysis for all permanent monitoring wells – October/November 2015
- Prepare and submit Phase IV and groundwater monitoring report –February 2016
- Complete potential additional investigation measures requested by USEPA in support of the BERA and CMS, if any –October 2015 – March 2016
- Prepare summaries of meetings, data reviews, or conference calls with USEPA - as appropriate
- Prepare the Semi-Annual Progress Report for October 1, 2015 through March 31, 2016 - April 2016