

Mr. Peter Ramanauskas
U.S. Environmental Protection Agency Region 5
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Subject:

Semi-Annual Progress Report, July 2020 – December 2020
Performance Based Administrative Order on Consent
Docket No. RCRA-5-2011- 0019; RACER Trust Pontiac North Campus
Site 11970 - MID 005 356 886, MID 085 470 102 & MID 005 356 910
Pontiac, Michigan

ENVIRONMENT

Date:

January 14, 2021

Dear Mr. Ramanauskas:

Contact:

Brad Saunders

This progress report has been prepared in accordance with Section VI (24b) of the Administrative Order of Consent (AOC; 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 July 1, 2020 through December 31, 2020 for the portions of the Pontiac North Campus (PNC or Site) for which RACER Trust is responsible for remediation.

Phone:

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Our ref:

30075936.00002

Work Performed from July 1, 2020 through December 31, 2020
(Includes references to reports which provide relevant details and data collected)

- Completion of field implementation of the USEPA-approved Interim Measures Work Plan (IMWP) for the PCB-impacted soil risk-based disposal and cleanup notification at AOI W-1. Activities during the period included re-vegetation of the PCB cap areas and backfill source area, inspection and closure of the Soil Erosion and Sediment Control permit by the Oakland County Water Resources Commissioner on July 15, 2020. Completion and submittal of a draft completion report to USEPA on October 2, 2020.
- Continued recovery of LNAPL and performed associated O&M activities at RW-08-14 through July 2020, and then performed a planned shutdown of the recovery system on August 3, 2020 to let LNAPL accumulate for continued removal feasibility testing. To assess the effectiveness of conducting future recovery activities, conducted LNAPL transmissivity testing at RW-08-14 and

three other monitoring well locations (TW-11-01, TW-11-02, and SB-25-14) from November 2-4, 2020. The results are being documented in a memo report. On November 12, 2020, shipped gallons of liquid TSCA waste off-site for treatment and disposal at Clean Harbors Deer Park, LLC facility in La Porte, Texas.

- Facilitated conduction of EGLE focused Corrective Action inspection of the Site on July 27, 2020 for RACER under MID 005 356 886. Based on EGLE's initial feedback and requests during the audit, addressed the following items: provided additional location details pertaining to the location of Fiero WMUs (07/27/20); provided construction details on Montcalm Street monitoring well TW-ROW-02 (07/28/20); provided a comprehensive list and coordinate set for all current monitoring wells at the Site (08/07/20); provided documentation of repair for leaking Montcalm Seep Control system clean-out piping/vaults (08/24/20); provided documentation of repair for three observed damaged monitoring wells (08/26/20). EGLE issued an inspection report on September 23, 2020 documenting the results of the inspection and indicating that corrective action documentation had been received and was sufficient for identified findings.
- Implemented the Fiero Property VI Well Installation Scope of Work (SOW) approved by USEPA and EGLE on May 7, 2020. Installed two new on-site monitoring wells (MW-06-20 and MW-07-20) from July 20-22, 2020. Obtained a Right-Of-Way (ROW) permit from the City of Pontiac issued on July 31, 2020, and installed two off-site monitoring wells (MWOS-08 and MWOS-09) in the East Kennett Road ROW and St. Clair Street ROW from August 24-25, 2020. Surveyed and sampled the monitoring wells from August 31 through September 2, 2020. Prepared a draft report and submitted to USEPA and EGLE for review on October 9, 2020. Addressed EGLE questions and comments on November 5, 2020, and conducted a second groundwater monitoring event from December 7-9, 2020. An updated draft report is being prepared for USEPA and EGLE review.
- Conducted intrusive well search activities for seven missing monitoring wells unable to be located on the Fiero properties, and documented the results of the activities in a December 18, 2020 memo report submitted to USEPA. Abandoned four Fiero property monitoring wells approved for abandonment by USEPA, and submitted documentation of abandonment activities in a December 18, 2020 memo report submitted to USEPA.
- Planned and completed the 2020 annual groundwater monitoring event from October 12-16, 2020. Commenced preparation of the 2020 Annual Groundwater Monitoring Report scheduled for completion in early 2021.
- Completed preparation of the Montcalm Seep Control System Completion Report, and submitted to USEPA on July 15, 2020. Completed preparation of a Montcalm IM Monitoring Report, and submitted to USEPA on September 10, 2020. Conducted routine O&M associated with the Montcalm Street Seep Control system from July through December 2020; seepage of groundwater from the Site onto Montcalm Street was successfully prevented during this timeframe.
- Initiated evaluation of potentially discharging groundwater extracted from the Montcalm sump into the nearby storm sewer system via an NPDES permit, and engaged in initial discussions with EGLE regarding this alternative for long term management of Montcalm Seep Control system groundwater.
- Continued support and coordination with existing property owners and to facilitate transactions with prospective new property owners.
- Provided an updated draft DRC for the USPS parcel to EGLE for review on August 13, 2020 which incorporated USEPA and EGLE comments made on a prior draft versions, and received approval

