



October 15, 2014

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

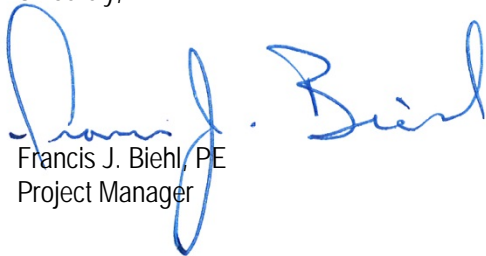
**Re: Semi-Annual Progress Report (April 2014 through September 2014)
RCRA Corrective Action Performance-Based Voluntary Agreement
Van Buren Landfill, Van Buren, Michigan**

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, 2014 through September 30, 2014. 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,



Francis J. Biehl, PE
Project Manager

Attachment A – Semi-Annual Progress Report (April 2014 – September 2014)

Cc: David Favero, RACER
Grant Trigger, RACER



TECHNICAL SKILL.
CREATIVE SPIRIT.

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ATTACHMENT A
SEMI-ANNUAL PROGRESS REPORT
PERFORMANCE-BASED VOLUNTARY AGREEMENT
VAN BUREN TOWNSHIP LANDFILL, VAN BUREN, MICHIGAN
April 1, 2014 to September 30, 2014

WORK PERFORMED THIS PERIOD

- Conducted soil boring/monitoring well installation and soil/ground water sampling (Phase III Investigation)– April 1, 2014 to April 30, 2014 (initiated March 31, 2014)
- Subconsultant Anchor OEA conducted an Ecological Risk Assessment – Steps 1 to 4 of USEPA Ecological Risk Assessment Process (initiated May 29, 2014)
- Submitted Phase III Site Investigation Report. Report included recommendations for additional (Phase IV) off-site delineation activities – September 4, 2014
- Expanded Site cross-sections based on additional characterization information collected during the Phase III activities (included in Phase III report)
- Conducted ground water sampling and analysis of the additional permanent monitoring wells installed during the Phase III activities, and surface water locations – April and May 2014
- Installed permanent monitoring well MW-27 (unable to be installed during primary Phase III field efforts due to standing water) – September 2, 2014
- Sampled monitoring wells located on eastern border of Site (includes MW-27) in order to further determine need for delineation on GM property – September 15, 2014
- Prepared Budget Amendment Request No.1, requesting additional funds and the reallocation of funds for the proposed Phase IV Investigation – September 2014
- 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 has been received and was included in Phase III Characterization Report. Additional sampling conducted during September 2014 will be included in future reports.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

- MW-27 was unable to be installed (as discussed above) during the primary Phase III efforts due to standing water in the proposed location. MW-27 was installed during September 2014 when conditions allowed.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

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

- Site Characterization SAP & QAPP 100%
Submitted by CRA to USEPA on February 17, 2012
Approved by the USEPA on June 4, 2012
- Consultant Selection 100%
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
- Clearing and Grubbing for Site Characterization Activities (Phase Ia) 100%
Completed from July 5 through July 16, 2012 and from July 23 through July 27, 2012
- 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 100%
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
- Clearing and Grubbing for Site Characterization Activities (Phase Ib) 100%
Completed March 25, 2013
- Site Characterization Fieldwork (Phase Ib) 100%
Completed from March 25, 2013 to April 4, 2013
- Human Health EI (CA725) Report (submitted June 28, 2013) 100%
- Site Characterization Phase Ib Data Report 100%
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
- Phase II Site Investigation Field Work 100%
Completed from December 3 through December 23, 2013
- Phase II Site Investigation Report 100%
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
- Phase III Site Investigation Field Work 100%
Completed from April 1 through April 30, 2014
- Phase III Site Investigation Report 100%
Including proposed delineation investigation Phase IV (submitted September 4, 2014)
- Ecological Risk Assessment, steps 1 to 4 (submitted September 8, 2014) 100%
- Ecological Risk Assessment (Anchor QEA, with MSG support), steps 5 to 8 0%
Dates TBD, approximate 1st quarter 2015
- Contaminated Groundwater Migration under Control EI (CA750) 0%
(Due June 15, 2015)

- Corrective Measures Proposal (Due September 30, 2015) 0%

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Obtain USEPA approval of proposed Phase IV Site Investigation activities – October 2014
- Obtain MDOT and Wayne County right-of-way permits for proposed soil borings/monitoring wells (Phase IV) – October 2014
- Obtain access agreements with General Motors and the Detroit Metro Water Department for proposed soil borings/monitoring wells (Phase IV) – October 2014 – December 2014
- Complete Phase IV Site Investigation activities – December 2014 (depends on obtaining off-site access)
- Complete Ecological Risk Assessment steps 5 to 8 – November 2014 – January 2015
- Prepare and submit Phase IV report – 1st Quarter 2015 (depends upon obtaining off-site access)
- Perform groundwater sampling and analysis for all permanent monitoring wells – November 2014
- Prepare Contaminated Groundwater Migration under Control EI (CA750) Report – March 2015
- Prepare Draft Corrective Measures Study – January 2015 – April 2015
- Prepare summaries of meetings, data reviews, or conference calls with USEPA - as appropriate
- Prepare draft and final 2014 Annual EA Budget Authorization Amendment Request No. 1 – October and November 2014
- Prepare draft and final 2015 Annual EA Budget Authorization Request – October 2014 – November 2014
- Prepare the Semi-Annual Progress Report for October 1, 2014 through March 31, 2015 - April 2015