

Transmitted via E-mail

Mr. Nate Nemani
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ENVIRONMENT

Subject:

Performance Based Administrative Order on Consent, Docket No. RCRA-5-2011-0019
Semi-Annual Progress Report, January 2016 – June 2016
RACER Trust Pontiac North Campus Site 11970 - MID 005 356 886
Pontiac, Michigan

Date:

July 15, 2016

Contact:

Christi Kiker

Phone:

517 324 5044

Email:

Christ.Kiker@arcadis.com

Our ref:

B0064607.2016

Dear Mr. Nemani:

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, percent complete, project schedule, and problems encountered for the period from January 1, 2016 through June 30, 2016 for the portions of the Pontiac North Campus (PNC or the Site) for which RACER Trust is responsible for remediation.

Work Performed from January 1, 2016 through June 30, 2016

- Conducted fluid level measurement of the PCB delineation temporary wells and LNAPL sampling of two wells on January 18-21 2016.

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- Responded to USEPA questions regarding the recommended groundwater monitoring parameters in the Draft Fiero CMI Work Plan in February 2016.
- Submitted *Draft Summary of Groundwater and LNAPL Data – USPS Area* to USEPA on April 4.
- Submitted *Supplemental Site Characterization Scope of Work* to USEPA on April 4. Received approval from USEPA on April 8 (via email).
- Completed field activities for the Supplemental Site Characterization Scope of Work in May 2016.
- Sampled surface water and sediment in the concrete retention pond at the Duck Pond property on May 9.
- Continued revision/update of the Draft Corrective Measures Study.
- Continued development of Montcalm Seep IM Work Plan, focusing on phytoremediation and regrading of the seep area to maximize planting area.
- Continued support for property transactions.

Data Collected

Supplemental site characterization soil, groundwater, LNAPL and soil gas data and Duck Pond surface water and sediment data were collected and will be included in separate data report submittals.

Estimated Percent Complete

Project Management Ongoing

Corrective Action – General

- | | |
|---|------|
| • Current Conditions Report submitted to USEPA (11/25/11) | 100% |
| • 2012 Budget Authorization submitted to 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 (9/19/12) | 100% |
| • 2012 Budget Amendment 3 approved (9/19/12) | 100% |
| • 2013 Budget Authorization approved (1/25/13) | 100% |
| • Draft CMP Report submitted to USEPA (3/15/13) | 100% |
| • 2013 Budget Amendment 1 approved (7/18/13) | 100% |
| • 2013 Budget Amendment 2 approved (11/12/13) | 100% |
| • 2014 Budget Authorization approved (11/20/13) | 100% |

- 2014 Budget Amendment 1 approved (5/23/14) 100%
- 2015 Budget Authorization approved (11/20/14) 100%
- Fiero Focused CMS approved by USEPA (7/1/15) 100%
- Draft Fiero CMI Work Plan (10/7/15) 99%
- Duck Pond Data Summary Memo 95%
- Revised Draft PNC CMS submittal
to USEPA (targeted for December 2016) 85%

Corrective Measures – Institutional Controls

- Draft Deed Restrictions 20%

Corrective Measures – Soil

- AOI M-27 soil delineation completed (March 2013) 100%
- AOI M-27 arsenic-impacted soil removal (December 2013) 100%
- Draft TSCA soil cap work plan submitted to USEPA (5/13/15) 90%

Corrective Measures – Groundwater/LNAPL

- LNAPL investigation on USPS property (Sep-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 (1/30/15) 100%
- Draft PCB Investigation Summary Memo submitted (2/6/2015) 100%
- Additional PCB LNAPL Delineation activities (April-June 2015) 100%
- Draft 2014-2015 PCB Investigation Summary memo (8/17/15) 99%
- Supplemental Site Characterization field/reporting (May/June 2016) 85%

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%

Storm Sewers

- Montcalm toe drain swale construction (February 2012) 100%
- Sewer bulkheading activities completed (April 2012) 100%
- Swale/sidewalk construction (September 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 Avenue Seep Remedy Evaluation (March 2015 - 2016) 70%
- Montcalm Seep Interim Measure (in progress) 30%

Former RCRA Hazardous Waste Management Units (WMUs) – (Fiero property – 2 WMUs, USPS property – 1 WMU)

- Soil/groundwater delineation completed during RFI activities (2001-2011) 100%
- Proposed corrective measures for WMUs (site-wide deed restrictions) incorporated into Fiero Focused CMS and revised Draft PNC CMS. 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. 100%

Project Schedule – Work to be completed during next reporting period

A task based Gant chart for the 2016 Project Schedule is attached.

