

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

Semi-Annual Progress Report, July 2019 – December 2019
Performance Based Administrative Order on Consent
Docket No. RCRA-5-2011- 0019; RACER Trust Pontiac North Campus
Site 11970 - MID 005 356 886, MID 085470 102 & MID 005 356 910
Pontiac, Michigan

ENVIRONMENT

Date:

January 14, 2020

Dear Mr. Ramanauskas:

Contact:

Brad Saunders

This progress report has been prepared in accordance with Section VI (24b) of the Administrative Order of Consent (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, 2019 through December 31, 2019 for the portions of the Pontiac North Campus (PNC or Site) for which RACER Trust is responsible for remediation.

Phone:

517 974 4441

Email:

Brad.Saunders@arcadis.com

Our ref:

30006882.00002

Work Performed from July 1, 2019 through December 31, 2019
(Includes references to reports which provide relevant details and data collected)

- Finalized the Interim Measures Soil Removal Work Plan and submitted to USEPA on July 10, 2019 for implementation of a risk-based cleanup and disposal notification under TSCA regulations to excavate PCB-impacted soils with concentrations exceeding 100 ppm in AOI W-1. Received approval for the Soil Removal PCB IMWP from USEPA on July 31, 2019. Conducted two subsurface investigations in the nearby elevated southwest portion of the RACER parcel leased to USPS on July 24 and September 13, 2019 to evaluate shallow soils for potential use as backfill material in the AOI W-1 PCB-impacted soil excavation, and submitted a memo report to USEPA on October 22, 2019 recommending use of shallow soils in the area for backfill material in the PCB excavation. Received acknowledgment of the backfill source memo report from USEPA on October 25, 2019 understanding that a defined area of shallow soils which tested under PCB detection limits within

the proposed backfill source area would be used towards the top of the excavation for backfill material.

- Prepared and finalized a Request for Proposal (RFP) for PCB-impacted soil removal & restoration, and submitted to six prospective contractors on September 16, 2019. Conducted a pre-bid site walk & meeting, obtained quotations, and awarded the contract to US Ecology on October 21, 2019. Mobilized with US Ecology on November 11, 2019 to commence implementation of PCB-impacted soil removal and restoration activities as specified in the approved IMWP. As of December 31, 2019, work was approximately 70% complete.
- Following up on maintenance activities performed in June 2019, completed surveying activities and set permanent markers with elevation references over the soil caps covering PCB Areas 1 & 2 located on the Rivore property on August 14-16, 2019 to facilitate future inspections.
- Continued recovery of LNAPL and performed associated O&M activities at RW-08-14 located within AOI W-10 and LNAPL Area 2A from July-December 2019. Clean Harbors transported approximately 147 gallons of liquid LNAPL TSCA waste to its licensed treatment facility in La Porte, TX for incineration on November 7, 2019.
- Completed a combined response to USEPA questions, comments and suggested edits to both the January 9, 2019 Supplemental 1,4-Dioxane/VOC/SW Fiero Boundary investigation Report and the January 29, 2019 Annual Groundwater Monitoring Report and submitted to USEPA on August 8, 2019. Recommended actions were integrated into the 2019 annual groundwater monitoring event summarized below.
- Incorporating components of the SW Fiero Boundary investigation and USEPA requests for select additional gauging data in response to the August 8, 2019 USEPA submittal, planned and completed the 2019 annual groundwater monitoring event from October 7-11, 2019. Commenced preparation of the 2019 Annual Groundwater Monitoring Report scheduled for completion in early 2020.
- Conducted routine operations and maintenance activities associated with the Montcalm Street groundwater reinjection system from July through December 2019. Mitigation of groundwater from the Site onto Montcalm Street was successfully prevented during the timeframe.
- Conducted additional groundwater investigation activities based on questions and comments posed by USEPA and EGLE in response to the June 18, 2019 Duck Pond Summary Documentation for GSI Pathway Determination Memorandum submitted by Arcadis on behalf of RACER. On August 12, 2019, an additional groundwater monitoring well (MWDP-05) was installed on the portion of the Duck Pond property. On August 23 and December 2, 2019, Arcadis conducted sampling activities for analysis on behalf of RACER of monitoring wells located at the Duck Pond Property. Activities included gauging of monitoring wells located at the Duck Pond and nearby surrounding properties. Correspondence related to pursuing a Corrective Action Compliance with Controls is ongoing with USEPA and EGLE.
- Initiated historical review of previous investigation, maintenance, discharge permit correspondence and corrective action documentation to address USEPA questions pertaining to prior impacts observed in storm sewer manhole(s) at the Fiero property.
- Continued support and coordination with existing property owners.

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%
• Draft Duck Pond GSI Memo submitted to USEPA (Rev 11/21/19)	90%
• RFI Summary Report (In Progress)	70%
• 2020 Budget Authorization approved by USEPA (12/20/19)	100%

Corrective Measures – Institutional Controls

• Draft Declaration of Restrictive Covenants (DRCs)	50%
• 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%
- Amendment to DRC for the former Plant 14 South property 25%
- Recorded DRC for the USPS property (April 2018) 100%
- Revised Draft DRC for USPS property provided to USEPA for Review (July 2019) 90%
- Revised Draft DRC for Duck Pond property provided to USEPA and EGLE for Review (Aug 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 Implementation (In Progress) 50%

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 USPEA (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 (In Progress) 25%

- LNAPL Recovery System Completion Memo Report (In Progress) 5%

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 (In Progress) 75%

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 Groundwater Reinjection System Operation, Maintenance & Monitoring Ongoing
- Montcalm Groundwater Reinjection System Completion Memo Report (In Progress) 10%
- Fiero Prior Storm Sewer Impact Resolution Response to USEPA (In Progress) 50%

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 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%

