



October 17, 2016

Transmitted via E-mail

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

**Re: Semi-Annual Progress Report (April 2016 through September 2016)  
RCRA Corrective Action Performance-Based Voluntary Agreement  
Van Buren Landfill, Van Buren, Michigan**

Dear Mr. Pursel:

In accordance with paragraph V.4.b. of the Performance-Based Voluntary Agreement (PVA), 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 April 1, 2016 through September 30, 2016 through. The Mannik & Smith Group, Inc. is submitting the attached progress report on behalf of RACER.

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

Sincerely,

Francis J. Biehl, PE  
Project Manager

Attachment A – Semi-Annual Progress Report (April 2016 – September 2015)

Cc: David Favero, RACER  
Grant Trigger, RACER

ATTACHMENT A  
SEMI-ANNUAL PROGRESS REPORT  
PERFORMANCE-BASED VOLUNTARY AGREEMENT  
VAN BUREN TOWNSHIP LANDFILL, VAN BUREN, MICHIGAN  
April 1, to September 30, 2016

WORK PERFORMED THIS PERIOD

- Redeveloped all three (3) ground water monitoring wells on the General Motors (GM) property prior to ground water sampling event in April 2016.
- Conducted semi-annual ground water sampling and analysis of all of the permanent monitoring wells installed during the Phase I thru IV investigation activities as well as monitoring well CRA-266M located in the northeastern portion of the RACER Trust Willow Run site– April 2016.
- Prepared two Groundwater Monitoring Reports associated with the semi-annual April 2016 sampling event and submitted them to the USEPA on August 1, 2016.
- Revised BERA Steps 1-2 (that is the “SLERA”) and submitted a revised report to USEPA on August 5, 2016.
- Began revision of BERA Steps 3-8 as per USEPA comments regarding water quality standards. A surface water sample at SW-2 was collected and analyzed to provide additional surface water hardness data for the BERA.
- Held two conference calls and/or Webex events with the USEPA on June 20 and July 28, 2016 to discuss the BERA process. This included the June 20, 2016 conference call to discuss USEPA comments with the now-retired USEPA risk assessor Dan Mazur and USEPA Project Manager Brandon Pursel on the BERA Steps 1 through 4 submitted on September 8, 2014 and the BERA Steps 5 through 8 submitted on June 18, 2015, and the Webex meeting with a second USEPA risk assessor Jennifer Dodd and USEPA Project Manager Brandon Pursel to discuss ecological risk including revisions to the SLERA and BERA technical issues.
- Received comments back from the USEPA regarding the Corrective Measures Study (CMS) in June 2016. MSG is in the process of revising CMS upon completion of BERA as requested by USEPA.
- Provided all final Van Buren Landfill environmental reports to Belleville Area District Library (4 Volumes) for the public access. Also updated RACER Trust website Property Details webpage to make available these same environmental reports.
- Technical action items: data reviews and progress reporting – ongoing

NEW DATA AVAILABLE THIS PERIOD

- Ground water samples were collected by MSG, as discussed above. Laboratory analytical data has been received and was included in the “RACER Van Buren Landfill Site – April 2016 Semi-Annual Ground Water Sampling Results” and “RACER Van Buren Landfill Site - April 2016 Semi-Annual Ground Water Sampling Results for Wells on the Adjacent General Motors Property” reports, both dated and submitted to the USEPA on August 1, 2016.

## PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

No problems were encountered during this period.

## ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- Current Conditions Report 100%  
CRA submitted Draft Report to the USEPA - October 2011  
Approved by USEPA during a conference call - November 21, 2011
- Performance-Based Administrative Order on Consent 100%  
Effective September 29, 2011
- Site Characterization SAP & QAPP 100%  
Submitted by CRA to USEPA on February 17, 2012  
Approved by the USEPA on June 4, 2012
- Consultant Selection 100%  
Distributed Request for Proposal to several Consultants on February 24, 2012 and proposals were received on March 15, 2012. Signed Agreement for Environmental Consulting with MSG on June 19, 2012
- Clearing and Grubbing for Site Characterization Activities (Phase Ia) 100%  
Completed from July 5 through July 16, 2012 and from July 23 through July 27, 2012
- Site Characterization Fieldwork (Phase Ia) From July 5 through September 25, 2012 100%
- Site Characterization Data Report (Phase Ia), including proposed Phase Ib Sampling Matrix 100%  
Final version addressing USEPA comments (February 7, 2013) submitted on February 19, 2013  
Proposed Phase Ib Sampling Matrix approved by USEPA on February 7, 2013
- Clearing and Grubbing for Site Characterization Activities (Phase Ib) 100%  
Completed March 25, 2013
- Site Characterization Fieldwork (Phase Ib) 100%  
Completed from March 25, 2013 to April 4, 2013
- Human Health EI (CA725) Report (submitted June 28, 2013) 100%
- Site Characterization Phase Ib Data Report 100%  
Including proposed delineation investigation phase II (submitted October 7, 2013)  
Phase II Site Investigation scope approved by USEPA on November 22, 2013 via e-mail
- Phase II Site Investigation Field Work 100%  
Completed from December 3 through December 23, 2013
- Phase II Site Investigation Report 100%  
Including proposed Phase III delineation of off-site groundwater impacts and benzene impacts (submitted March 12, 2014)  
Phase III Site Investigation scope approved by USEPA on March 18, 2014 via e-mail

- Phase III Site Investigation Field Work  
Completed from April 1 through April 30, 2014 100%
- Phase III Site Investigation Report  
Including proposed delineation investigation Phase IV (submitted September 4, 2014) 100%
- Phase IV Site Investigation Field Work  
Completed from May 21, 2015 through March 10, 2016 100%
- Phase IV Site Investigation Report (excluding Willow Run Airport property monitoring well activities)  
Submitted on July 23, 2015. Report specific to GM property submitted on September 2, 2015 100%
- Draft Baseline Ecological Risk Assessment, steps 1 to 4 (submitted September 8, 2014)  
Comments received from USEPA on June 3, 2016 100%
- Draft Baseline Ecological Risk Assessment (Anchor QEA, with MSG support), steps 5 to 8  
Draft submitted June 18, 2015 100%
- RFI Summary Report  
Included as part of Draft CMS submitted October 2, 2015 100%
- Contaminated Groundwater Migration under Control EI (CA750)  
Draft submitted June 30, 2015 100%
- Corrective Measures Study  
Draft submitted October 2, 2015 100%
- Draft Baseline Ecological Risk Assessment (Anchor QEA, with MSG support), Steps 1 to 2  
Report submitted to USEPA on August 5, 2016  
Received acceptance letter from USEPA dated September 14, 2016 100%
- Draft Ecological Risk Assessment (Anchor QEA, with MSG support), Steps 5 to 8 50%
- Final Corrective Measures Study 50%

#### SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Dispose of drums containing soil and ground water investigation-derived waste from the Site.
- Perform semi-annual groundwater sampling and analysis for all permanent monitoring wells – November 2016.
- Perform additional investigation if determined necessary.
- Initiate Surface Debris Cleanup Activities – TBD
- Revise the CMS based on USEPA's June 13, 2016 e-mail comments and taking into account the final BERA results.
- Prepare summaries of meetings, data reviews, or conference calls with USEPA and respond to any comments on submittals received from USEPA - as appropriate.
- Prepare the Semi-Annual Progress Report for October 1, 2016 through March 30, 2017- April 2017