

Ms. Jennifer Stanhope  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard, LU-9J  
Chicago, Illinois 60604-3590

Arcadis of Michigan, LLC  
28550 Cabot Drive  
Suite 500  
Novi  
Michigan 48377  
Phone: 248 994 2240  
[www.arcadis.com](http://www.arcadis.com)

Date: July 15, 2024  
Our Ref: 30214041

Subject: Semi-Annual Progress Report, January 2024 – June 2024  
Performance Based Administrative Order on Consent  
Docket No. RCRA-5-2011- 0019; RACER Trust Pontiac North Campus  
Site 11970 - MID 005 356 886, MID 085 470 102 & MID 005 356 910  
Pontiac, Michigan

Dear Ms. Stanhope,

This progress report has been prepared in accordance with Section VI (24b) of the Administrative Order of Consent (AOC; 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 January 1, 2024, through June 30, 2024, for the portions of the Pontiac North Campus (PNC or Site) for which RACER Trust is responsible for remediation. Please note that based on agreement with USEPA, the Joslyn properties are not included under RCRA Corrective Action and are being addressed separately with USEPA and the Michigan Department of Environment, Great Lakes, and Energy (EGLE). Summary of progress addressing the Joslyn properties is, however, provided in this report.

Work Performed from January 1, 2024, through June 30, 2024:

(Includes references to reports which provide relevant details and data collected)

- Submitted July – December 2023 Semi-Annual Progress Report to USEPA on January 15<sup>th</sup>, 2024.
- Prepared and submitted 2023 Fiero Temporary Monitoring Plan Third Quarter Results on January 18<sup>th</sup>, 2024.
- Prepared and submitted PFAS Groundwater Sampling Summary report on January 19<sup>th</sup>, 2024. USEPA comments were provided via email on February 27<sup>th</sup>, 2024 and were discussed during the March 21<sup>st</sup>, 2024 monthly meeting. The revised report was resubmitted to USEPA on April 24<sup>th</sup>, 2024. Per further discussion with USEPA during the April 25<sup>th</sup>, 2024 monthly meeting, updated recommendations were provided via email correspondence on June 10<sup>th</sup>, 2024. USEPA provided approval to the response and scope of work via email transmittal on June 20<sup>th</sup>, 2024. The summary report was updated, finalized, and re-submitted to USEPA on June 27<sup>th</sup>, 2024 (On July 12, 2024, USEPA identified a couple discrepancies in the proposed sampling scope; therefore, a corrected final report was submitted that same day on July 12, 2024).
- Prepared and submitted RACER PNC LNAPL Assessment – MWM32-04 and TW-MD-06 memo on January 19<sup>th</sup>, 2024. USEPA comments were provided via email on February 13<sup>th</sup>, 2024 and were addressed via Response to Comment Memo submitted on April 4<sup>th</sup>, 2024. USEPA provided approval to the responses and scope of work via email transmittal on April 25<sup>th</sup>, 2024.

Ms. Jennifer Stanhope  
U.S. Environmental Protection Agency Region 5  
July 15, 2024

