

Transmitted via E-mail

Mr. Nate Nemani
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ENVIRONMENT

Subject:

Performance Based Administrative Order on Consent, Docket No. RCRA-5-2011-0019
Semi-Annual Progress Report, July 2016 – December 2016
RACER Trust Pontiac North Campus Site 11970 - MID 005 356 886
Pontiac, Michigan

Date:

January 16, 2017

Contact:

Christi Kiker

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Our ref:

B0064607.2016

Dear Mr. Nemani:

This progress report has been prepared in accordance with Section VI (24b) of the Administrative Order of Consent (Docket Number RCRA-05-2011-0019) entered into by the Revitalizing Auto Communities Environmental Response Trust (RACER Trust) and the United States Environmental Protection Agency (USEPA) for the above referenced Site. The following summarizes the work performed, data collected, estimated percent complete, project schedule, and problems encountered for the period from July 1, 2016 through December 31, 2016 for the portions of the Pontiac North Campus (PNC or the Site) for which RACER Trust is responsible for remediation.

Work Performed from July 1, 2016 through December 31, 2016

- Submitted Semi-Annual Progress Report to USEPA on July 15.
- Submitted Draft Budget Amendment No. 1 to USEPA on Aug 8. Received approval from USEPA on Sept 9.

- Submitted 2017 Budget Authorization Request to USEPA on Oct 28. Received approval from USEPA on Nov 22.
- Submitted the Draft Supplemental Characterization Summary Report to USEPA on July 21. Received comments from USEPA on Sept 13. Submitted Response to Comments to USEPA on Sept 23.
- Completed and submitted Draft Supplemental Soil Gas Data Evaluation Memo to USEPA on Sept 1.
- Conducted fluid level measurements of the PCB delineation temporary wells on Aug 1 thru 3.
- Conducted annual groundwater sampling on Sept 19 through 22. Submitted report to USEPA on Dec 29.
- Conducted supplemental site characterization field work (1,4-D, VOC analysis) the week of Sept 19 in conjunction with the annual groundwater monitoring event.
- Attended City of Pontiac meeting to discuss Duck Pond and Montcalm Seep status and next steps on Oct 6.
- Completed inspection of the existing soil cap on Oct 28. Inspection records are filed internally.
- Submitted the Work Plan to Investigate the Presence of 1,4-Dioxane, RACER Pontiac North Campus Site, Pontiac, Michigan to USEPA on Nov 21. Received approval from USEPA on Nov 25.
- Conducted 1,4 Dioxane field event from Nov 28 thru Dec 22.
- Submitted Draft CA 725 and CA 750 documents for Fiero (MID 005356910) to USEPA on Dec 22.
- Continued revision/update of the Draft Corrective Measures Study.
- Continued development of Montcalm Seep IM Work Plan, focusing on phytoremediation and regrading of the seep area to maximize planting area.
- Conducted waste characterization sampling activities (soil and ponded water) at the retention basin on Sept 23 and Oct 5 to aid in the development of a budget estimate for cleaning of the retention basin.
- Continued support for property transactions.

Data Collected

Data collected is identified in the above Work Performed section. Results will be included in separate data report submittals.

Estimated Percent Complete

Project Management

Ongoing

Corrective Action – General

- Current Conditions Report submitted to USEPA (11/25/11) 100%
- 2012 Budget Authorization submitted to USEPA (12/9/11) 100%
- Environmental Indicators Report submitted to USEPA (12/29/11) 100%
- 2012 Budget Amendment 1 approved (2/10/12) 100%
- Draft RFI Report submitted to USEPA (7/9/12) 100%
- 2012 Budget Amendment 2 approved (9/19/12) 100%
- 2012 Budget Amendment 3 approved (9/19/12) 100%
- 2013 Budget Authorization approved (1/25/13) 100%
- Draft CMP Report submitted to USEPA (3/15/13) 100%
- 2013 Budget Amendment 1 approved (7/18/13) 100%
- 2013 Budget Amendment 2 approved (11/12/13) 100%
- 2014 Budget Authorization approved (11/20/13) 100%
- 2014 Budget Amendment 1 approved (5/23/14) 100%
- 2015 Budget Authorization approved (11/20/14) 100%
- Fiero Focused CMS approved by USEPA (7/1/15) 100%
- Draft Fiero CMI Work Plan (10/7/15) 99%
- 2016 Budget Authorization approved (11/20/15) 100%
- 2016 Budget Amendment 1 approved (9/9/16) 100%
- 2017 Budget Authorization approved (11/22/16) 100%
- Draft Fiero CA 725 and CA 750 submitted to USEPA (12/22/16) 100%
- Revised Draft PNC CMS submittal to USEPA (submittal estimated July 2017) 85%

Corrective Measures – Institutional Controls

- Draft Deed Restrictions 30%
- Recorded USEPA and MDEQ approved restrictive covenant for the retention basin property (Nov 2016/ Montcalm Street) 100%

