



October 12, 2020

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 2020 through September 2020)
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, 2020 through September 30, 2020 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, appearing to read 'Francis J. Biehl'.

Francis J. Biehl, PE
Project Manager

Attachment A – Semi-Annual Progress Report (April 1 2020 – September 30 2020)

Cc: David Favero, RACER



TECHNICAL SKILL.
CREATIVE SPIRIT.

R2330026_VanBurenLF_RPT_October_2020_SemiannualProgressReport.docx

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ATTACHMENT A
SEMI-ANNUAL PROGRESS REPORT
PERFORMANCE-BASED VOLUNTARY AGREEMENT
VAN BUREN TOWNSHIP LANDFILL, VAN BUREN, MICHIGAN
April 1, 2020 to September 30, 2020

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 wells CRA-266M, CRA-265M, CRA-834M, and CRA-833M located in the northeastern portion of the former RACER Trust Willow Run site during May 2020.
- Prepared the Van Buren Landfill and GM property-specific Groundwater Monitoring Reports associated with the May 2020 sampling and submitted those in August 2020.
- Provided previous reports to Belleville Library as a public repository.
- Prepared and submitted Wayne County Airport Authority Ground Water Wells Abandonment Memo dated October 6, 2020.
- 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 was received and the data was provided to USEPA in the August, 2020 groundwater monitoring reports.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

No problems were encountered during this period.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| • Current Conditions Report
CRA submitted Draft Report to the USEPA - October 2011
Approved by USEPA during a conference call - November 21, 2011 | 100% |
| • Performance-Based Administrative Order on Consent
Effective September 29, 2011 | 100% |
| • Site Characterization SAP & QAPP
Submitted by CRA to USEPA on February 17, 2012
Approved by the USEPA on June 4, 2012 | 100% |
| • Consultant Selection
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)
Completed from July 5 through July 16, 2012 and from July 23 through July 27, 2002 | 100% |

- 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
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 100%
- Clearing and Grubbing for Site Characterization Activities (Phase Ib)
Completed March 25, 2013 100%
- Site Characterization Fieldwork (Phase Ib)
Completed from March 25, 2013 to April 4, 2013 100%
- Human Health EI (CA725) Report (submitted June 28, 2013) 100%
- Site Characterization Phase Ib Data Report
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 100%
- Phase II Site Investigation Field Work
Completed from December 3 through December 23, 2013 100%
- Phase II Site Investigation Report
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 100%
- 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 100%

Draft submitted October 2, 2015

- Draft Baseline Ecological Risk Assessment (Anchor QEA, with MSG support), Steps 1 to 2
Report submitted to USEPA on August 5, 2016 100%
- Draft Ecological Risk Assessment (Anchor QEA, with MSG support), Steps 5 to 8
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 100%
- Ecological Risk Mitigation Evaluation- MEMO drafted, February 8, 2018 100%
- Corrective Measures Study (CMS)
Updated draft submitted September 6, 2018 100%
- CMS Addendum regarding Targeted Pump and Treat Alternative. Draft submitted May 20, 2019 100%
- Notice of Migration of Contamination, Distributed in December 2019 100%

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Prepare draft 2021 Annual Environmental Action Budget Request, review with USEPA and finalize.
- Complete and submit groundwater monitoring reports for Fall 2020 sampling event.
- Perform semi-annual groundwater sampling and analysis for all permanent monitoring wells and prepare necessary reports.
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, respond to any comments on submittals received from USEPA, and provide support for USPEA Statement of Basis and Final Decision process - as appropriate.
- Prepare the Semi-Annual Progress Report for October 1, 2020 – March 31, 2021.