

Transmitted via E-mail

January 12, 2015

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: Second Half 2014 Progress Report
Performance-Based Administrative Order on Consent
RCRA Corrective Action
Flint West Facility
Flint, Michigan
USEPA ID No. MIK204011722^A

Dear Mr. Black:

In accordance with paragraph 24.b. of the Performance-Based Administrative Order on Consent, Docket No. 05-2011-0021 (AOC), 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 the second half of 2014 (July 1, 2014 through December 31, 2014).

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

Sincerely,



Michael Smith
Technical Services Manager

A - Note that this facility is identified as USEPA ID No. MID005356654 in the Administrative Order on Consent for this facility. However the correct USEPA ID no. is MIK204011722.

Attachment A - Second Half 2014 Progress Report

C: Grant Trigger, RACER
David Favero, RACER

ATTACHMENT A
SECOND HALF 2014 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
FLINT WEST FACILITY - #12990, FLINT, MICHIGAN
July 1, 2014 to December 31, 2014

WORK PERFORMED THIS PERIOD

- Submitted the First Half 2014 Progress Report to USEPA on July 11, 2014.
- Completed a Data Report on October 3, 2014, which summarized the following investigations.
 - Gauged all wells in June, 2014. No NAPL was encountered.
 - Sampled all wells in June, 2014. Samples were analyzed for VOCs, and the following metals (total and dissolved): arsenic, chromium, copper, lead, selenium, and zinc.
 - Installed two soil borings and collected five soil samples (excluding QA/QC samples) in July 2014. Soil samples were collected from various depths between 12 feet and 20 feet below grade. Samples were analyzed for VOCs, and select samples were also analyzed for Synthetic Precipitation Leachate Procedure (SPLP) – VOCs, dry bulk density, and fraction of organic carbon (FOC).
 - Received (from AKT Peerless) and reviewed monitoring well sampling data from the Chevy-in-the-Hole site for the April, 2014 monitoring event.
- Submitted a draft Corrective Measures Proposal (CMP) USEPA on November 1, 2014.
- Gauged and sampled all wells in December, 2014. No NAPL was encountered. Samples were analyzed for VOCs, and the following metals (total and dissolved): arsenic, chromium, copper, lead, selenium, and zinc.
- Installed four soil borings and collected eight soil samples (excluding QA/QC samples) in December 2014. Soil samples were collected from various depths between 18 feet and 21 feet below grade. The samples were collected in the clay layer overlying the bedrock in the abandoned railway to the north to further characterize the extent of soil contamination. Samples were analyzed for VOCs and the following metals: arsenic, chromium, copper, lead, selenium, and zinc.

DATA COLLECTED THIS PERIOD

Groundwater Monitoring

- Data for wells gauged and sampled in June, 2014 was submitted in the September, 2014 Data Report.
- Wells were gauged and sampled in December, 2014. Samples were analyzed for VOCs, and the following metals (total and dissolved): arsenic, chromium, copper, lead, selenium, and zinc. The data will be submitted in a Data Report in January, 2015.

Additional Soil Investigations

- Analytical data for the eight samples collected from four soil borings completed in December, 2014 will be submitted in a Data Report in January, 2015.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

- No problems were encountered.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- RFI Phase II Sampling Matrix Preparation and Fieldwork Implementation (Proposed 2012 activities) 100%

The 2012 portions of the proposed Phase II investigation included in the June 26, 2012, Phase I Data Report were completed and included the completion and sampling of 13 soil borings, eight of which were finished as monitoring wells. Soil and groundwater samples (from the 8 new and 5 previously-installed monitoring wells) were collected and were analyzed for ten MDEQ Metals including Chromium VI, VOCs (USEPA 8260), and PNAs (USEPA 8310).
- RFI Phase II Data Report Preparation 100%
(Submitted February 12, 2013)
- Human Health EI (CA725) Report 100%
(Submitted July 1, 2013)
- Data Report Preparation 100%
(Additional investigations and groundwater monitoring)
(Submitted July 9, 2013)

- Data Report Preparation 100%
(Additional well installation and groundwater monitoring)
(Submitted October 12, 2013)
- Groundwater Migration under Control EI (CA750) 100%
(Submitted March 1, 2014)
- Data Report Preparation 100%
(Groundwater monitoring)
(Submitted March 18, 2014)
- Data Report Preparation 100%
(April 2014 additional investigations and groundwater monitoring)
(Submitted June 23, 2014)
- Data Report Preparation 100%
(June 2014 groundwater monitoring and July 2014 additional soil investigations)
(Submitted October 3, 2014)
- Corrective Measures Proposal 100%
(Submitted November 1, 2014)
- Data Report Preparation 25%
(December 2014 additional soil investigation and groundwater monitoring)
(To be submitted January, 2015)

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Prepare and submit a Data Report for the December, 2014 soil investigations and well sampling. (January 2015)
- Review, discuss and respond to any USEPA comments on the draft Corrective Measures Proposal.
- A Corrective Measures Implementation (CMI) Work Plan will be submitted within 90 days of approval of the selected corrective measures alternative. The CMI Work Plan will include a draft Declaration of Restrictive Covenant, details for the HRC injection, details for groundwater monitoring, and an implementation schedule. (Depending on the schedule of USEPA's review of the CMP, these activities may be conducted in the second half of 2015.)
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, and Data Report(s), as appropriate.