

Peter Quackenbush
Michigan Department of Environmental Quality, RMD
525 West Allegan Street
Constitution Hall, North Atrium
Lansing, Michigan 48909-7741

Subject:
Quarterly Progress Report – 1st Quarter 2018
RACER Lansing Plants 2, 3, and 6 Industrial Land
USEPA I.D.s MID980700827 and MID005356928
2801 West Saginaw St., 2800 West Saginaw St., and 401 Verlinden St.
Lansing, Michigan

Dear Mr. Quackenbush:

Arcadis of Michigan, LLC (Arcadis) is submitting this Quarterly Progress Report on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust for Lansing Plants 2, 3, and 6, Industrial Land, in Lansing, Michigan (the Sites). Please note that to the extent possible quarterly progress report submittals have been in the form of project update presentations that RACER has shared with the Michigan Department of Environment Quality (MDEQ) during update meetings. However, no such meeting was held near the end of the first quarter 2018 so this written progress report has been prepared. Future progress reports will be in the form of project update presentations whenever possible.

This Quarterly Progress Report covers the period of January 1, 2018 through March 31, 2018. The following briefly summarizes the work performed and project schedule for various activities.

Work Performed

- The biosparge pre-design study was ongoing from January 1st through March 31st. During this period routine operations, maintenance and monitoring (OMM) and performance monitoring was completed. Routine performance monitoring and OMM included:
 - Performance Monitoring: Groundwater samples were collected bi-weekly to monthly and analyzed for 1,4-dioxane and propane.
 - Routine OMM: Routine OMM on the system was completed on the same schedule as performance monitoring. Routine OMM included general equipment inspections; a check of propane levels; inspection of the desiccant dryer; inspection of the in-line filters and collection of (propane) Lower Explosive Level (LEL) readings at select wells.
- Lansing Board of Water and Light (LBWL) was on-site from January 1st through March 31st, 2018 installing new overhead electric lines in their easement parallel to the rail road tracks. This work is still ongoing.

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Environment

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April 17, 2018

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Our ref:
B0064479.2018

- Monthly Light Non-Aqueous Phase Liquid (LNAPL) gauging and recovery was completed during the first quarter of 2018.
 - A total of approximately 16 gallons of LNAPL was recovered during the first quarter.
- Consumers Energy was on-site starting February 26th, 2018 installing a new below ground gas line in their easement parallel to the rail road tracks. This work is still ongoing.
- Between March 5th and March 8th, 2018, the first quarter groundwater monitoring event was completed. This event included the following:
 - Gauging and sampling of eight (8) groundwater monitoring wells. Five (5) monitoring wells were analyzed for 1,4-dioxane and three (3) monitoring wells were analyzed for Per and Polyfluoroalkyl Substances (PFAS).
 - Gauging of 24 LNAPL monitoring wells.
- A written response was submitted to MDEQ on February 14, 2018 regarding their comments to the pathway analysis completed as part of the Resource Conservation Recovery Act (RCRA) Feasibility Investigation (RFI) Phase 2 Activities Summary Report.
- A PFAS Off-Site Delineation Work Plan was submitted to MDEQ on February 15, 2018. A revised PFAS Off-Site Delineation Work Plan was submitted to MDEQ on March 7, 2018.
- The LNAPL Composition Report, summarizing recent total petroleum hydrocarbon (TPH) analysis and all LNAPL composition data collected to date, was submitted to MDEQ on March 8, 2018.
- The Natural Source Zone Deletion (NSZD) Work Plan was submitted to MDEQ on March 20, 2018.
- Several meetings were held during the first quarter 2018. The date and purpose of these meeting are summarized below:
 - A Site update meeting at MDEQ offices attended by LBWL, RACER and Arcadis took place on January 9, 2018. The purpose of this meeting was to provide the MDEQ with updates related to the lower 1,4-dioxane Interim Measure (IM) Workplan/biosparge pilot study; PFAS investigations and path forward and updates/supporting documentation related to proposed LNAPL corrective measures.
 - A video conference with MDEQ took place on February 6, 2018 to discuss the lower 1,4-dioxane IM Workplan.
 - A meeting at MDEQ offices took place on February 28, 2018 to discuss the lower 1,4-dioxane IM Workplan with MDEQ's Remediation Advisory Team (RAT).

Work in Progress and Near-Term Milestones Anticipated During the 2nd Quarter 2018

Activity	Schedule
Continue with the Biosparge pre-design pilot study.	April – June 2018
Submit Plant 3 Storm Sewer Bulkheading Interim Measures Work Plan	April/May 2018
Submit the 2017 Annual Interim Groundwater Monitoring Report to MDEQ.	April/May 2018
Submit the biosparge pre-design pilot study final report.	May/June 2018
Submit the Plant 6 Construction Completion Report which will summarize the corrective measures completed at Plant 6.	May/June 2018
Complete 2Q 2018 IGMP Groundwater Sampling Event.	May/June 2018
Complete the field efforts associated with the Off-Site PFAS Investigation.	May/June 2018
Finalize a Declaration of Restrictive Covenant for Plant 6	June/July 2018
Submit the Plants 2 & 3 Soils Corrective Measures Work Plan.	June/July 2018
Project Update Meeting with MDEQ	June 2018

If you have any questions or comments regarding the information presented above, please contact Randy Christensen at Randy.Christensen@Arcadis.com or at 517.819.8800.

Sincerely,
Arcadis of Michigan, LLC

Randy Christensen
Project Manager

Copies:
Joe Rogers (MDEQ)
John McCabe (MDEQ)

Mr. Peter Quackenbush
April 17, 2018

Al Taylor (MDEQ)
Randy Seida (West Side Water)
Alec Melvetis (City of Lansing)
Steve Haywood (Lansing Township)
Sam Schultz (Lansing Township)
Angie Goodman (LBWL)
Cheryl Loudon (LWBL)
David Love (Ingham County Drain Commission)
Dave Favero (RACER Trust)