- Completed additional LNAPL gauging in the vicinity of MWM32-04 and TD-MD-06 March-May 2024 based on discussions with USEPA and per USEPA comments provided for the LNAPL Assessment Memo. RACER will submit a summary memo of these activities in third quarter 2024.
- Prepared and submitted RACER PNC Supplemental RCRA Facility Investigation Summary and Recommendations Memo on March 8<sup>th</sup>, 2024. USEPA comments were provided via email on June 11<sup>th</sup>, 2024. RACER will respond to comments in third quarter of 2024.
- Prepared and submitted 2023 Fiero Temporary Groundwater Monitoring Plan Summary with included 2024 Temporary Monitoring Plan as Appendix on March 22<sup>nd</sup>, 2024. During the March 21<sup>st</sup> monthly call with USEPA, the 2024 Temporary Monitoring Plan was presented for semi-annual sampling. USEPA approved the 2024 semi-annual sampling plan via email transmittal on March 22<sup>nd</sup>, 2024 and provided report comments via email correspondence on April 24<sup>th</sup>, 2024. Per further discussion with USEPA during the June 20<sup>th</sup>, 2024 monthly meeting, an updated report was submitted on July 3<sup>rd</sup>, 2024.
- Planned and completed semi-annual groundwater and soil vapor monitoring at Former Fiero properties from March 25<sup>th</sup> – 29<sup>th</sup>, 2024, and second quarter groundwater monitoring on June 24<sup>th</sup>, 2024.
- Prepared and submitted 2023 Annual Groundwater Monitoring Report on May 10<sup>th</sup>, 2024.
- Planned and completed supplemental groundwater monitoring from May 28<sup>th</sup> – 29<sup>th</sup>, 2024 in response to comments from the RACER PNC LNAPL Assessment Memo submitted on January 19<sup>th</sup>, 2024. RACER will include this data in the summary memo for LNAPL gauging activities to be submitted in third quarter 2024.
- Planned and completed supplemental PFAS groundwater monitoring at MWW1-06 on June 13<sup>th</sup>, 2024 in response to comments on the PFAS Groundwater Sampling Summary Report.
- Prepared and submitted 2023 Annual Inspection Report to USEPA on June 13<sup>th</sup>, 2024. The Inspection Report was also submitted to property owners on June 19<sup>th</sup>, 2024 via email transmittal.
- Planned and completed semi-annual PFAS groundwater monitoring from June 20<sup>th</sup> – 21<sup>st</sup>, 2024.
- Conducted routine O&M associated with the Montcalm Street Seep Control System from January through July 2024; seepage of groundwater from the Site onto Montcalm Street continues to be prevented during this timeframe.
- Continued evaluation of system optimization and modification options for the Montcalm seep.
- Continued support and coordination with existing property owners to complete necessary corrective action activities.

#### Data Collected

Data collected relevant to the Work Performed described above is included in the applicable report submittals.

#### Estimated Percent Complete

Project Management Ongoing

#### **Corrective Action – General**

- Current Conditions Report submitted to USEPA (11/25/11) 100%
- 2012 Budget Authorization approved by USEPA (12/9/11) 100%

Ms. Jennifer Stanhope  
 U.S. Environmental Protection Agency Region 5  
 July 15, 2024

- 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 by USEPA (9/19/12) 100%
- 2012 Budget Amendment 3 approved by USEPA (9/19/12) 100%
- 2013 Budget Authorization approved by USEPA (1/25/13) 100%
- Draft CMP Report submitted to USEPA (3/15/13) 100%
- 2013 Budget Amendment 1 approved by USEPA (7/18/13) 100%
- 2013 Budget Amendment 2 approved by USEPA (11/12/13) 100%
- 2014 Budget Authorization approved by USEPA (11/20/13) 100%
- 2014 Budget Amendment 1 approved by USEPA (5/23/14) 100%
- 2015 Budget Authorization approved by USEPA (11/20/14) 100%
- Fiero Focused CMS approved by USEPA (7/1/15) 100%
- Draft Fiero CMI Work Plan (10/7/15) 100%
- 2016 Budget Authorization approved by USEPA (11/20/15) 100%
- 2016 Budget Amendment 1 approved by USEPA (9/9/16) 100%
- 2017 Budget Authorization approved by USEPA (11/22/16) 100%
- 2018 Budget Authorization approved by USEPA (12/12/17) 100%
- Draft Fiero CA 725 and CA 750 submitted to USEPA (12/22/16) 100%
- Draft Duck Pond CACC submitted to USEPA (1/6/17) 100%
- (Pursue this request only if needed for a potential sale of the property)
- Fiero CA 725 and 750 approved by USEPA (8/11/17) 100%
- Revised Draft PNC CMS submittal to USEPA NA  
 (CA Summary Report to be submitted instead of CMS, see below)
- 2018 Budget Amendment 1 approved by USEPA (7/18/18) 100%
- 2019 Budget Authorization approved by USEPA (11/23/18) 100%
- 2020 Budget Authorization approved by USEPA (12/20/19) 100%
- 2020 Budget Modification 1 approved by USEPA (2/3/20) 100%
- 2021 Budget Authorization approved by USEPA (12/11/20) 100%
- 2022 Budget Authorization approved by USEPA (11/22/21) 100%
- 2023 Budget Authorization approved by USEPA (12/15/22) 100%
- 2024 Budget Authorization approved by USEPA (1/9/24) 100%
- Draft Corrective Action (CA) Summary Report and Draft LNAPL Appendices  
 Submitted to USEPA (Drafts 3/8/21 and 6/19/21, respectively) 100%
- Responses to USEPA Comments on Draft CA Summary Report (10/21/21) 100%
- Responses to additional USEPA Comments on Draft CA Summary Report (3/02/22) 100%
- Responses to additional USEPA Comments on Draft CA Summary Report (5/03/22) 100%
- Revised Draft CA Summary Report, including Data Re-Screening (2/10/23) 100%
- Responses to additional USEPA Comments on Draft CA Summary Report (7/25/23) 100%
- Revised CA Summary Report, based on USEPA comments received 4/12/23 (7/25/23) 100%
- Supplemental RCRA Facility Investigation Scope of Work  
 (Draft 9/26/23). Response to USEPA comments (11/01/23) 100%
- Final submittal of Supplemental RCRA Facility Investigation Scope of Work (11/28/23) 100%

