



April 16, 2015

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 2014 through March 2015)
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, 2014 through March 31, 2015. 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,

A handwritten signature in blue ink, appearing to read 'Francis J. Biehl', is written over the typed name.

Francis J. Biehl, PE
Project Manager

Attachment A – Semi-Annual Progress Report (October 2014 – March 2015)

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, 2014 to March 31, 2015

WORK PERFORMED THIS PERIOD

- Conducted soil boring and monitoring well installation at three locations (i.e. at MW-30 and MW-32 on the north side of the Michigan Avenue ROW and MW-27 within the Van Buren Landfill as depicted on Figure 7 *Proposed Phase IV Investigation* of the Phase III Site Investigation Report (Phase IV Investigation)– December, 2014
- Conducted surficial soil (0 to 2 feet bgs) sample collection, compositing, processing and chemical analysis in accordance with Incremental Sampling Methodology (ITRC 2012) and Section 5.4 of the Ecological Risk Assessment – Steps 1 to 4 of USEPA Ecological Risk Assessment Process prepared by subconsultant Anchor QEA and dated August 2014 – December 2014 thru February 2015
- Began preparation of Ecological Risk Assessment – Steps 5 to 8 of USEPA Ecological Risk Assessment Process (in progress by Anchor QEA)
- Conducted ground water sampling and analysis of the additional permanent monitoring wells MW-30 and MW-32 (only hydrostatic measurements obtained at MW-27) installed during the Phase IV activities – February 2015
- Conducted semi-annual ground water sampling and analysis of all of the permanent monitoring wells installed during the Phase I thru IV investigation activities – March 2015
- Conducted ground water sampling and analysis of monitoring well CRA-266M located in the northeastern portion of the RACER Trust Willow Run site in conjunction with the semi-annual ground water sampling and analysis. Also obtained hydrostatic/ground water level measurements at monitoring wells CRA-265M, CRA-833M and CRA-834M located in the northern part of the RACER Trust Willow Run site – March 2015
- Worked with General Motors LLC to finalize an access agreement that allows for monitoring wells to be installed on GM property located east of the Site (the agreement is in final sign off at GM LLC)
- 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 will be included in future reports.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

Resistance and rejection to site access from Detroit Water and Sewer Department (DWSD) and Willow Run Airport property owners, respectively, in support of the Phase IV Investigation delineation of ground water impacts efforts on the south side of Van Buren Landfill. Follow-up contact with Willow Run Airport is planned. Monitoring well CRA-266M on RACER Willow Run property to be used in lieu of proposed MW-28. Monitoring well MW-29 potentially to be installed within the south side Ecorse Road ROW directly south of existing monitoring well MW-17 (which is located in the southeastern corner of the Van Buren Landfill) if access to Willow Run Airport will not be granted. Wayne County ROW permit application is in process. This work will be performed with the understanding that

ground water impacts (i.e. delineation to concentrations below Part 201 residential health-based drinking water standards) may not be completed.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- Current Conditions Report 100%
CRA submitted Draft Report to the USEPA - October 2011
Approved by USEPA during a conference call - November 21, 2011
- Performance-Based Administrative Order on Consent 100%
Effective September 29, 2011
- 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
Including proposed delineation investigation Phase IV (submitted September 4, 2014) 100%
- Phase IV Site Investigation Field Work
In Progress (Completion TBD, approximately May 2015) 35%
- Phase IV Site Investigation Report
To also include groundwater monitoring results (Completion TBD, approximately June 2015) 0%
- Ecological Risk Assessment, steps 1 to 4 (submitted September 8, 2014) 100%
- Ecological Risk Assessment (Anchor QEA, with MSG support), steps 5 to 8
In Progress (Completion TBD, approximately April 31, 2015) 75%
- RFI Summary Report (Completion TBD, approximately June 2015) 35%
- Contaminated Groundwater Migration under Control EI (CA750)
(Due June 15, 2015) 50%
- Corrective Measures Proposal
(Due September 30, 2015) 35%

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Obtain access agreement with General Motors and possibly Willow Run Airport for proposed soil borings/monitoring wells (Phase IV) – April 2015
- Complete Phase IV Site Investigation activities – June 2015 (depends on obtaining off-site access)
- Complete Ecological Risk Assessment steps 5 to 8 –April2015
- Perform groundwater sampling and analysis for all permanent monitoring wells – September 2015
- Prepare and submit Phase IV and groundwater monitoring report –May 2015
- Prepare Contaminated Groundwater Migration under Control EI (CA750) Report –April - June2015
- Prepare Corrective Measures Study – April - September, 2015
- Prepare summaries of meetings, data reviews, or conference calls with USEPA - as appropriate
- Prepare the Semi-Annual Progress Report for April 1, 2015 through September 30, 2015 - October 2015