



April 12, 2018

Transmitted via E-mail

Mr. Brandon Pursel
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 2017 through March 2018)
RCRA Corrective Action Performance-Based Voluntary Agreement
Van Buren Landfill, Van Buren, Michigan

Dear Mr. Pursel:

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, 2017 through March 31, 2018 through. The Mannik & Smith Group, Inc. is submitting the attached progress report on behalf of RACER.

Please contact me or Dave Favero if you would like to discuss this matter further. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Francis J. Biehl'.

Francis J. Biehl, PE
Project Manager

Attachment A – Semi-Annual Progress Report (October 1 2017 – March 31 2018)

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
October 1, 2017 to March 31, 2018

WORK PERFORMED THIS PERIOD

- Conducted semi-annual ground water sampling and analysis of all of the permanent monitoring wells installed during the Phase I thru IV investigation activities as well as monitoring well CRA-266M located in the northeastern portion of the former RACER Trust Willow Run site during October 2017.
- Prepared the Van Buren Landfill and GM property-specific Groundwater Monitoring Reports associated with the October 2017 sampling event and submitted them to the USEPA of February 2, 2018.
- Prepared and submitted 2018 Environmental Draft Budget on October 18, 2017. USEPA approved the 2018 budget January 22, 2018.
- Technical action items: data reviews and progress reporting – ongoing
- Re-evaluated Risk Management in Ecological Assessment including call with EPA in December 2017 to address unacceptable ecological risks. Also included preparing Draft Memo describing Risk Management approach to be incorporated into Corrective Measure Study (CMS).
- Began revising the draft 2015 CMS.

NEW DATA AVAILABLE THIS PERIOD

- Ground water samples were collected by MSG, as discussed above. Laboratory analytical data has been received and was included in the “RACER Van Buren Landfill Site – October 2017 Semi-Annual Ground Water Sampling Results” and “RACER Van Buren Landfill Site - October 2017 Semi-Annual Ground Water Sampling Results for Wells on the Adjacent General Motors Property” reports, both dated and submitted to the USEPA on February, 2018.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

No problems were encountered during this period.

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
Submitted by CRA to USEPA on February 17, 2012
Approved by the USEPA on June 4, 2012 | 100% |
| • 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)
- Phase IV Site Investigation Field Work 100%
Completed from May 21, 2015 through March 10, 2016
- Phase IV Site Investigation Report (excluding Willow Run Airport property monitoring well activities) 100%
Submitted on July 23, 2015. Report specific to GM property submitted on September 2, 2015
- Draft Baseline Ecological Risk Assessment, steps 1 to 4 (submitted September 8, 2014) 100%
Comments received from USEPA on June 3, 2016
- Draft Baseline Ecological Risk Assessment (Anchor QEA, with MSG support), steps 5 to 8 100%
Draft submitted June 18, 2015

- RFI Summary Report 100%
Included as part of Draft CMS submitted October 2, 2015
- Contaminated Groundwater Migration under Control EI (CA750) 100%
Draft submitted June 30, 2015
- Corrective Measures Study 100%
Draft submitted October 2, 2015
- Draft Baseline Ecological Risk Assessment (Anchor QEA, with MSG support), Steps 1 to 2 100%
Report submitted to USEPA on August 5, 2016
- Draft Ecological Risk Assessment (Anchor QEA, with MSG support), Steps 5 to 8 100%
Received acceptance letter from USEPA dated September 14, 2016
Updated report submitted to USEPA on July 7, 2017
Received acceptance email from USEPA dated September 21, 2017
- Ecological Risk Mitigation Evaluation- MEMO drafted, February 8, 2018 100%
- Final Corrective Measures Study 65%

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Perform semi-annual groundwater sampling and analysis for all permanent monitoring wells April 2018 and prepare necessary reports.
- Perform additional investigation if determined necessary.
- Initiate Surface Debris Cleanup Activities – TBD
- Revise the CMS based on the final BERA results and associated USEPA comments.
- Prepare summaries of meetings, data reviews, or conference calls with USEPA and respond to any comments on submittals received from USEPA - as appropriate.
- Prepare the Semi-Annual Progress Report for October 1, 2018 through April 1, 2018 – September 30, 2018.