



Applied EcoSystems, Inc.
Environmental Management, Consulting & Field Services

Transmitted via E-mail

January 14, 2021

Æ Project No. 11-4317-102

Mr. Brandon Pursel (pursel.brandon@epa.gov)
U.S. Environmental Protection Agency, Region 5
Land, Chemicals, and Redevelopment Division
77 West Jackson Blvd., LU-16J
Chicago, IL 60604-3590

RE: Second Half 2020 Progress Report
Performance-Based Administrative Order on Consent
RCRA Corrective Action
Flint West Facility #12990
Flint, Michigan
USEPA ID No. MIK204011722^A

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 2020 (July 1, 2020 through December 31, 2020).

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 2020 Progress Report

C: Shaun Shields, EGLE RRD
David Favero, RACER

ATTACHMENT A
SECOND HALF 2020 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
FLINT WEST FACILITY - #12990, FLINT, MICHIGAN
July 1, 2020 to December 31, 2020

WORK PERFORMED THIS PERIOD

- Prepared the First Half 2020 Progress Report and submitted it to USEPA on July 14, 2020.
- Conducted a routine groundwater monitoring event on August 18 and 19, 2020, including gauging all monitoring wells for depth to water on August 18, 2020.
- Collected groundwater samples on August 18 and 19, 2020 from MW-100S, MW-101S, MW-103S, MW-106S, MW-107S, MW-109S, MW-110S, MW-111S, MW-112S, MW-113S, and MW-114S and analyzed for PFAS.
- Prepared and submitted a Data Report summarizing the August 2020 sampling to USEPA on September 29, 2020.
- Prepared a Per- and Polyfluoroalkyl Substances Subsurface Investigation Work Plan and submitted it to USEPA on October 28, 2020.
- Began update of the Site Quality Assurance Project Plan (QAPP) per USEPA request.

DATA COLLECTED THIS PERIOD

Groundwater Monitoring

- Analyzed the groundwater samples collected from monitoring wells on August 18 and 19, 2020 for the following: VOCs, metals (total and dissolved) including arsenic, chromium (total and hexavalent), copper, lead, selenium, zinc, and lead. Data was provided to USEPA in the September 29, 2020 Data Report
- Analyzed the groundwater samples collected from MW-100S, MW-101S, MW-103S, MW-106S, MW-107S, MW-109S, MW-110S, MW-111S, MW-112S, MW-113S, and MW-114S for PFAS, in addition to the above listed parameters. Data was provided to USEPA in the September 29, 2020 Data Report.

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)
- 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)
- Data Report Preparation 100%
(January and February sampling)
(Submitted April 9, 2019)
- Data Report Preparation 100%
(July sampling)
(Submitted September 4, 2019)

- Work Plan for Hydrogen Release Compound (HRC) Injection Preparation (Submitted October 10, 2019) (Comments received from USEPA November 4, 2019) 100%
- Preliminary Draft Response to USEPA November 4, 2019 comment letter (Submitted it to USEPA on January 18, 2020) 100%
- Data Report Preparation (February sampling) (Submitted April 10, 2020) 100%
- Data Report Preparation (August sampling) (Submitted September 29, 2020) 100%
- Per- and Polyfluoroalkyl Substances Subsurface Investigation Work Plan 100% (Submitted to USEPA on October 28, 2020)
- Quality Assurance Project Plan Update (not yet submitted) 80%

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Complete update of Quality Assurance Project Plan
- Complete groundwater monitoring (routine monitoring event) in February 2021.
- Prepare a Data Report summarizing the results of the February 2021 groundwater sampling in March/April 2021.
- Conduct a PFAS subsurface investigation after work plan and QAPP are approved by USEPA Michigan Department of Environment, Great Lakes, and Energy (EGLE).
- Review, discuss and respond to any USEPA or EGLE comments on Data Reports and other submittals.
- Provide support to USEPA for its Statement of Basis and Final Decision process.
- Implement HRC injection work plan if approvals are received.
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, as appropriate.