Items scheduled to be completed during the next reporting period

- Respond to and finalize RFI report after receipt of USEPA comments.
- Complete and submit the Supplemental Site Characterization Summary Report.
- Complete and submit the Duck Pond Data Summary Memo.
- Complete and submit revised Draft PNC CMS (update to account for groundwater/LNAPL data collected in 2016 and dependent upon evaluation of supplemental site characterization data).
- Finalize and submit Montcalm Seep IM Work Plan to City of Pontiac, respond to any comments from USEPA or the city of Pontiac, and when appropriate submit USPS notifications, procure a contractor, and begin construction activities.

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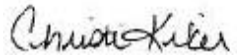
- USPS WMU inspection coordination.
- Annual inspection of the existing interim cap and maintenance (if necessary).
- Follow up activities, if any, as identified in the Supplemental Site Characterization Summary Report.
- Prepare and submit any needed budget amendments.

Problems Encountered

None

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

Sincerely,
Arcadis of Michigan, LLC



Christi Kiker
Certified Project Manager

Enclosure:

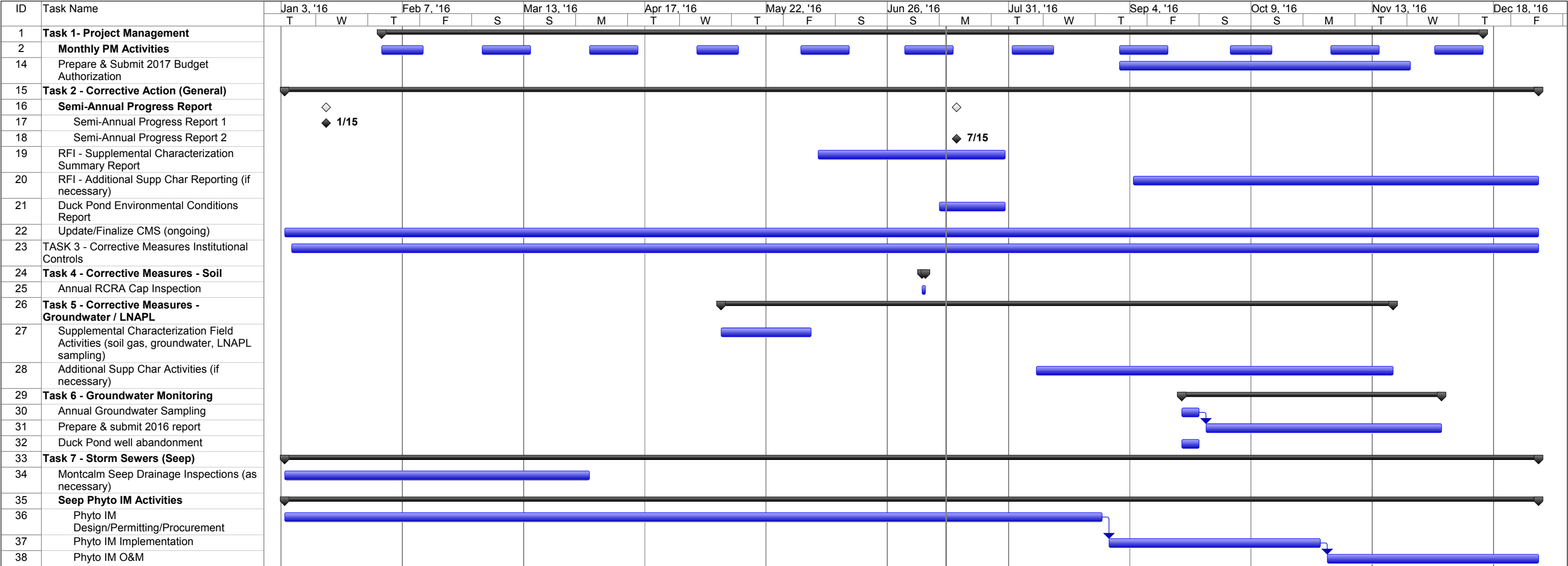
Attachment

1 2016 Project Schedule

Copies:

Dan Dailey, MDEQ
Dave Favero, RACER
Derek Kaiding, ARCADIS

File



Project: PNC 2016 Schedule
Date: Wed 7/13/16

Task

Split

Milestone

Summary

Project Summary

External Tasks

External Milestone

Inactive Task

Inactive Milestone

Inactive Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

Start-only

Finish-only

Progress

Deadline