

Transmitted via E-mail

January 11, 2019

Mr. Brandon Pursel (pursel.brandon@epa.gov)  
U.S. Environmental Protection Agency, Region 5  
Land and Chemicals Division  
77 West Jackson Blvd., DE-9J  
Chicago, IL 60604-3590

RE: Second Half 2018 Progress Report  
Performance-Based Administrative Order on Consent  
RCRA Corrective Action  
Flint West Facility #12990  
Flint, Michigan  
USEPA ID No. MIK204011722<sup>A</sup>

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Dear Mr. Pursel:

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 2018 (July 1, 2018 through December 31, 2018).

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 2018 Progress Report

C: Grant Trigger, RACER  
David Favero, RACER

ATTACHMENT A  
SECOND HALF 2018 PROGRESS REPORT  
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT  
FLINT WEST FACILITY - #12990, FLINT, MICHIGAN  
July 1, 2018 to December 31, 2018

WORK PERFORMED THIS PERIOD

- Conducted the Hydrogen Release Compounds (HRC) injection step of the pilot test on July 2 and 3, 2018 on the Site and the adjoining GCP property.
- Submitted the First Half 2018 Progress Report to USEPA on July 12, 2018.
- Prepared and submitted a Data Report summarizing the May 2018 groundwater monitoring event, the June pre-HRC injection sampling, and the HRC pilot test injection to USEPA on July 27, 2018.
- Collected groundwater samples from monitoring wells MW-109S, MW-111S, MW-112S, MW-113S, and MW-114S on August 8 and 14, 2018.
- Sampled all monitoring wells on August 30, 2018 or September 5, 2018.
- Prepared and submitted a Data Report summarizing the August 8, 2018 and August 14, 2018 post-HRC injection groundwater sampling event and the August 30, 2018 and September 5, 2018 routine groundwater monitoring event to USEPA on October 16, 2018.
- Collected groundwater samples from monitoring wells MW-109S, MW-111S, MW-112S, MW-113S, and MW-114S on October 16 and 17, 2018.
- Prepared and submitted a Data Report summarizing the October 16/17, 2018 post-HRC injection groundwater sampling event to USEPA on December 12, 2018.

DATA COLLECTED THIS PERIOD

Groundwater Monitoring

- Groundwater samples collected from monitoring wells MW-109S, MW-111S, MW-112S, MW-113S, and MW-114S on August 8 and 14, 2018 were analyzed for the following: VOCs, total organic carbon, metals (total and dissolved) including arsenic, chromium (total and hexavalent), manganese, copper, lead, selenium, zinc, iron, lead, and methane. Oxidation reduction potential, pH, dissolved oxygen, and conductivity were measured with a meter in the field during sampling.
- Groundwater samples collected on August 30, 2018 or September 5, 2018 were analyzed for VOCs, and the following metals (total and dissolved): arsenic, chromium (total and hexavalent), copper, lead, selenium, and zinc. In addition, all groundwater samples were analyzed for PFAS, including PFOA and PFOS.

- Groundwater samples collected from monitoring wells MW-109S, MW-111S, MW-112S, MW-113S, and MW-114S on October 16 and 17, 2018 were analyzed for the following: VOCs, total organic carbon, metals (total and dissolved) including arsenic, chromium (total and hexavalent), manganese, copper, lead, selenium, zinc, iron, lead, and methane. Oxidation reduction potential, pH, dissolved oxygen, and conductivity were measured with a meter in the field during sampling.

#### 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 (Submitted February 12, 2013) 100%
- Human Health EI (CA725) Report (Submitted July 1, 2013) 100%
- Data Report Preparation (Additional investigations and groundwater monitoring) (Submitted July 9, 2013) 100%
- Data Report Preparation (Additional well installation and groundwater monitoring) (Submitted October 12, 2013) 100%
- Groundwater Migration under Control EI (CA750) (Submitted March 1, 2014) 100%

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- 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)
  - Draft Corrective Measures Proposal 100%  
(Submitted November 1, 2014)
  - Data Report Preparation 100%  
(December, 2014 additional soil investigation and groundwater monitoring)  
(Submitted February 13, 2015)
  - Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted August 12, 2015)
  - Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted February 23, 2016)
  - Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted August 3, 2016)
  - Draft Work Plan for Hydrogen Release Compound (HRC) 100%  
Pilot Test Preparation  
(Submitted October 7, 2016, addendum submitted to USEPA  
and MDEQ July 12, 2017)
  - Data Report Preparation 100%  
(Groundwater monitoring - October and November, 2016)  
(Submitted February 21, 2017)
  - Data Report Preparation 100%  
(Groundwater monitoring - June 2017)  
(Submitted August 11, 2017)
  - Data Report Preparation 100%  
(Groundwater monitoring - January 2018)  
(Submitted April 11, 2018)

- Data Report Preparation 100%  
(Groundwater monitoring. HRC Pilot Study – May through July 2018)  
(Submitted July 27, 2018)
- Data Report Preparation 100%  
(Groundwater Sampling for HRC Pilot Study and routine groundwater  
monitoring – August to September 2018)  
(Submitted October 16, 2018)
- Data Report Preparation 100%  
(October 16/17, 2018 post-HRC injection groundwater sampling)  
(Submitted December 12, 2018)

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Complete groundwater monitoring and soil sampling as described in the approved Pilot Test Work Plan and Addendum in January, 2019.
- Prepare a Data Report summarizing the results of the January, 2019 soil and groundwater sampling in March/April, 2019.
- Review, discuss and respond to any USEPA or MDEQ comments on Data Reports and other submittals.
- 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 full-scale HRC injection, details for groundwater monitoring, and an implementation schedule. (Depending on completion of the HRC Pilot Test and the timing of and comments from USEPA's review of the CMP).
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, and Data Report(s), as appropriate.