

Transmitted via E-mail

July 13, 2015

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

ENVIRONMENT

Subject:

Performance Based Administrative Order on Consent, Docket No. RCRA-5-2011-0019
Semi-Annual Progress Report, January 2015 – June 2015
RACER Trust Pontiac North Campus
Pontiac, Michigan

Date:

July 13, 2015

Contact:

Christi Kiker

Phone:

517.324.5044

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Our ref:

B0064607.2015

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, percent complete, project schedule, and problems encountered for the period from January 1, 2015 through June 30, 2015 for the portions of the Pontiac North Campus (PNC or the Site) for which RACER Trust is responsible for remediation.

Work Performed From January 1, 2015 through June 30, 2015

- Received USEPA approval of the 2015 PCB Delineation Work Plan on March 31, 2015. Soil and LNAPL PCB delineation activities were performed in AOIs M-2, and LNAPL Areas 2A, 2B, and 1/7 from April through May 2015. During this time period 11 soil boring locations were sampled and 9 temporary wells were installed for a total of 83 soil boring locations and 75 temporary wells installed in 2014 and 2015. Four LNAPL samples were collected in June 2015. A total of 25 LNAPL samples were collected and analyzed for PCBs from June 2014 through June 2015. A draft PCB Investigation summary memo was submitted on February 6, 2015. Updates to the PCB Investigation summary memo were started.

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- Submitted Final 2013/2014 LNAPL Investigation Technical Memo to USEPA on January 30, 2015 summarizing the work conducted in 2013 and 2014 to further characterize LNAPL onsite.
- Performed inspections of potential ice buildup on Montcalm in the vicinity of the ponded water in February. No buildup of ice was observed.
- Performed groundwater sampling events on the Seep wells along Montcalm in February, April and May 2015 and began preparation of a summary memo.
- Submitted to the USEPA on February 9, 2015, the Montcalm Ave Seep Assessment Memo which summarized the 2014 investigation activities to characterize the groundwater seep along the Montcalm Avenue right-of-way near the southern boundary of the Site.
- Installed approximately 12 inches of aggregate material over an approximately 600 feet portion of the sidewalk along the north side of Montcalm Ave in May 2015 in order to mitigate ponded water on the sidewalk caused by the Seep.
- Accompanied MDEQ Hazardous Waste Section representative during an April 15, 2015, inspection of 2 former waste management units (WMUs) on the adjacent former Fiero property. The WMUs are currently being managed under the RCRA corrective action process and are addressed in the Fiero Focused CMS.
- Continued support for property transactions (ongoing).
- Submitted the Draft Fiero Focused Corrective Measures Study to USEPA on April 21, 2015. Reviewed the Draft Fiero CMS with USEPA on June 24, 2015. Submitted the Final Fiero CMS on July 1, 2015.
- Submitted *Draft* Interim Measures Work Plan – TSCA Soil Cap to USEPA on May 13, 2015. The work plan proposes to utilize the existing above-grade soil pile as an interim cap and provides for a portion of the soil pile to remain as the final cap should some of the soil pile be removed.

Data Collected

Soil sampling, LNAPL and additional groundwater sampling data was collected and will be included in separate data report submittals.



Estimated Percent Complete

Project Management

On-going

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 Corrective Measures Study (7/1/15) 99%
- Revised Draft CMP 70%

Corrective Measures – Institutional Controls

- Draft Deed Restrictions 20%

Corrective Measures – Soil

- AOI M-27 soil delineation completed (March 2013) 100%
- AOI M-27 arsenic-impacted soil removal (December 2013) 100%
- *Draft* Interim Measures Work Plan – TSCA Soil Cap (5/13/15) 90%
- TSCA soil cap construction (TBD) 0%

Corrective Measures – Groundwater/LNAPL

- LNAPL investigation on USPS property completed (Sep-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%
- 2014 Draft PCB Investigation summary memo submitted (2/6/2015) 100%



- Additional PCB LNAPL Delineation (April-June 2015) 100%
- Final PCB Investigation summary memo (TBD) 95%

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 monitoring event (September 2015) 0%

Storm Sewers

- Montcalm toe drain swale construction (February 2012) 100%
- Sewer bulkheading activities completed (April 2012) 100%
- Swale/sidewalk construction (September 2012) 100%
- Montcalm discharge investigation completed (July-Sep 2013) 100%
- Stormwater Discharge Request submitted to City of Pontiac (Oct 2013) 100%
- Montcalm Discharge Feasibility Study/Data Collection (Jan - June 2015) 95%
- Montcalm Ave Seep Assessment Memo (submitted on February 9, 2015) 100%
- Montcalm Avenue Seep Remedy Evaluation (on-going) 70%

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%
- Proposed corrective measures for Fiero WMUs as included in the Fiero Focused CMS (July 2015) include deed restrictions to prohibit the use of groundwater, limit the use of the property to non-residential, and require soil management in accordance with Michigan regulations.
- Proposed corrective measures for the USPS WMU in the PNC CMS will include deed restrictions to 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. 100%

Project Schedule – Work to be completed during next reporting period

A task based Gant chart for the 2015 Project Schedule is attached.

Items scheduled to be completed during the next reporting period

ARCADIS

- Respond to and finalize RFI report after receipt of any USEPA comments.
- Complete and submit revised Draft CMP report for agency review (update to account for new LNAPL data/PCB Delineation).
- Submit Final PCB delineation results to USEPA.
- Prepare and submit a Montcalm Seep remedy evaluation (focused CMS). Upon USEPA approval, begin design, work plan, permitting (if needed) and procurement activities.
- Complete 2015 Annual groundwater monitoring event, prepare and submit report.
- Prepare and submit any needed budget amendments.