- Draft submittal of Supplemental RCRA Facility Investigation Summary and Recommendations Memo (3/8/24). Comments from USEPA received 6/11/24 and responses are pending. 80%

**Corrective Measures – Institutional Controls**

- Declaration of Restrictive Covenants (DRCs) recorded for all Site parcels 60%
- Recorded USEPA and MDEQ (now EGLE) approved DRC for the Duck Pond property (Nov 2016/ Montcalm Street) 100%
- Recorded DRC for the former Plant 14 South property (Nov 2017) 100%
- Recorded DRC for the USPS property (April 2018) 100%
- Submitted Draft First Amended DRC for Duck Pond Property to USEPA and EGLE (draft submitted 8/26/19; on hold) 90%
- Obtained USEPA and EGLE approval of First Amended DRC for the Proastio Parcel (former Plant 14 South) and Railroad Parcels (4/17/20) and Recorded (5/12/20) 100%
- Obtained approval from USPS and recorded First Amended and Restated DRC for the USPS property (12/17/21) 100%

**Corrective Measures – Soil**

- AOI M-27 arsenic-impacted soil delineation completed (Mar 2013) 100%
- AOI M-27 arsenic-impacted soil removal (Dec 2013) 100%
- Draft Interim Measures Work Plan - TSCA Soil Cap (former Plant 14 south property) submitted to USEPA (5/13/15) 100%
- 2017 PCB Soil Delineation Summary Memo submitted to USEPA (2/27/17) 100%
- 2018 PCB Soil Delineation Summary Memo submitted to USEPA (5/08/18) 100%
- 2018 Additional PCB Soil Delineation Summary Memo submitted to USEPA (7/25/18) 100%
- PCB-impacted Soil Interim Measures Removal Work Plan approved by USEPA (7/10/19) 100%
- PCB-impacted Soil AOI W-1 IMWP Field Implementation (Nov 2019 – Jun 2020) 100%
- PCB-impacted Soil AOI W-1 IMWP Completion Report submitted to USEPA (3/31/21) 100%
- Completed Supplemental RCRA Facility Investigation field work (11/06/23-11/09/23) 100%

**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 to USEPA (1/30/15) 100%
- Draft PCB Investigation Summary Memo submitted to USEPA (2/6/15) 100%
- Additional PCB LNAPL Delineation Activities (Apr-June 2015) 100%
- Draft 2014-2015 PCB Investigation Summary Memo submitted to USPEA (8/17/15) 100%
- Supplemental Site (USPS Property) Characterization Summary Report submitted to USEPA (7/21/16) 100%
- Supplemental Soil Gas Data Evaluation Memo (USPS Property) submitted to USEPA (9/1/16) 100%

Ms. Jennifer Stanhope  
 U.S. Environmental Protection Agency Region 5  
 July 15, 2024