Project Schedule – Work to be Completed During Next Reporting Period

A task-based Gant chart for the 2020 Project Schedule is attached. Items scheduled to be completed during the next reporting period:

- Finalize implementation of PCB-impacted soil removal at AOI W-1 consistent with the PCB Soil Removal IM Work Plan, and complete preparation of an PCB-impacted Soil AOI W-1 IM Completion Report.
- Complete the memo report summarizing TSCA soil cap maintenance, surveying and permanent marker placement activities completed from June-August 2019.
- Continue LNAPL IM Removal operations and maintenance activities at RW-08-14 and continue preparation of the LNAPL Recovery System RW-08-14 IM Completion Report.
- Complete preparation of the 2019 Annual Groundwater Monitoring Report, incorporating USEPA comments and considerations from the results of the Southwest Fiero/USPS Boundary groundwater investigation.
- Continue Montcalm Groundwater Reinjection System IMWP operation, monitoring and maintenance activities, and complete the Montcalm Groundwater Reinjection System Completion Report.
- Continue investigation activities and address USEPA and EGLE comments regarding the January 6, 2017 RCRA Corrective Action Complete with Controls Determination request for the Duck Pond property.
- Complete and submit the RFI Summary Report commenced in 2019, and continue updating and development of the CMS to support the final decision process.
- Respond to any comments received from USEPA or EGLE on submittals or other matters.

Problems Encountered

Snow, wet, and windy conditions experienced during the November-December 2019 timeframe as well the limited availability of trucks for hauling PCB-impacted material during the holiday season slightly delayed implementation of the PCB interim measures work plan (IMWP) implementation project which is now expected to carry through January 2020.

Should you have any questions on the information provided within this progress report, please feel free to contact me.

Mr. Peter Ramanauskas
U.S. Environmental Protection Agency
January 14, 2020

Sincerely,

Arcadis of Michigan, LLC



Brad Saunders, PE (MI)
Principal Engineer

Copies:

Dan Dailey, EGLE
Dave Favero, RACER
File

Enclosure:

Attachment

1 2020 Project Schedule

ID	Task Name	Duration	Start	Finish	Predecessors	Resource Names	January 1		February 1		March 1		April 1		May 1		June 1		July 1		August 1		September 1		October 1		November 1		December 1	
							12/29	1/12	1/26	2/9	2/23	3/8	3/22	4/5	4/19	5/3	5/17	5/31	6/14	6/28	7/12	7/26	8/9	8/23	9/6	9/20	10/4	10/18	11/1	11/15
1	Task 1- Project Management	262 days	Wed 1/1/20	Thu 12/31/20																										
2	Monthly PM Activities	240 days	Sat 2/1/20	Thu 12/31/20																										
15	Prepare & Submit 2021 Budget Authorization	60 days	Tue 9/1/20	Mon 11/23/20																										
16	Task 2 - Corrective Action (General)	262 days	Wed 1/1/20	Thu 12/31/20																										
17	Semi-Annual Progress Report Prep/Submittal	140 days	Wed 1/1/20	Tue 7/14/20																										
20	Revise Draft CMS, Edit, Finalize & Submit to USEPA	152 days?	Fri 5/1/20	Mon 11/30/20																										
21	Draft CMI Work Plan, Edit, Finalize & Submit to USEPA (Schedule TBD)	1 day?	Wed 1/1/20	Wed 1/1/20																										
22	Task 3 - Corrective Measures Institutional Controls	262 days	Wed 1/1/20	Thu 12/31/20																										
23	Revisions to USPS Parcel DRC	262 days?	Wed 1/1/20	Thu 12/31/20																										
24	Revisions to Rivore DRC	132 days?	Wed 7/1/20	Thu 12/31/20																										
25	Task 4 - Corrective Measures - Soil	262 days	Wed 1/1/20	Thu 12/31/20																										
26	Complete PCB IMWP Implementation	87 days?	Wed 1/1/20	Thu 4/30/20																										
27	PCB IMWP Implementation Reporting	130 days?	Wed 1/1/20	Tue 6/30/20																										
28	Perform Annual Soil Cap Inspections	44 days	Tue 9/1/20	Fri 10/30/20																										
29	Task 5 - Corrective Measures - GW / LNAPL	262 days	Wed 1/1/20	Thu 12/31/20																										
30	RW-08-14 LNAPL Recovery System O&M	262 days?	Wed 1/1/20	Thu 12/31/20																										
31	LNAPL Decision Tree Update & Submittal to USEPA	110 days?	Mon 6/1/20	Fri 10/30/20																										
32	USPS Pkg Lot LNAPL Area 11 Well Abandonment & Installation	88 days?	Mon 6/1/20	Wed 9/30/20																										
33	GW CM Area/Pathway Investigation, Evaluation & reporting Activities	262 days	Wed 1/1/20	Thu 12/31/20																										
34	Task 6 - Groundwater Monitoring	262 days	Wed 1/1/20	Thu 12/31/20																										
35	Finalize & Submit 2019 Report	33 days?	Wed 1/1/20	Fri 2/14/20																										
36	Annual Groundwater Sampling	4 days	Sat 10/5/19	Wed 10/9/19																										
37	Prepare & Submit 2020 Report	50 days	Fri 10/23/20	Thu 12/31/20																										
38	Well Repair, Protection and Abandonment Activities	121 days	Mon 6/1/20	Mon 11/16/20																										
39	Task 7 - Storm Sewers (Seep)	262 days	Wed 1/1/20	Thu 12/31/20																										
40	Seep Reinjection System OM&M & Reporting	262 days	Wed 1/1/20	Thu 12/31/20																										
41	Fiero Prior Storm Sewer Impact Resolution Response to USEPA	87 days?	Wed 1/1/20	Thu 4/30/20																										