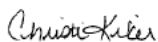
Problems Encountered

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 L. Kiker, P.E.
Certified Project Manager

Attachment:
2015 Project Schedule

Copies:
Dan Dailey, MDEQ
Grant Trigger, RACER
Dave Favero, RACER
Derek Kaiding, ARCADIS
File

ID	Task Name	Duration	Start	Finish	Predecessors	2014	January 2015	February 2015	March 2015	April 2015	May 2015	June 2015	July 2015	August 2015	September 2015	October 2015	November 2015	December 2015														
						12/21	1/4	1/18	2/1	2/15	3/1	3/15	3/29	4/12	4/26	5/10	5/24	6/7	6/21	7/5	7/19	8/2	8/16	8/30	9/13	9/27	10/11	10/25	11/8	11/22	12/6	12/20
1	Pontiac North Campus/Fiero	252 days	Mon 1/5/15	Fri 12/25/15		[Summary bar]																										
2	TASK 1 - Project Management	250 days	Thu 1/1/15	Mon 12/21/15		[Summary bar]																										
15	Prepare & Submit 2016 Budget Authorization	60 days	Tue 9/1/15	Tue 11/24/15		[Task bar]																										
16	TASK 2 - Corrective Action (General)	258 days?	Mon 1/5/15	Wed 1/6/16		[Summary bar]																										
17	Semi-Annual Progress Report	134 days	Mon 1/5/15	Fri 7/10/15		[Task bar]																										
20	Finalize RFI	90 days	Mon 7/13/15	Mon 11/16/15		[Task bar]																										
21	Draft Fiero FCMS submittal	1 day?	Tue 4/21/15	Tue 4/21/15		[Milestone: 4/21]																										
22	Final Fiero FCMS submittal	0 days	Wed 7/1/15	Wed 7/1/15		[Milestone: 7/1]																										
23	Update PNC CMS	120 days	Mon 4/6/15	Tue 9/22/15		[Task bar]																										
24	Draft CMS Submittal to RACER/Review	30 days	Fri 9/25/15	Thu 11/5/15		[Task bar]																										
25	Draft CMS Submittal to USEPA	1 day?	Fri 11/6/15	Fri 11/6/15	24	[Milestone: 11/6]																										
26	Property Transaction Support	258 days?	Mon 1/5/15	Wed 1/6/16		[Task bar]																										
27	TASK 3 - Corrective Measures Institutional Controls	258 days?	Mon 1/5/15	Wed 1/6/16		[Summary bar]																										
28	TASK 4 - Corrective Measures - Soil	130 days?	Mon 1/5/15	Mon 7/6/15		[Summary bar]																										
29	Annual RCRA Cap Inspection	1 day	Mon 7/6/15	Mon 7/6/15		[Milestone]																										
30	Soil Pile Relocation Options Eval	90 days	Mon 1/5/15	Fri 5/8/15		[Task bar]																										
31	Draft TSCA Soil Cap Work Plan submittal	1 day?	Wed 5/13/15	Wed 5/13/15		[Milestone: 5/13]																										
32	TASK 5 - Corrective Measures - Groundwater / LNAPL	159 days?	Fri 1/30/15	Fri 9/11/15		[Summary bar]																										
33	LNAPL Investigation Tech Memo submittal	0 days	Fri 1/30/15	Fri 1/30/15		[Milestone: 1/30]																										
34	Draft PCB Delineation Summary submittal to USEPA	0 days	Fri 2/6/15	Fri 2/6/15		[Milestone: 2/6]																										
35	Additional PCB Delineation field activities	60 days	Mon 3/16/15	Mon 6/8/15		[Task bar]																										
36	Final PCB Delineation Summary submittal to RACER for review	15 days	Fri 8/14/15	Thu 9/3/15		[Task bar]																										
37	Final PCB Delineation Summary submittal to USEPA	1 day?	Fri 9/11/15	Fri 9/11/15	36	[Milestone: 9/11]																										
38	TASK 6 - Groundwater Monitoring	65 days	Mon 9/21/15	Mon 12/21/15		[Summary bar]																										
39	Annual Groundwater Sampling	5 days	Mon 9/21/15	Fri 9/25/15		[Task bar]																										
40	Prepare & Submit 2015 report	60 days	Mon 9/28/15	Mon 12/21/15	39	[Task bar]																										
41	Task 7 - Storm Sewers	240 days?	Fri 1/2/15	Tue 12/8/15		[Summary bar]																										
42	Montcalm Drainage Inspections (as necessary)	64 days?	Fri 1/2/15	Wed 4/1/15		[Task bar]																										
43	Seasonal Groundwater Sampling	67 days	Mon 2/2/15	Tue 5/5/15		[Task bar]																										
46	Permitting/USEPA Work Plan Development/Design Refinement	60 days	Mon 7/13/15	Mon 10/5/15		[Task bar]																										
47	Procurement	45 days	Tue 10/6/15	Tue 12/8/15	46	[Task bar]																										

Project: PNC 2015 Schedule Date: Mon 7/13/15	Task		Project Summary		Inactive Milestone		Manual Summary Rollup		Progress	
	Split		External Tasks		Inactive Summary		Manual Summary		Deadline	
	Milestone		External Milestone		Manual Task		Start-only			
	Summary		Inactive Task		Duration-only		Finish-only			