- Supplemental 1,4-Dioxane Investigation Summary Report submitted to USEPA (12/7/17) 100%
- LNAPL Interim Measures Feasibility Confirmation and Pre-Design Specification Testing memorandum submitted to USEPA (4/27/18) 100%
- Supplemental 1,4-Dioxane/VOC Groundwater Investigation Summary Report submitted to USEPA (6/13/18) 100%
- Additional LNAPL Pre-Design / Transmissivity Testing and Interim Measures Removal Work Plan submitted to USEPA (8/27/18) 100%
- Supplement to June 13, 2018 1,4-D/VOC Memo Report; Evaluation of Groundwater Data Compared to USEPA Screening Levels (1/9/19) 100%
- LNAPL Interim Measures Removal Implementation at RW-08-14 (May 2019) 100%
- Duck Pond Summary for GSI Pathway Determination submitted to USEPA (6/18/19) 100%
- 2019-2020 Duck Pond GW Investigation Memo submitted to USEPA (4/7/20) 100%
- LNAPL Recovery System (RW-08-14) Completion Memo Report (4/28/20) 100%
- Fiero Property VI USEPA/EGLE-Approved SOW Field Implementation (9/2/20) 100%
- 2020 Additional Tn Testing Memorandum Report submitted to USEPA (3/4/21) 100%
- Fiero Property Well Installation & Groundwater Monitoring Report submitted to USEPA (5/14/21) 100%
- Fiero Property Conceptual Site Model (CSM) Report (9/8/21) 100%
- Fiero Property Source Investigation Scope of Work (9/7/21) 100%
- DRAFT 2021 RW-08-14 Tn Testing / Shutdown Request Memorandum submitted to USEPA (12/21/21) 100%
- Response to USEPA Comments on 2021 RW-08-14 Tn Testing / Shutdown Request Memorandum (4/25/22) 100%
- Fiero Site Investigation Summary Report (Draft 4/27/22, Comments provided by USEPA on 6/6/22, Response to comments provided on 7/15/22, Additional comments provided by USEPA on 8/8/22, Response to comments provided on 9/9/22, Final 2/23/23, No further comments from USEPA in email dated 7/7/23) 100%
- 2022 RACER Pontiac North Campus Water Well Survey (Draft 6/24/22; revised version submitted to USEPA on 10/20/23 to address USEPA comments) 100%
- Fiero Property SOW Implementation and CSM Refinement completed (July/August 2022) 100%
- In Situ Chemical Reduction with ZVI Pilot Study Workplan (Draft 7/7/22, USEPA and EGLE approval 11/18/22, Final 1/04/23 incorporating comments provided by USEPA and EGLE ) 100%
- Zero Valent Iron Pilot Test Work Plan Presentation to USEPA and EGLE (10/7/22) 100%
- Final RW-08-14 Shutdown Request Memorandum (7/21/22; USEPA approval on 7/25/22) 100%
- Additional Fiero investigation work and ZVI performance well installation (October 2022) 100%
- RW-08-14 LNAPL System Decommission Memo (Draft 10/26/22, Final 4/12/23) 100%
- Former Fiero Property Supplemental Site Investigation Scope of Work Report – Dated July 21, 2022 (final submitted 12/21/22) 100%
- In Situ Chemical Reduction with Zero Valent Iron Pilot Study Installation Summary (Final 3/20/23) 100%
- RACER PNC LNAPL Assessment – MWM32-04 and TW-MD-06 memo (1/19/24; USEPA comments provided; response to comments 4/4/24; USEPA approval 4/25/24) 100%

Ms. Jennifer Stanhope  
 U.S. Environmental Protection Agency Region 5  
 July 15, 2024

- PNC LNAPL Assessment Memo for MWM32-04 and TW-MD-06 – Subsequent Work 5%

**Groundwater Monitoring and Other O&M**

- 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%
- 2017 Annual Groundwater Report submitted to USEPA (2/30/18) 100%
- Well Abandonment Request submitted to USEPA (3/7/18) 100%
- Groundwater Monitoring Program Modification Request submitted to USEPA (8/27/18) 100%
- 2018 Annual Groundwater Report submitted to USEPA (1/29/19) 100%
- 2019 Annual Groundwater Report submitted to USEPA (2/18/20) 100%
- Fiero Properties Well Locating Memo Report (12/18/20) 100%
- Fiero Properties Well Abandonment Memo Report (12/18/20) 100%
- 2020 Annual Groundwater Report submitted to USEPA (3/4/21) 100%
- 2021 Annual Groundwater Report submitted to USEPA (2/10/22) 100%
- Fiero Temporary Monitoring Plan (2/23/22) 100%
- Proposed Fiero Well Abandonment Memo (4/08/22) 100%
- RACER Pontiac North Campus 2021 Property Inspection Report (4/15/22) 100%
- 2022 Fiero Temporary Groundwater Monitoring Plan Summary (4/21/23) 100%
- Fiero First Quarter 2022 Results Data Memo (5/20/22) 100%
- Fiero Second Quarter 2022 Results Data Memo (9/7/22) 100%
- Fiero Third Quarter 2022 Results Data Memo (12/14/22) 100%
- 2022 Annual Groundwater Report submitted to USEPA (8/10/23) 100%
- 2022 Property Inspection Report (8/31/23) 100%
- 2023 Revised Fiero Temporary Monitoring Plan (Draft 2/16/23, Comments provided by USEPA on 2/27/23, Response to comments 3/9/23, USEPA approval received 3/16/23, and Final 4/4/23) 100%
- 2023 Fiero Temporary Monitoring Plan 1Q Results Memo (6/13/23) 100%
- 2023 Fiero Temporary Monitoring Plan 2Q Results Memo (10/3/23) 100%
- 2023 Fiero Temporary Monitoring Plan 3Q Results Memo (1/18/24) 100%
- 2023 Fiero Temporary Groundwater Monitoring Plan Summary (Draft 3/22/24, Comments provided by USEPA on 4/24/24, Final 7/3/24) 100%
- 2023 Annual Groundwater Report submitted to USEPA (Draft 5/10/24) 90%
- Montcalm Seep Control System Operation, Maintenance & Monitoring Ongoing