from EGLE on September 9, 2020 for the revised draft DRC. Recording of a restated DRC for the USPS parcel is pending a property transfer to the USPS, which has been delayed.

- Conducted preliminary desktop historical review activities for two RACER-owned parcels located at the southeast corner of the intersection between of Joslyn Ave and Le Baron Ave and the northeast corner of the intersection between Joslyn Ave and Lenox Ave, respectively. A request for USEPA determination on whether or not the parcels are subject to RCRA Corrective Action requirements was submitted by RACER on September 15, 2020. On October 26, 2020, USPEA notified RACER that based on its review and correspondence with EGLE, the parcels were not subject to RCRA Corrective Action. Subsequently USEPA identified that the parcels could be addressed pursuant to the existing AOC pursuant to USEPA approval of the 2021 Annual Budget for the Site, which included budget for completing investigation of these parcels, and the parcels would still not be subject to RCRA Corrective Action requirements. Based on the identification of potential environmental risks at the parcels, prepared a draft Scope of Work (SOW) for proposed subsurface investigation activities, review of which is pending determination of acceptable approach.

Data Collected

Data collected relevant to the Work Performed described above is included in the applicable report submittals.

Estimated Percent Complete

Project Management	Ongoing
Corrective Action – General	
• Current Conditions Report submitted to USEPA (11/25/11)	100%
• 2012 Budget Authorization approved by 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 by USEPA (9/19/12)	100%
• 2012 Budget Amendment 3 approved by USEPA (9/19/12)	100%
• 2013 Budget Authorization approved by USEPA (1/25/13)	100%
• Draft CMP Report submitted to USEPA (3/15/13)	100%
• 2013 Budget Amendment 1 approved by USEPA (7/18/13)	100%
• 2013 Budget Amendment 2 approved by USEPA (11/12/13)	100%
• 2014 Budget Authorization approved by USEPA (11/20/13)	100%
• 2014 Budget Amendment 1 approved by USEPA (5/23/14)	100%
• 2015 Budget Authorization approved by USEPA (11/20/14)	100%
• Fiero Focused CMS approved by USEPA (7/1/15)	100%
• Draft Fiero CMI Work Plan (10/7/15)	100%
• 2016 Budget Authorization approved by USEPA (11/20/15)	100%
• 2016 Budget Amendment 1 approved by USEPA (9/9/16)	100%
• 2017 Budget Authorization approved by USEPA (11/22/16)	100%
• 2018 Budget Authorization approved by USEPA (12/12/17)	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%
- Fiero CA 725 and 750 approved by USEPA (8/11/17) 100%
- Revised Draft PNC CMS submittal to USEPA (In progress) 85%
- 2018 Budget Amendment 1 approved by USEPA (07/18/18) 100%
- 2019 Budget Authorization approved by USEPA (11/23/18) 100%
- 2020 Budget Authorization approved by USEPA (12/20/19) 100%
- 2020 Budget Modification 1 approved by USEPA (2/3/20) 100%
- Corrective Action (CA) Summary Report (Draft In Progress) 90%
- 2021 Budget Authorization approved by USEPA (12/11/20) 100%
- Joslyn Parcel Investigation Activities (Not Included in RCRA CA) (In progress) 10%

Corrective Measures – Institutional Controls

- Declaration of Restrictive Covenants (DRCs) recorded for all Site parcels 60%
- Recorded USEPA and MDEQ approved DRC for the Duck Pond property (Nov 2016/ Montcalm Street) 100%
- Recorded DRC for the former Plant 14 South property (Nov 2017) 100%
- Recorded DRC for the USPS property (April 2018) 100%
- Obtained USEPA and EGLE approval of First Amended DRC for the Proastio Parcel (former Plant 14 South) and Railroad Parcels (4/17/2020) and Recorded (May 12, 2020) 100%
- Obtained USEPA and EGLE approval of First Amended DRC for USPS property and Record (content approved 9/9/2020, recording pending) 90%
- Obtained USEPA and EGLE approval of First Amended DRC for Duck Pond property and Record (draft submitted 8/26/2019) 90%