Corrective Measures – Soil

- AOI M-27 soil delineation completed (Mar 2013) 100%

- AOI M-27 arsenic-impacted soil removal (Dec 2013) 100%
- Draft Interim Measures Work Plan - TSCA soil cap submitted to USEPA (5/13/15) 90%

Corrective Measures – Groundwater/LNAPL

- LNAPL investigation on USPS property (Sept-Nov 2012) 100%
- Quarterly monitoring of USPS transmissivity/sentry wells (Feb-Dec 2013) 100%
- LNAPL investigation at AOIs M-2 and W-8 (Aug-Nov 2013) 100%
- PCB delineation at AOIs M-2, LNAPL Areas 1/7, 2A, 2B (June-Dec 2014) 100%
- 2013/2014 LNAPL Investigation Tech Memo submitted (1/30/15) 100%
- Draft PCB Investigation Summary Memo submitted (2/6/2015) 100%
- Additional PCB LNAPL Delineation activities (Apr-June 2015) 100%
- Draft 2014-2015 PCB Investigation Summary memo (8/17/15) 100%
- Supplemental Characterization Summary Report submitted (7/21/16) 100%
- Supplemental Soil Gas Data Evaluation Memo submitted (9/1/16) 100%
- 1,4-Dioxane Investigation Summary Report (submittal estimated Feb 2017) 30%

Groundwater Monitoring

- 2011 Annual Groundwater Report submitted to USEPA (1/5/12) 100%
- 2012 Annual Groundwater Report submitted to USEPA (2/9/13) 100%
- 2013 Annual Groundwater Report submitted to USEPA (4/16/14) 100%
- 2014 Annual Groundwater Report submitted to USEPA (12/18/14) 100%
- 2015 Annual Groundwater Report submitted to USEPA (12/23/15) 100%
- 2016 Annual Groundwater Report submitted to USEPA (12/29/16) 100%

Storm Sewers

- Montcalm toe drain swale construction (Feb 2012) 100%
- Sewer bulkheading activities completed (Apr 2012) 100%
- Swale/sidewalk construction (Sept 2012) 100%
- Montcalm discharge investigation completed (July-Sep 2013) 100%
- Discharge Request submitted to City of Pontiac (Oct 2013) 100%
- Montcalm Avenue Sidewalk Amendment (1 foot aggregate cover) installed on the sidewalk (May 2015) 100%
- Montcalm Discharge Feasibility Study/Data Collection (Jan - June 2015) 100%
- Montcalm Seep Assessment Memo submitted to USEPA (2/9/15) 100%

- Montcalm Avenue Seep Remedy Evaluation (Mar 2015 - ongoing) 70%

Former RCRA Hazardous Waste Management Units (WMUs) – (Fiero property – 2 WMUs, USPS property – 1 WMU)

- Soil/groundwater delineation completed during RFI activities (2001-2011) 100%
- Receipt of MDEQ letter “Referred to Corrective Action for Closure; Revitalizing Auto Communities Environmental Response (RACER) Trust, Former Fiero Assembly Plant, Pontiac, Michigan; MID 005 356 910” March 3, 2013.
- Proposed corrective measures for WMUs (site-wide deed restrictions) incorporated into Fiero Focused CMS and revised Draft PNC CMS. Anticipated deed restrictions will prohibit the use of groundwater, limit the use of the property to non-residential, and require soil management in accordance with Michigan regulations.
- MDEQ Waste Management division inspection of 2 former waste management units (WMUs) on the Fiero property on April 15, 2015. 100%

Project Schedule – Work to be completed during next reporting period

A task based Gant chart for the 2017 Project Schedule is attached.

Items scheduled to be completed during the next reporting period:

- Respond to and finalize RFI report after receipt of USEPA comments.
- Complete and submit 1,4-Dioxane Investigation Summary Report.
- Complete and submit revised Draft PNC CMS (update to account for groundwater/LNAPL and soil vapor data collected in 2016).
- Finalize and submit Montcalm Seep IM Work Plan, begin procurement and construction activities.
- USPS WMU inspection coordination.
- Annual inspection of the existing soil caps and maintenance (if necessary).
- 1,4-Dioxane investigation follow up activities, if necessary.
- Prepare and submit a Corrective Action Complete with Controls request for the retention basin property.
- Prepare and submit any needed budget amendments.

Mr. Nate Nemani
January 16, 2017

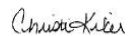
Problems Encountered

None

Should you have any questions on the information provided within this progress report, please feel free to contact me.

Sincerely,

Arcadis of Michigan, LLC



Christi Kiker

Certified Project Manager

Enclosure:

Attachment

1 2017 Project Schedule

Copies:

Dan Dailey, MDEQ

Dave Favero, RACER

File