**Storm Sewers**

- Montcalm toe drain swale construction (Feb 2012) 100%
- Sewer bulkheading activities completed (Apr 2012) 100%

Ms. Jennifer Stanhope  
 U.S. Environmental Protection Agency Region 5  
 July 15, 2024

- 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 Seep IM Work Plan submitted to USEPA/MDEQ (11/10/17) 100%
- Montcalm Injection Test Summary Memo Report submitted to USEPA/MDEQ (1/31/18) 100%
- Montcalm Seep Interim Measures Revised Work Plan submitted to USEPA/MDEQ (4/13/18) – MDEQ Approval (6/8/2018), USEPA Approval (6/25/18) 100%
- Montcalm Seep Interim Measures Implementation (June 2019) 100%
- Fiero Summary of Former VOC Detections Memo Report submitted to USEPA (3/3/20) 100%
- Montcalm Seep Control System Completion Memo Report submitted to USEPA (7/15/20) 100%
- Montcalm IM Monitoring Report submitted to USEPA (09/10/20) 100%
- Montcalm Seep NPDES Permit Discharge Application submitted to EGLE (3/31/21), PFOS concentrations detected in samples collected need to withdraw permit application 75%

Former RCRA Hazardous Waste Management Units (WMUs). Includes Fiero property WMU AOI F-3 (southern Fiero former hazardous waste drum storage pad), Fiero property AOI F-6 (northern Fiero former Plant 17 tank farm), and USPS property WMU AOI W-2 (west yard former hazardous waste storage)

- 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. 100%
- Proposed corrective measures for WMUs (site-wide deed restrictions) incorporated into Fiero Focused CMS (USEPA approved on 7/1/15) and CA Summary Report (being revised). 100%
  - Anticipated deed restrictions will prohibit the use of groundwater, limit the use of the property to non-residential, and require soil and soil vapor management in accordance with Michigan regulations.
- MDEQ Waste Management Division inspection of 2 former waste management units (WMUs) on the Fiero property (4/15/15). No violations or comments. 100%
- MDEQ Waste Management Division inspection of 2 former waste management units (WMUs) on the Fiero property (10/25/17). No violations or comments. 100%
- EGLE Waste Management Division focused Corrective Action Inspection of the RACER PNC Site (7/27/20) and Acceptance of Responses (8/26/20) 100%
- Addressed in CA Summary Report included in Corrective Action – General section above

**Initial Groundwater Screening for PFAS**

- Initial PFAS Sampling Plan (Draft 2/3/23, Comments provided by USEPA on 3/3/23, Response to Comments provided on 4/7/23, Final 4/18/23) 100%

Ms. Jennifer Stanhope  
U.S. Environmental Protection Agency Region 5  
July 15, 2024

- Initial PFAS Sampling Results and Supplemental PFAS Sampling Plan (12/8/23) 100%
- PFAS Groundwater Sampling Summary (6/27/24) 100%