Corrective Measures – Soil

- AOI M-27 arsenic-impacted soil delineation completed (Mar 2013) 100%
- AOI M-27 arsenic-impacted soil removal (Dec 2013) 100%
- Draft Interim Measures Work Plan - TSCA Soil Cap (former Plant 14 south property) submitted to USEPA (5/13/15) 100%
- 2017 PCB Soil Delineation Summary Memo submitted to USEPA (02/27/17) 100%
- 2018 PCB Soil Delineation Summary Memo submitted to USEPA (05/08/18) 100%
- 2018 Additional PCB Soil Delineation Summary Memo submitted to USEPA (07/25/18) 100%
- PCB-impacted Soil Interim Measures Removal Work Plan approved by USEPA (7/10/19) 100%
- PCB-impacted Soil AOI W-1 IMWP Field Implementation (Nov 2019 – Jun 2020) 100%
- PCB-impacted Soil AOI W-1 IMWP Completion Report (draft submitted 10/02/20) 95%

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 to USEPA (1/30/15) 100%
- Draft PCB Investigation Summary Memo submitted to USEPA (2/6/15) 100%
- Additional PCB LNAPL Delineation Activities (Apr-June 2015) 100%
- Draft 2014-2015 PCB Investigation Summary Memo submitted to USEPA (8/17/15) 100%
- Supplemental Site (USPS Property) Characterization Summary Report submitted to USEPA (7/21/16) 100%
- Supplemental Soil Gas Data Evaluation Memo (USPS Property) submitted to USEPA (9/1/16) 100%
- Supplemental 1,4-Dioxane Investigation Summary Report submitted to USEPA (12/7/17) 100%
- LNAPL Interim Measures Feasibility Confirmation and Pre-Design Specification Testing memorandum submitted to USEPA (4/27/18) 100%
- Supplemental 1,4-Dioxane/VOC Groundwater Investigation Summary Report submitted to USEPA (6/13/18) 100%
- Additional LNAPL Pre-Design / Transmissivity Testing and Interim Measures Removal Work Plan submitted to USEPA (8/27/18) 100%
- Supplement to June 13, 2018 1,4-D/VOC Memo Report; Evaluation of Groundwater Data Compared to USEPA Screening Levels (1/9/19) 100%
- LNAPL Interim Measures Removal Implementation at RW-08-14 (May 2019) 100%
- LNAPL Recovery, Operations & Maintenance at RW-08-14 (Evaluation Report Pending) 90%
- Duck Pond Summary for GSI Pathway Determination submitted to USEPA (6/18/19) 100%
- 2019-2020 Duck Pond GW Investigation Memo submitted to USEPA (4/7/20) 100%
- LNAPL Recovery System Completion Memo Report (4/28/20) 100%
- Fiero Property VI USEPA/EGLE-Approved SOW Field Implementation (9/2/20) 100%
- LNAPL November 2020 Tn Testing Memorandum Report (In Progress) 75%
- Fiero Property VI Investigation (First Draft Report Submitted 10/9/2020, Follow-up quarterly monitoring in Progress) 25%

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%
- 2017 Annual Groundwater Report submitted to USEPA (2/30/18) 100%
- Well Abandonment Request submitted to USEPA (3/7/18) 100%
- Groundwater Monitoring Program Modification Request submitted to USEPA (8/27/18) 100%
- 2018 Annual Groundwater Report submitted to USEPA (1/29/19) 100%
- 2019 Annual Groundwater Report submitted to USEPA (2/18/20) 100%
- Fiero Properties Well Locating Memo Report (12/18/20) 100%
- Fiero Properties Well Abandonment Memo Report (12/18/20) 100%

- 2020 Annual Groundwater Monitoring Event (Complete) & Report (In Process) 60%

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 Seep IM Work Plan submitted to USEPA/MDEQ (11/10/17) 100%
- Montcalm Injection Test Summary Memo Report submitted to USEPA/MDEQ (1/31/18) 100%
- Montcalm Seep Interim Measures Revised Work Plan submitted to USEPA/MDEQ (4/13/18) – MDEQ Approval (6/8/2018), USEPA Approval (6/25/18) 100%
- Montcalm Seep Interim Measures Implementation (June 2019) 100%
- Montcalm Seep Control System Operation, Maintenance & Monitoring Ongoing
- Fiero Summary of Former VOC Detections Memo Report submitted to USEPA (3/3/20) 100%
- Montcalm Seep Control System Completion Memo Report submitted to USEPA (07/15/20) 100%
- Montcalm IM Monitoring Report submitted to USEPA (09/10/20) 100%
- Montcalm Seep NPDES Permit Discharge Application (Under Preparation) 15%

