



April 14, 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 (October 2013 through March 2013)
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 October 1, 2013 through March 31, 2014. The Mannik and 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, appearing to read 'Francis J. Biehl', is written over the typed name and title.

Francis J. Biehl, PE
Project Manager

Attachment A – Semi-Annual Progress Report (October 2013 – March 2014)

cc: David Favero, RACER
Grant Trigger, RACER



TECHNICAL SKILL.
CREATIVE SPIRIT.

ATTACHMENT A
SEMI-ANNUAL PROGRESS REPORT
PERFORMANCE-BASED VOLUNTARY AGREEMENT
VAN BUREN TOWNSHIP LANDFILL, VAN BUREN, MICHIGAN
October 1, 2013 to March 31, 2014

WORK PERFORMED THIS PERIOD

- Submitted Phase Ib Characterization Summary Report. The report was resubmitted after revisions were made in accordance with USEPA review comments. Report included recommendations for additional (Phase II) off-site delineation activities – October 7, 2013 and resubmitted November 20, 2013
- Prepared and submitted an additional benzene delineation scope of work (to be incorporated into the Phase II efforts) in support of the USEPA's goal of delineating the benzene impacted ground water and to investigate the potential for a source area within the landfill - October 31, 2013
- Conducted groundwater sampling and analysis – November 2013 and March 2014
- Conducted Phase II off-site delineation and benzene delineation investigation activities including soil boring/monitoring well installation and soil and groundwater sampling. Borings and temporary wells installed within MDOT ROW locations performed using MSG's 2013 Annual State of Michigan ROW Construction Permit (for any land survey and soil boring work done within an MDOT ROW) – December 3, 2013 to December 23, 2013
- Requested to extend the deadline to submit the CA750 demonstration to June 15, 2015 - February 1, 2014 and USEPA approved the extension on February 26, 2014
- Requested to extend the deadline to submit the Final Corrective Measures Proposal to September 30, 2015 - February 1, 2014 and USEPA approved the extension on February 26, 2014
- Prepared and submitted Phase II Site Investigation Report. Report included recommendations for additional (Phase III) off-site delineation and additional benzene delineation activities – submitted March 12, 2014
- Solicited proposals from multiple consultants for ecological risk assessment support in accordance with USEPA Region 5 ERA guidance – Proposals received March 28, 2014
- Obtained access from owner of property to the north of the Site (i.e. Mr. Harold Smith) to complete investigation activities on that property.
- Prepared draft of Michigan Department of Environmental Quality (MDEQ) Notice of Migration (NOM) including MDEQ Form EQP4482 and associated documentation. NOM to be finalized and distributed (to the MDEQ and adjacent property owners that have been impacted by the off-site migration of hazardous substances) after incorporation of the Phase III site investigation results - ongoing
- Technical action items: data reviews and progress reporting – ongoing

NEW DATA AVAILABLE THIS PERIOD

Soil and groundwater samples were collected by MSG, as discussed above, to delineate off-site groundwater impacts along the northern perimeter of the Site just inside the property line or within the Michigan Department of Transportation (MDOT) Right-of-Way (ROW) on either side of Michigan Avenue (west of the Site) or on the north and south sides of Ecorse Road (south of the Site) and the source(s) of the benzene impact in groundwater along the northern edge of the property. Soil and groundwater sample results provided in the Phase II Site Investigation Report submitted on March 12, 2014.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

- None.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

<ul style="list-style-type: none"> Current Conditions Report CRA submitted Draft Report to the USEPA - October 2011 Approved by USEPA during a conference call - November 21, 2011 	100%
<ul style="list-style-type: none"> Performance-Based Corrective Action Agreement Effective September 29, 2011 	100%
<ul style="list-style-type: none"> Site Characterization SAP & QAPP Submitted by CRA to USEPA on February 17, 2012 Approved by the USEPA on June 4, 2012 	100%
<ul style="list-style-type: none"> 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%
<ul style="list-style-type: none"> 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%
<ul style="list-style-type: none"> Site Characterization Fieldwork (Phase Ia) Completed from July 5 through September 25, 2012 	100%
<ul style="list-style-type: none"> 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%
<ul style="list-style-type: none"> Clearing and Grubbing for Site Characterization Activities (Phase Ib) Completed March 25, 2013 	100%
<ul style="list-style-type: none"> Site Characterization Fieldwork (Phase Ib) Completed from March 25, 2013 to April 4, 2013 	100%
<ul style="list-style-type: none"> Site Characterization Phase Ib Data Report Including proposed Phase II delineation of off-site groundwater impacts and benzene impacts investigation submitted October 7, 2013 Phase II Site Investigation scope approved by the USEPA on November 22, 2013 via e-mail 	100%
<ul style="list-style-type: none"> Phase II Site Investigation Field Work Completed from December 3 through December 23, 2013 	100%
<ul style="list-style-type: none"> Phase II Site Investigation Report Including proposed Phase III delineation of off-site groundwater impacts and benzene impacts investigation submitted March 12, 2014 Phase III Site Investigation scope approved by USEPA on March 18, 2014 via email 	100%
<ul style="list-style-type: none"> Phase III Site Investigation Field Work Started April 1, 2014 	0%
<ul style="list-style-type: none"> Phase III Site Investigation Report 	0%
<ul style="list-style-type: none"> Human Health EI (CA725) Report Submitted to USEPA June 28, 2013 	100%
<ul style="list-style-type: none"> Contaminated Groundwater Migration under Control EI (CA750) (Due June 15, 2015) 	0%
<ul style="list-style-type: none"> Corrective Measures Proposal (Due September 30, 2015) 	0%

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Complete Phase III Site Investigation activities including installation of permanent monitoring wells along adjacent properties to the north and south of the Site to further delineate potential groundwater impacts – April 2014
- Prepare and submit Phase III Site Investigation Report – April 2014 – May 2014
- Perform groundwater sampling and analysis for all permanent monitoring wells (i.e. those installed in Phases 1a, 1b, II and III) –August 2014
- Prepare and submit Groundwater Monitoring Report – September 2014 -October 2014
- Develop proposal for additional investigation, if necessary – to be determined
- Complete evaluation of data to assess potential ecological risk and develop proposed strategy – April 2014 – May 2014
- Develop proposal for additional investigation, if necessary – to be determined
- Prepare Corrective Measures Study – To be determined
- Prepare summaries of meetings, data reviews, or conference calls with USEPA - as appropriate
- Prepare the Semi-Annual Progress Report for April 1, 2014 through September 30, 2014 – September 2014