

Transmitted via E-mail

Mr. Nate Nemani
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
LU-9J
Chicago, IL 60604-3590

Arcadis of Michigan, LLC
28550 Cabot Drive
Suite 500
Novi
Michigan 48377
Tel 248 994 2240
Fax 248 994 2241
www.arcadis.com

ENVIRONMENT

Subject:

Performance Based Administrative Order on Consent, Docket No. RCRA-5-2011-0019
Semi-Annual Progress Report, July 2017 – December 2017
RACER Trust Pontiac North Campus Site 11970 - MID 005 356 886
Pontiac, Michigan

Date:

January 15, 2018

Contact:

Christi Kiker

Phone:

832 239 0892

Email:

Christi.Kiker@arcadis.com

Our ref:

B0064607.2017

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, 2017 through December 31, 2017 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, 2017 through December 31, 2017

- Submitted Semi-Annual Progress Report to USEPA on July 13, 2017.
- Based on the results of the completed PCB-impacted soil and LNAPL delineation activities, Montcalm seep analysis, and Supplemental Site

Characterization (1,4-dioxane) activities, revisions to the Draft CMS were completed. The Draft CMS was updated and will be submitted to USEPA in February 2018.

- Development of the draft Statement of Basis document began in December 2017.
- Fiero Waste Management Unit inspection site visit with MDEQ was conducted on October 25, 2017.
- Submitted PCB Soil Delineation Scope of Work to USEPA on October 4, 2017. Received approval from USEPA on October 5, 2017. Field work was completed the week of October 30th, 2017. Began development of investigation summary, including cross sections of proposed excavation areas, in December 2017.
- Installed signs along the border of the TSCA soil cap denoting the approximate cap location and requesting RACER be contacted prior to accessing or performing work in the area of the soil cap on December 1, 2017
- Completed field activities for the 1,4-D Quarterly Supplemental Scope of Work (sampling/gauging) the week of July 17th, 2017 (event 2 of 4) and the week of October 23rd, 2017 (event 3 of 4).
- Submitted the 2017 1,4-Dioxane Supplemental Investigation Memo to USEPA on December 7, 2017.
- Parcel 14-20-276-001 well abandonment activities were completed the week of July 17th, 2017. The Well Abandonment Summary was submitted to USEPA on November 21, 2017.
- The 2016 Annual Groundwater Monitoring Addendum, which included results from additional vinyl chloride analysis in the former Plant 25 area, was submitted to USEPA on July 31, 2017.
- The 2017 annual groundwater monitoring event was completed the week of October 23rd, 2017
- Submitted Montcalm Seep IM Work Plan to USEPA/MDEQ on November 10, 2017. Completed injection testing activities as specified in the IM Work Plan, including the installation of one injection well, during December 2017.
- Continued support and coordination with existing property owners.

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%
- 2018 Budget Authorization approved (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%
- Revised Draft PNC CMS submittal to USEPA 85%

Corrective Measures – Institutional Controls

- Draft Deed Restrictions 50%
- Recorded USEPA and MDEQ approved restrictive covenant for the Duck Pond property (Nov 2016/ Montcalm Street) 100%
- Recorded restrictive covenant for the former Plant 14 South property (Nov 2017) 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%
- PCB-impacted soil delineation (LNAPL Area No. 1/7) (Oct 2017) 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 (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%
- Supplemental 1,4-Dioxane Investigation Summary Report (12/7/17) 100%

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%
- 2016 Annual Groundwater Report Addendum to USEPA (7/31/17) 100%
- 2017 Annual Groundwater Report 95%

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 Seep IM Work Plan submitted to USEPA/MDEQ (11/10/17) 100%

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 (USEPA approved on 7/1/15) and revised Draft PNC CMS (to be submitted). 100%
 - 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. No violations or comments. 100%
- MDEQ Waste Management division inspection of 2 former waste management units (WMUs) on the Fiero property on October 25, 2017. No violations or comments. 100%

Project Schedule – Work to be completed during next reporting period

A task based Gant chart for the 2018 Project Schedule is attached.

