



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

Transmitted via E-mail

January 10, 2025

Æ Project No. 11-4317-102

Mr. Tyler Jacobs (Jacobs.Tyler@epa.gov)
Physical Scientist, Corrective Action Section 1
Land, Chemicals and Redevelopment Division, Region 5, U.S. EPA
77 West Jackson Blvd. (LR-16J)
Chicago, IL 60604

RE: Second Half 2024 Progress Report
Performance-Based Administrative Order on Consent
RCRA Corrective Action
Flint West Facility #12990
Flint, Michigan
USEPA ID No. MIK204011722^A

Dear Mr. Jacobs:

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 2024 (July 1, 2024 through December 31, 2024).

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

Sincerely,

Rodney Abke, CPG, LPG
Senior Geologist

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 2024 Progress Report

C: Shaun Shields, EGLE RRD
Brendan Mullen, RACER
David Favero, RACER
Mike Smith, Applied Ecosystems

ATTACHMENT A
SECOND HALF 2024 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
FLINT WEST FACILITY - #12990, FLINT, MICHIGAN
July 1, 2024 to December 31, 2024

WORK PERFORMED THIS PERIOD

- Prepared the First Half 2024 Progress Report and submitted it to USEPA on July 12, 2024.
- A Teams meeting with USEPA PM, Tyler Jacobs was conducted on July 24, 2024 to review background and path forward.
- A Teams meeting with USEPA PM, RACER and AE was conducted on August 28, 2024 to review budget priorities and Site goals.
- Conducted a routine groundwater monitoring event on September 17, 2024, including gauging monitoring wells for depth to water on September 17, 2024.
- A Site visit with Tyler Jacobs, David Favero and Mike Smith, was conducted on September 17, 2024.
- Began preparation of an Exposure Pathway Evaluation.
- Prepared a Data Report summarizing the September 2024 sampling, which was submitted to USEPA on December 18, 2024.

DATA COLLECTED THIS PERIOD

Groundwater Monitoring

- Analyzed the groundwater samples collected from monitoring wells MW-103S, MW-108S, MW-110S, MW-112S, and MW-114S¹ on September 17, 2024 for the following: VOCs, metals (total and dissolved) including arsenic, chromium (total and hexavalent), copper, lead, selenium, zinc, lead, and PFAS. Data was provided to USEPA in the December 18, 2024 Data Report.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

- No problems were encountered.

¹ A reduction in the number of wells sampled during the semi-annual sampling events was requested in the November 2021 Subsurface Investigation report dated January 27, 2022, submitted to USEPA. The request was approved by USEPA on March 4, 2022.

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)

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|---|------|
| • Data Report Preparation
(July sampling)
(Submitted September 4, 2019) | 100% |
| • 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
(Submitted to USEPA on October 28, 2020) | 100% |
| • Quality Assurance Project Plan Update
(Submitted to USEPA on April 1, 2021) | 100% |
| • Data Report Preparation
(March sampling)
(Submitted April 23, 2021) | 100% |
| • PFAS Subsurface Investigation Report Preparation
(April Investigation)
(Submitted September 22, 2021) | 100% |
| • Data Report Preparation
(September sampling)
(Submitted November 22, 2021) | 100% |
| • PFAS Subsurface Investigation Report Preparation
(November 2021 Investigation)
(Submitted January 27, 2022) | 100% |
| • Data Report Preparation
(March 2022 sampling)
(Submitted May 13, 2022) | 100% |

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|---|------|
| • Data Report Preparation
(September 2022 sampling)
(Submitted December 13, 2022) | 100% |
| • Data Report Preparation
(March 2023 sampling)
(Submitted June 29, 2023) | 100% |
| • Data Report Preparation
(September 2023 sampling)
(Submitted February 7, 2024) | 100% |
| • Draft Corrective Measures Study
(Submitted February 27, 2024) | 100% |
| • Data Report Preparation
(March 2024 sampling)
(Submitted May 9, 2024) | 100% |
| • Data Report Preparation
(September 2024 sampling)
(Submitted December 18, 2024) | 100% |
| • Exposure Pathway Evaluation
(to be submitted First Quarter 2025) | 90% |

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Complete Exposure Pathway Evaluation in the First Quarter 2025.
- Complete groundwater monitoring (routine monitoring event) in March 2025.
- Prepare a Data Report summarizing the results of the March 2025 groundwater sampling in May 2025.
- 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.
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, as appropriate.