**Joslyn Avenue Parcels (Not subject to RCRA CA)**

- Submitted Joslyn Ave Parcel Historical Summary Memorandum & RCRA Determination (1/19/21). USEPA approved with conditions. 100%
- Joslyn North Parcel Investigation Report submitted to USEPA (8/03/21) 100%  
USEPA approved No Further Action with a condition requiring a DRC (9/29/2021)
- Joslyn South Parcel Investigation Report submitted to USEPA & EGLE (Draft 8/24/21) 100%
- Joslyn North Parcel Well Abandonment Summary Memo submitted to USEPA (12/20/21) 100%
- Draft DRC for Joslyn North Property submitted to USEPA and EGLE (1/7/2022)  
Approved by USEPA 3/1/2022; EGLE review pending 95%
- Joslyn South Parcel Delineation Investigation (Field Work Completed 11/19/21-12/10/21) 100%
- Joslyn South Parcel Investigation Report (7/15/22) 100%
- Joslyn South Parcel on-site soil borings (12/19/22) 100%
- 2022 Joslyn South Parcel Groundwater and Soil Investigation Summary Report (5/12/23) 100%
- 2023 Joslyn Temporary Monitoring Plan First and Second Quarter Results (10/11/23) 100%

Project Schedule – Work Targeted for Completion During Next Reporting Period

An updated task-based Gant chart for the 2024 Project Schedule is attached. Items scheduled to be completed during the next reporting period:

- Submit 2023 Joslyn Summary Report
- Submit 2024 Revised Groundwater Monitoring Work Plan and Well Repair, Replacement, and Abandonment Recommendations
- Submit Fiero Parking Lot Memo
- Submit Response to USEPA Comments to Supplemental RCRA Facility Investigation Summary and Recommendations Memo
- Complete second phase of Supplemental RCRA Facility Investigation Scope of Work and prepare summary report for submittal – to be determined based on RACER Trust Funding Prioritization Process
- Complete installation of soil vapor monitoring probes offsite west of Fiero and sample for VOCs (completed 7/1/24). Submit a memo describing work completed and investigation results.
- Complete Fiero groundwater and soil vapor sampling in third quarter 2024 per USEPA approved Fiero TGMP
- Complete annual groundwater monitoring event fourth quarter – will utilize updated Groundwater Monitoring Plan if approved by USEPA before preparation of event
- Complete annual Site inspection during fourth quarter
- Complete fourth quarter sampling for PFAS as outlined in PFAS Summary Report approved by USEPA
- Following USEPA approval of the Revised CA Summary Report, an Operation, Maintenance, and Monitoring (OMM) Plan will be prepared for the Site. This document will be provided to USEPA for review and approval.
- Continue Montcalm Seep Control System IMWP OMM
- Continue Montcalm Seep System optimization discussions
- Respond to any comments received from USEPA or EGLE on submittals or other matters

Ms. Jennifer Stanhope  
U.S. Environmental Protection Agency Region 5  
July 15, 2024

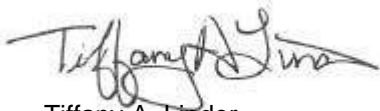
- Provide support to USEPA and initiate updates to other RCRA decision process documents as determined appropriate
- Support development and finalization of deed restrictions for the Site as determined appropriate

Problems Encountered

No problems were encountered during the reporting period.

Should you have any questions on the information provided within this progress report, please feel free to contact Brendan Mullen with RACER Trust at [bmullen@racertrust.org](mailto:bmullen@racertrust.org) 201-247-4890 or me.

Sincerely,  
Arcadis of Michigan, LLC



Tiffany A. Linder  
Certified Project Manager

Email: [tiffany.linder@arcadis.com](mailto:tiffany.linder@arcadis.com)  
Direct Line: 810 225 1928

CC. Dan Dailey, EGLE  
Emily Bertolini, EGLE  
Dave Favero, RACER Trust  
Brendan Mullen, RACER Trust

Enclosures:

**Attachment**

- 1 2024 Project Schedule

# Attachment 1

**2024 Project Schedule**

RACER Pontiac North Campus  
2024 Annual EA Budget Request  
Project Schedule

ID	Task Name	Duration	Start	Finish	12/24	January 1 1/7	1/21	February 1 2/4	2/18	March 1 3/3	3/17	3/31	April 1 4/14	4/28	May 1 5/12	5/26	June 1 6/9	6/23	July 1 7/7	7/21	August 1 8/4	8/18	September 1 9/1	9/15	9/29	October 1 10/13	10/27	November 1 11/10	11/24	December 1 12/8	12/22					
1	<b>Task 1 - Project Management</b>	263 days	Mon 1/1/24	Tue 12/31/24	[Summary Bar]																															
2	<b>Monthly PM Activities</b>	263 days	Mon 1/1/24	Tue 12/31/24	[Summary Bar]																															
15	Prepare, Submit & Obtain Approval of 2025 Budget Authorization	64 days	Mon 9/2/24	Thu 11/28/24	[Blue Bar]																															
16	<b>Task 2 - Corrective Action (General)</b>	140 days	Mon 1/1/24	Fri 7/12/24	[Summary Bar]																															
17	Semi-Annual Progress Report Prep/Submittal for 2nd Half of 2023	11 days	Mon 1/1/24	Mon 1/15/24	[Blue Bar]																															
18	Semi-Annual Progress Report Prep/Submittal for 1st Half of 2024	10 days	Mon 7/1/24	Fri 7/12/24	[Blue Bar]																															
19	CA Summary Addendum Generation	TBD			[Blue Bar]																															
20	Updated Site GMP Generation and Submittal	TBD			[Blue Bar]																															
21	Operation & Maintenance Manual (OMM) Generation and Submittal	TBD			[Blue Bar]																															
22	Additional RCRA Corrective Action final decision process support activities	TBD			[Blue Bar]																															
23	<b>Task 3 - Corrective Measures Institutional Controls</b>				[Summary Bar]																															
24	DRC attachment support	TBD			[Blue Bar]																															
25	<b>Task 4 - Corrective Measures - Soil</b>	260 days	Tue 1/2/24	Fri 12/27/24	[Summary Bar]																															
26	CA Investigation Continued if Needed	TBD			[Blue Bar]																															
27	Allowance for additional soil investigations	TBD			[Blue Bar]																															
28	Fiero Soil Gas Sampling	260 days	Tue 1/2/24	Fri 12/27/24	[Green Bar]																															
29	<b>Task 5 - Corrective Measures - GW / LNAPL</b>	261 days?	Tue 1/2/24	Mon 12/30/24	[Summary Bar]																															
30	Continued Well Repair, Protection and Abandonment Activities	130 days	Wed 7/3/24	Mon 12/30/24	[Blue Bar]																															
31	USPS LNAPL Well Abandonment and Reporting	TBD			[Blue Bar]																															
32	Fiero Monitoring, Data Evaluation and Reporting	261 days?	Tue 1/2/24	Mon 12/30/24	[Blue Bar]																															
33	Joslyn Groundwater Monitoring, Data Evaluation and Reporting (Not CA)	5 days	Mon 10/28/24	Fri 11/1/24	[Green Bar]																															
34	<b>Task 6 - Groundwater Monitoring and Other O&amp;M</b>	75 days?	Tue 9/17/24	Mon 12/30/24	[Summary Bar]																															
35	Annual Groundwater Sampling	5 days	Mon 10/7/24	Fri 10/11/24	[Blue Bar]																															
36	Preparation of 2023 and 2024 Annual GW Report	56 days	Mon 10/14/24	Mon 12/30/24	[Blue Bar]																															
37	Annual Inspections	2 days?	Tue 9/17/24	Wed 9/18/24	[Blue Bar]																															
38	Annual Inspection Report 2023 and 2024	21 days?	Mon 12/2/24	Mon 12/30/24	[Blue Bar]																															
39	<b>Task 7 - Storm Sewers (Seep)</b>	264 days?	Mon 1/1/24	Wed 1/1/25	[Summary Bar]																															
40	Montcalm Seep Control System OMM	264 days?	Mon 1/1/24	Wed 1/1/25	[Green Bar]																															
41	<b>Task 31 - PFAS Characterization</b>	TBD			[Blue Bar]																															
42	Additional PFAS Characterization	TBD			[Blue Bar]																															
43	<b>Task 32: PFAS Risk/Exposure Pathway Analysis</b>				[Summary Bar]																															
44	Risk/Exposure Pathway Analysis Report	TBD			[Blue Bar]																															
45	<b>Task 34: PFAS Pilot Test</b>	TBD			[Blue Bar]																															
46	<b>Task 35: PFAS Final System Design</b>	TBD			[Blue Bar]																															

RACER PNC/Fiero 2022 Schedule  
Date: Fri 1/12/24

Task		Summary		External Milestone		Inactive Summary		Manual Summary Rollup		Finish-only	
Split		Project Summary		Inactive Task		Manual Task		Manual Summary		Progress	
Milestone		External Tasks		Inactive Milestone		Duration-only		Start-only		Deadline	