

Transmitted via E-mail

Mr. Nate Nemani
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
LU-9J
Chicago, IL 60604-3590

Arcadis of Michigan, LLC
28550 Cabot Drive
Suite 500
Novi
Michigan 48377
Tel 248 994 2240
Fax 248 994 2241
www.arcadis.com

Subject:

Performance Based Administrative Order on Consent, Docket No. RCRA-5-2011-0019
Semi-Annual Progress Report, July 2015 – December 2015
RACER Trust Pontiac North Campus Site 11970 - MID 005 356 886
Pontiac, Michigan

ENVIRONMENT

Date:

January 14, 2016

Dear Mr. Nemani:

Contact:

Christi Kiker

Phone:

517 324 5044

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 July 1, 2015 through December 31, 2015 for the portions of the Pontiac North Campus (PNC or the Site) for which RACER Trust is responsible for remediation.

Email:

Christ.Kiker@arcadis.com

Our ref:

B0064607.2016

Work Performed From July 1, 2015 through December 31, 2015

- DRAFT Interim RACER Pontiac North Campus – 2014- 2015 PCB Investigation Summary Memorandum submitted to EPA on August 17, 2015.

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- Annual groundwater sampling was conducted on September 21 through 24, 2015. Report was submitted to USEPA on December 23, 2015.
- Fiero Focused CMS was approved by USEPA on August 21, 2015.
- Draft Fiero CMI Work Plan submitted to USEPA on October 7, 2015.
- Disposed of waste generated during the 2015 PCB Investigation.
- Continued revising the Draft Corrective Measures Study.
- Continued evaluation of Montcalm seep remedy alternatives, focusing on phytoremediation and regrading of the seep area to maximize planting area.
- Continued support for property transactions (ongoing).

Data Collected

Groundwater sampling data 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 Corrective Measures Implementation Work Plan (10/7/15) | 99% |
| • Revised Draft PNC CMS submittal to USEPA (Feb 2016) | 90% |

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 completed (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 (April-June 2015) 100%
- Draft 2014-2015 PCB Investigation Summary memo (8/17/15) 99%

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 into 2016) 70%

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 revised Draft PNC CMS report for agency review (update to account for new LNAPL data/PCB Delineation).
- Upon approval from USEPA, support Statement of Basis development for PNC.
- Finalize Montcalm seep remedy evaluation and begin USEPA work plan development, design, procurement and construction activities.
- USPS WMU inspection coordination.
- Responding to USEPA soil cap work plan comments, annual inspection of the existing interim cap and maintenance (if necessary).
- Selected soil remedy data gap activities (if necessary).
- LNAPL remedy data gap activities including fluid level measurement of the PCB delineation temporary wells and sampling of any wells with newly detected LNAPL and transmissivity testing of select wells targeted for LNAPL corrective measures (one event).
- Prepare and submit any needed budget amendments.

Problems Encountered

None

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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

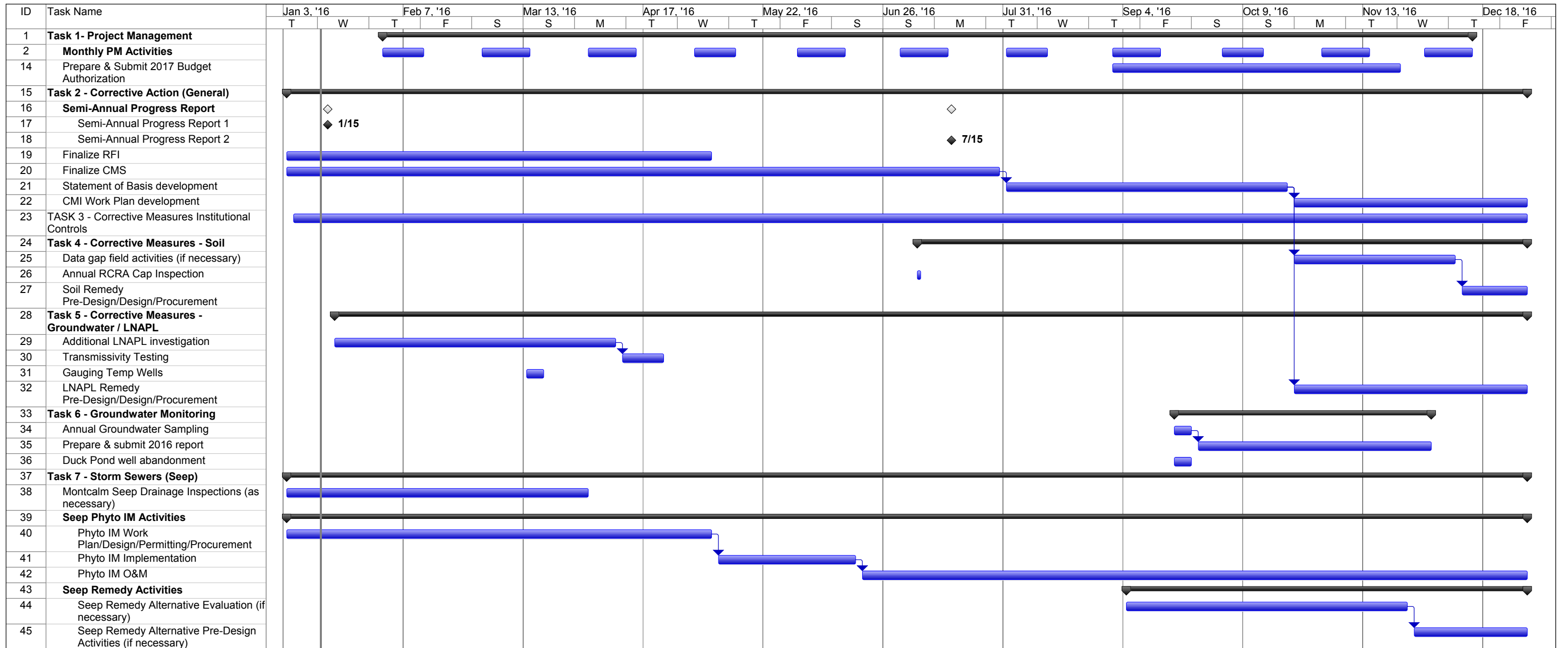
Copies:

Dan Dailey, MDEQ

Dave Favero, RACER

Derek Kaiding, ARCADIS

File



Project: PNC 2016 Schedule
Date: Thu 1/14/16