Items scheduled to be completed during the next reporting period:

- Complete and submit Montcalm Seep IM Injection Testing Summary.
- Complete and submit 2017 Annual Groundwater Monitoring Report.
- Complete and submit PCB Soil Investigation Summary Report, complete data gap analysis if necessary.
- Develop LNAPL skimming IM work plan.

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- Complete and submit revised Draft PNC CMS.
- Procure contractor for implementation of Montcalm Seep Injection System.
- Complete 1,4-Dioxane sampling activities (quarterly well sampling in January).
- Complete and submit 1,4-Dioxane sampling data memo.
- Prepare site-wide well abandonment proposal.
- Support final decision process.
- Respond to any comments received from USEPA or MDEQ on submittals or other matters.
- Prepare and submit any needed budget amendments.

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

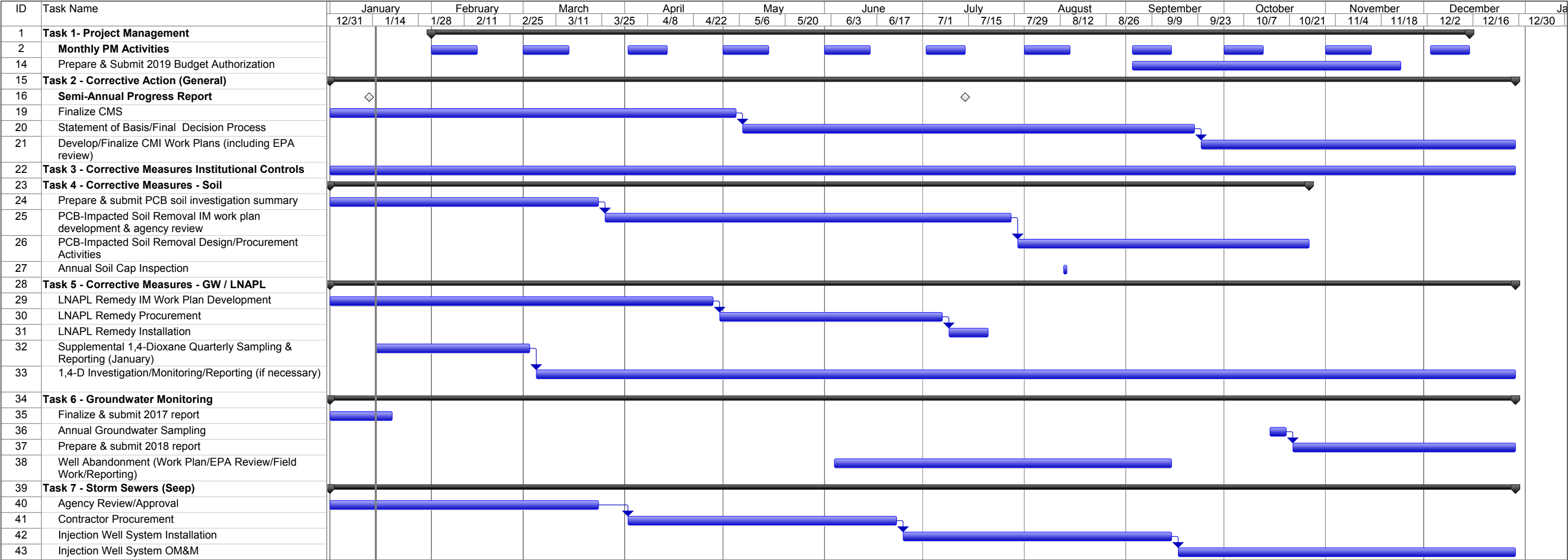
Enclosure:

Attachment

1 2018 Project Schedule

Copies:

Dan Dailey, MDEQ
Dave Favero, RACER
File



Project: PNC 2018 Schedule
Date: Mon 1/15/18

Task

Split

Milestone

Summary

Project Summary

External Tasks

External Milestone

Inactive Task

Inactive Milestone

Inactive Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

Start-only

Finish-only

Progress

Deadline

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