



October 13, 2017

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 2017 through September 2017)  
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, 2017 through September 30, 2017 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,

A handwritten signature in blue ink that reads "Francis J. Blehl".

Francis J. Blehl, PE  
Project Manager

Attachment A – Semi-Annual Progress Report (April 2017 – September 2017)

Cc: David Favero, RACER  
Grant Trigger, RACER



**TECHNICAL SKILL.  
CREATIVE SPIRIT.**

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ATTACHMENT A  
SEMI-ANNUAL PROGRESS REPORT  
PERFORMANCE-BASED VOLUNTARY AGREEMENT  
VAN BUREN TOWNSHIP LANDFILL, VAN BUREN, MICHIGAN  
April 1, 2017 to September 30, 2017

WORK PERFORMED THIS PERIOD

- 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 former RACER Trust Willow Run site during April 2017.
- Prepared the Van Buren Landfill and GM property-specific Groundwater Monitoring Reports associated with the April 2017 sampling event and submitted them to the USEPA of July 14, 2017.
- Addressed USEPA comments on the Draft Ecological Risk Assessment Steps 3 through 8 (BERA) in their conditional approval letter dated May 22, 2017 and their comments during a conference call on June 13, 2017. Submitted an updated BERA to the USEPA via e-mail on July 7, 2017 and USEPA accepted the updated BERA via a September 21, 2017 email
- 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 2017 Semi-Annual Ground Water Sampling Results" and "RACER Van Buren Landfill Site - April 2017 Semi-Annual Ground Water Sampling Results for Wells on the Adjacent General Motors Property" reports, both dated and submitted to the USEPA on July 14, 2017.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

No problems were encountered during this period.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- |   |      |
|---|------|
| • Current Conditions Report<br>CRA submitted Draft Report to the USEPA - October 2011<br>Approved by USEPA during a conference call - November 21, 2011   | 100% |
| • Performance-Based Administrative Order on Consent<br>Effective September 29, 2011   | 100% |
| • Site Characterization SAP & QAPP<br>Submitted by CRA to USEPA on February 17, 2012<br>Approved by the USEPA on June 4, 2012   | 100% |
| • Consultant Selection<br>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 | 100% |

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

Draft submitted June 30, 2015

- Corrective Measures Study 100%  
Draft submitted October 2, 2015
- Draft Baseline Ecological Risk Assessment (Anchor QEA, with MSG support), Steps 1 to 2 100%  
Report submitted to USEPA on August 5, 2016
- Draft Ecological Risk Assessment (Anchor QEA, with MSG support), Steps 5 to 8 100%  
Received acceptance letter from USEPA dated September 14, 2016  
Updated report submitted to USEPA on July 7, 2017  
Received acceptance email from USEPA dated September 21, 2017
- Final Corrective Measures Study 50%

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

- Perform semi-annual groundwater sampling and analysis for all permanent monitoring wells – October 2017 and prepare necessary reports.
- Perform additional investigation if determined necessary.
- Initiate Surface Debris Cleanup Activities – TBD
- Revise and/or address any additional USEPA comments on the BERA if necessary.
- Revise the CMS based on the final BERA results and any additional USEPA comments.
- 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, 2017 through March 31, 2018 - March 2018