Former RCRA Hazardous Waste Management Units (WMUs). Includes Fiero property WMU AOI F-3 (southern Fiero former hazardous waste drum storage pad), Fiero property AOI F-6 (northern Fiero former Plant 17 tank farm), and USPS property WMU AOI W-2 (west yard former hazardous waste storage)

- 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. 100%
- Proposed corrective measures for WMUs (site-wide deed restrictions) incorporated into Fiero Focused CMS (USEPA approved on 7/1/15) and revised Draft PNC CMS (to be submitted). 100%
 - Anticipated deed restrictions will prohibit the use of groundwater, limit the use of the property to non-residential, and require soil and soil vapor 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. No violations or comments. 100%
- MDEQ Waste Management Division inspection of 2 former waste management units (WMUs) on the Fiero property on October 25, 2017. No violations or comments. 100%

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January 14, 2021

- EGLE Waste Management Division focused Corrective Action inspection (07/27/20) and Completion of Responses (08/26/20) 100%

Project Schedule – Work to be Completed During Next Reporting Period

A task-based Gant chart for the 2021 Project Schedule is attached. Items scheduled to be completed during the next reporting period:

- Complete preparation and updates to the CA Summary Report and submit draft to USEPA. Based on USEPA review of the draft report, address comments and questions as appropriate to pursue finalization of the report.
- Complete a draft and final memorandum report with recommendations for November 2020 LNAPL transmissivity testing conducted at RW-08-14 and three other monitoring well locations where LNAPL was accumulating.
- Finalize the PCB IM Completion Report for impacted soil removal at AOI W-1 upon receipt and responding to USEPA review comments.
- Continue monitoring of groundwater on-site and off-site as follow-up to findings from implementation of activities proposed in the USEPA and EGLE-approved Fiero Property VI SOW. Continue reporting of results with recommendations to USEPA and EGLE.
- Complete a draft report for the 2020 annual groundwater monitoring event conducted in October 2020, address USEPA comments and questions as relevant, and finalize the report.
- Continue Montcalm Seep Control System IMWP operation, monitoring and maintenance activities. Continue evaluating NPDES permit process with EGLE for potential discharge of extracted groundwater through the City of Pontiac storm sewer system.
- Based on the status of property transfer activities, finalize and record a First Amended DRC for the USPS parcel.
- Continue follow-up activities with USEPA and EGLE pertaining to the January 6, 2017 RCRA Corrective Action Complete with Controls Determination request for the Duck Pond property. Based on the status of final decision process activities, finalize and submit an updated draft First Amended DRC for the Duck Pond parcel and follow-up with USEPA and EGLE as necessary to obtain approval and record the DRC.
- Resolve approach for investigating the Joslyn Parcels and complete investigation activities (Activities not Included in RCRA CA).
- Respond to any comments received from USEPA or EGLE on submittals or other matters.

Problems Encountered

No problems were encountered during the reporting period.

Should you have any questions on the information provided within this progress report, please feel free to contact David Favero with RACER Trust at dfavero@racertrust.org or 217-741-6235 or me.

Sincerely,

Mr. Peter Ramanauskas
U.S. Environmental Protection Agency
January 14, 2021

Arcadis of Michigan, LLC



Brad Saunders, PE (MI)
Principal Engineer

Copies:

Dan Dailey, EGLE
Dave Favero, RACER
File

Enclosure:

