

Transmitted via E-mail

Mr. Nate Nemani
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Subject:

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

ENVIRONMENT

Date:

July 13, 2017

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 January 1, 2017 through June 30, 2017 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, 2017 through June 30, 2017

- Submitted Semi-Annual Progress Report to USEPA on January 16, 2017.
- The Request for RCRA Corrective Action Complete with Controls (CACC) Determination Former Storm Water Retention Facility (aka the Duck Pond) A

Portion of Pontiac North Campus – MID005356886 was submitted to USEPA on January 6, 2017.

- Reviewed Parcel 14-20-276-001 data package, draft DRC and draft CMS LNAPL/PCB cross sections with USEPA on February 24, 2017. Hard copy of data package, cross sections and draft soil cap IM work plan were submitted to USEPA on March 1, 2017.
- The 1,4-D Supplemental Scope of Work was submitted to USEPA on March 28, 2017. USEPA approved via email on March 28, 2017.
- Completed field activities for the 1,4-D Supplemental Scope of Work (well installation/sampling/gauging) in April 2017.
- Based on the results of the 2016 annual groundwater monitoring, additional vinyl chloride sampling in the former Plant 25 area was conducted in April 2017.
- Conducted additional groundwater sampling of seep wells for analysis of geochemistry parameters to aid in remedy option analysis in April 2017.
- Continued revision/update of the Draft Corrective Measures Study.
- Reviewed Draft Seep Corrective Measures Study with USEPA on May 11. Submitted draft presentation to USEPA on May 11, 2017.
- Submitted Parcel 14-20-276-001 Well Abandonment Request to USEPA on May 4, 2017 and the request was approved via email on May 23, 2017.
- Continued seep remedy options analysis, focusing on injection well system with possible infiltration gallery or sprinkler application.
- Continued support for property transactions.

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%
- 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 (submittal estimated August 2017) 85%

Corrective Measures – Institutional Controls

- Draft Deed Restrictions 30%
- Recorded USEPA and MDEQ approved restrictive covenant for the Duck Pond property (Nov 2016/ Montcalm Street) 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%

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 (submittal estimated August 2017) 90%

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 (submittal estimated July 2017) 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 Avenue Seep Remedy Evaluation (Mar 2015 - ongoing) 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%
- 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 and revised Draft PNC CMS. 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. 100%

Project Schedule – Work to be completed during next reporting period

A task based Gant chart for the 2017 Project Schedule is attached.

Items scheduled to be completed during the next reporting period:

- Complete and submit Supplemental 1,4-Dioxane Investigation Summary Report.
- Complete and submit revised Draft PNC CMS (update to account for groundwater, LNAPL and soil vapor data collected in 2016 and 2017).
- Complete and submit Montcalm Seep IM Work Plan, begin permitting, procurement and construction activities.
- Complete and submit annual groundwater monitoring addendum (vinyl chloride sampling)
- USPS WMU inspection coordination.
- Annual inspection of the existing soil caps and maintenance (if necessary).
- Supplemental 1,4-Dioxane sampling activities (quarterly well sampling in July and October)
- Complete Parcel 14-20-276-001 well abandonment

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- Prepare and submit any needed budget amendments.

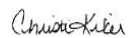
Problems Encountered

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

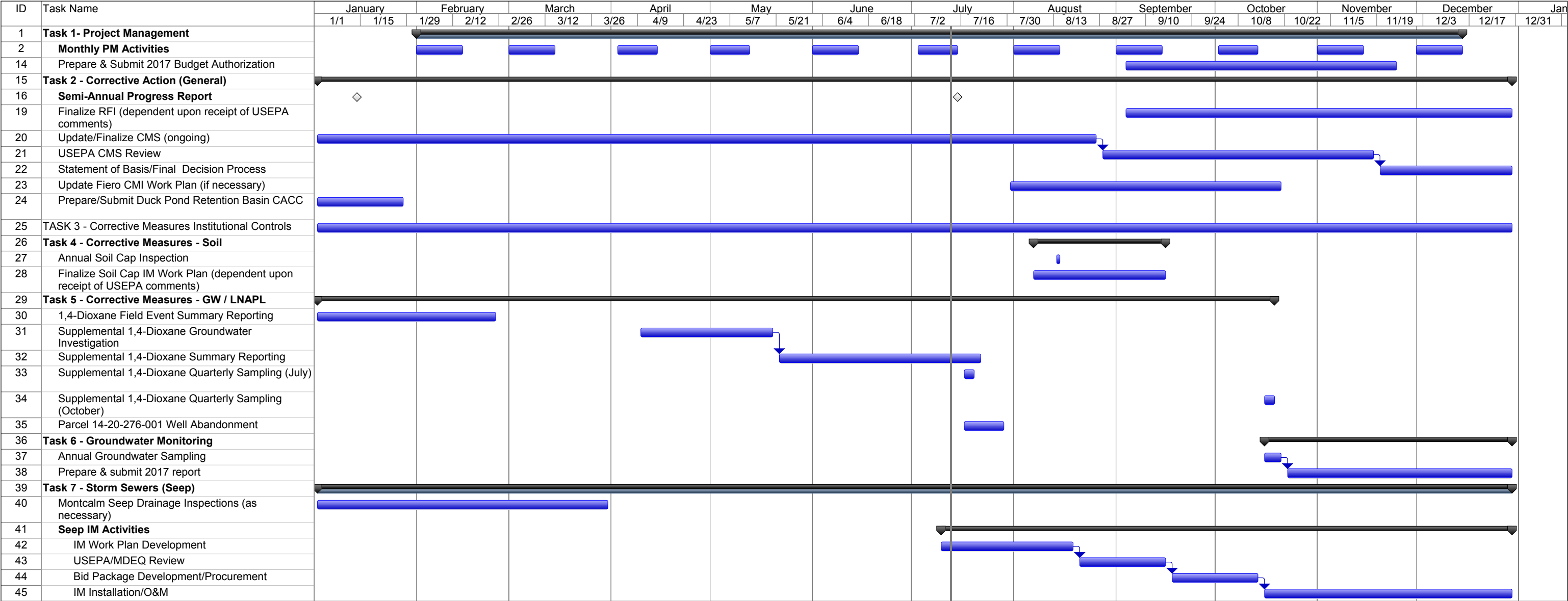
1 2017 Project Schedule

Copies:

Dan Dailey, MDEQ

Dave Favero, RACER

File



Project: PNC 2017 Schedule
Date: Thu 7/13/17

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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