Attachment

1 2021 Project Schedule

ID	Task Name	Duration	Start	Finish	12/27	January 1 1/10	1/24	February 1 2/7	2/21	March 1 3/7	3/21	April 1 4/4	4/18	May 1 5/2	5/16	5/30	June 1 6/13	6/27	July 1 7/11	7/25	August 1 8/8	8/22	September 1 9/5	9/19	October 1 10/3	10/17	November 1 10/31	11/14	December 1 11/28	12/12	12/26
1	Task 1 - Project Management	263 days	Fri 1/1/21	Fri 12/31/21	[Summary Bar]																										
2	Monthly PM Activities	263 days	Fri 1/1/21	Fri 12/31/21	[Summary Bar]																										
15	Prepare, Submit & Obtain Approval of 2022 Budget Authorization	65 days	Thu 9/2/21	Tue 11/30/21	[Blue Bar]																										
16	Task 2 - Corrective Action (General)	263 days?	Fri 1/1/21	Fri 12/31/21	[Summary Bar]																										
17	Semi-Annual Progress Report Prep/Submittal for 2nd Half of 2020	11 days?	Fri 1/1/21	Fri 1/15/21	[Blue Bar]																										
18	Semi-Annual Progress Report Prep/Submittal for 1st Half of 2021	11 days	Thu 7/1/21	Thu 7/15/21	[Blue Bar]																										
19	Complete Preparation and Submit CA Summary Report to USEPA	36 days?	Fri 1/1/21	Fri 2/19/21	[Blue Bar]																										
20	CA Summary USEPA Follow-Up	71 days?	Mon 2/22/21	Mon 5/31/21	[Blue Bar]																										
21	Revise Draft CMS, Edit, Finalize & Submit to USEPA	129 days	Fri 1/1/21	Wed 6/30/21	[Green Bar]																										
22	Draft CMI Work Plan, Edit, Finalize & Submit to USEPA	153 days	Sat 5/1/21	Tue 11/30/21	[Green Bar]																										
23	Task 3 - Corrective Measures Institutional Controls	263 days?	Fri 1/1/21	Fri 12/31/21	[Summary Bar]																										
24	First Amended DRC to Duck Pond Parcel & Recording				[Summary Bar]																										
25	Task 4 - Corrective Measures - Soil	263 days?	Fri 1/1/21	Fri 12/31/21	[Summary Bar]																										
26	Perform Annual Tatro & USPS Cap Inspections	44 days	Wed 9/1/21	Sun 10/31/21	[Blue Bar]																										
27	Joslyn Avenue Parcel Soil Investigation Activities (Not CA)	89 days	Thu 4/15/21	Sun 8/15/21	[Green Bar]																										
28	Task 5 - Corrective Measures - GW / LNAPL	263 days?	Fri 1/1/21	Fri 12/31/21	[Summary Bar]																										
29	RW-08-14 LNAPL Recovery System O&M (Need/Schedule TBD)				[Summary Bar]																										
30	RW-08-14 Decommissioning if Warranted (Schedule TBD)				[Summary Bar]																										
31	USPS Pkg Lot LNAPL Area 11 Well Abandonment & Installation (TBD)				[Summary Bar]																										
32	Fiero Property VI Quaterly GW Monitoring & Reporting	263 days?	Fri 1/1/21	Fri 12/31/21	[Blue Bar]																										
33	Joslyn Avenue Parcel GW Investigation Activities (not CA)	89 days	Thu 4/15/21	Sun 8/15/21	[Green Bar]																										
34	Task 6 - Groundwater Monitoring	263 days?	Fri 1/1/21	Fri 12/31/21	[Summary Bar]																										
35	Finalize & Submit 2020 Report	32 days?	Fri 1/1/21	Mon 2/15/21	[Blue Bar]																										
36	Annual Groundwater Sampling	5 days	Mon 10/11/21	Fri 10/15/21	[Blue Bar]																										
37	Preparation of 2021 Report	56 days	Mon 10/18/21	Fri 12/31/21	[Blue Bar]																										
38	Continued Well Repair, Protection and Abandonment Activities	199 days	Thu 4/1/21	Fri 12/31/21	[Blue Bar]																										
39	Task 7 - Storm Sewers (Seep)	263 days?	Fri 1/1/21	Fri 12/31/21	[Summary Bar]																										
40	Seep Control System OM&M & Reporting	263 days	Fri 1/1/21	Fri 12/31/21	[Blue Bar]																										
41	NPDES Permit Discussions with EGLE	129 days?	Fri 1/1/21	Wed 6/30/21	[Blue Bar]																										
42	Sewer Connection Tie-In Design and City of Pontiac Approval (TBD)				[Summary Bar]																										
43	Sewer Connection Tie-In Installation (TBD)				[Summary Bar]																										
44	Duck Pond CACC Finalization (Schedule TBD)				[Summary Bar]																										

RACER PNC/Fiero 2021 Schedule
Date: Thu 1/14/21

Task		Summary		External Milestone		Inactive Summary		Manual Summary Rollup		Finish-only	
Split		Project Summary		Inactive Task		Manual Task		Manual Summary		Progress	
Milestone		External Tasks		Inactive Milestone		Duration-only		Start-only		Deadline	