

Mr. Peter Ramanauskas
U.S. Environmental Protection Agency Region 5
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Subject:
Semi-Annual Progress Report, January 2020 – June 2020
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:
July 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 January 1, 2020 through June 30, 2020 for the portions of the Pontiac North Campus (PNC or Site) for which RACER Trust is responsible for remediation.

Phone:
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Email:
Brad.Saunders@arcadis.com

Our ref:
30042811.00002

Work Performed from January 1, 2020 through June 30, 2020
(Includes references to reports which provide relevant details and data collected)

- Continued implementation of the USEPA-approved Interim Measures Work Plan (IMWP) for the PCB-impacted soil risk-based disposal and cleanup notification at AOI W-1 which was initiated by Arcadis and US Ecology in November 2019. Completed removal, backfill, PCB cap placement and permanent marker installation and surveying activities after the first week in February 2020. Initial restoration activities were performed prior to demobilization in February 2020, and then completed in May 2020 when field conditions were conducive for supplemental seeding. As of the end of June 2020, the soil erosion and sediment control permit with Oakland County remains in place pending sufficient revegetation and a final inspection. Began preparation of the completion work report which is currently approximately 70% complete.

- Continued recovery of LNAPL and performed associated O&M activities at RW-08-14 from January-June 2020. Accumulation of an additional approximate 125 gallons of fluid has occurred since the last off-site transportation and disposal event in November 2019. Completed preparation of a Technical Memorandum Report entitled LNAPL Recovery Well RW/SB-08-14 Interim Measures Implementation, System Installation and Operation Update and submitted to USEPA on April 28, 2020.
- Based on the results of recent annual groundwater monitoring events and the most recent EGLE guidelines for evaluation of the vapor intrusion pathway, prepared a Fiero Property VI Well Installation Scope of Work (SOW), which was submitted to USEPA and EGLE on May 7, 2020. Received approval from USEPA and EGLE to proceed with the SOW and field work is currently in the process of being scheduled.
- Completed preparation of the 2019 Annual Groundwater Monitoring Report summarizing the results of the October 2019 sampling event and submitted to USEPA on February 18, 2020. Commenced preparation of a well abandonment request to USEPA specific to the former Fiero properties as part of an effort to minimize redundant, unnecessary or unused groundwater monitoring wells at the Site and associated ongoing maintenance costs, as well as to facilitate redevelopment activities.
- Conducted routine O&M associated with the Montcalm Street Seep toe drain and reinjection system from January through June 2020. Seepage of groundwater from the Site onto Montcalm Street was successfully prevented during this timeframe. Commenced preparation of the completion report, which is currently approximately 90% complete.
- As follow-up to ongoing USEPA and EGLE correspondences related to the Duck Pond property, completed the third of three quarterly groundwater monitoring events on March 3-4, 2020. Summarized the results of sampling and previous activities in a Technical Memorandum Report entitled 2019-2020 Duck Pond Groundwater Investigation and submitted to USEPA on April 7, 2020, with recommendations for finalization of the DRC and finalization of the Corrective Action Completion with Controls request. A draft DRC was submitted to USEPA and EGLE on August 26, 2019 and an updated draft DRC is expected to be provided in the second half of 2020 to USEPA and EGLE for review.
- Continued and completed a historical review of previous investigation, maintenance, and discharge permit correspondence and corrective action documentation to address USEPA questions pertaining to prior impacts detected in storm sewer manhole(s) at the Fiero property, and submitted a Technical Memorandum Report to USEPA on March 3, 2020 entitled Summary of Former Fiero VOC Detections in Storm Sewer Outfalls.
- Continued support and coordination with existing property owners and to facilitate transactions with prospective new property owners.
- Provided draft First Amended DRCs for the Proastio and Railroad Parcels to USEPA and EGLE for review on April 6, 2020, separated the DRC into one DRC for Proastio and one DRC for the Railroad parcels, and received approval from USEPA and EGLE on April 17, 2020, and recorded the DRC with Oakland County on May 12, 2020.
- Provided an updated draft DRC for the USPS parcel to USEPA and EGLE for review and approval on June 26, 2020.

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%
- RFI Summary Report (In Progress) 70%
- 2020 Budget Authorization approved by USEPA (12/20/19) 100%
- 2020 Budget Modification 1 approved by USEPA (2/3/20) 100%
- EGLE Waste Management Division inspection of Site Corrective Actions scheduled for July 27, 2020 5%

Corrective Measures – Institutional Controls

- Declaration of Restrictive Covenants (DRCs) recorded for all Site parcels 60%

- 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%
- Recorded DRC for the USPS property (April 2018) 100%
- Obtained USEPA and EGLE approval of First Amended DRC for the Proastio Parcel (former Plant 14 South) and Railroad Parcels (4/17/2020) and Recorded (May 12, 2020) 100%
- Obtained USEPA and EGLE approval of First Amended DRC for USPS property and Record (draft submitted 6/26/2020) 90%
- Obtained USEPA and EGLE approval of First Amended DRC for Duck Pond property and Record (draft submitted 8/26/2019) 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 Field Implementation (Nov 2019 – Jun 2020) 95%
- PCB-impacted Soil AOI W-1 IMWP Completion Report (In Progress) 70%

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)	50%
• Duck Pond Summary for GSI Pathway Determination submitted to USEPA (6/18/19)	100%
• 2019-2020 Duck Pond GW Investigation Memo submitted to USEPA (4/7/20)	100%
• LNAPL Recovery System Completion Memo Report (4/28/20)	100%
• Fiero Property VI Well Installation SOW approved by USEPA & EGLE (5/7/20)	100%
• Fiero Property VI Well Installation SOW / Investigation implementation (In Progress)	10%

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 submitted to USEPA (2/18/20)	100%
• Fiero Properties Well Abandonment Request (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)	90%

- Fiero Summary of Former VOC Detections Memo Report submitted to USEPA (3/3/20) 100%

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 and soil vapor 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%
- EGLE Waste Management Division inspection of Fiero WMUs AOI F-3 and AOI F-6 scheduled for July 27, 2020 (time permitting) 5%

Project Schedule – Work to be Completed During Next Reporting Period

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

- Finalize restoration activities associated with implementation of PCB-impacted soil removal at AOI W-1 consistent with the PCB Soil Removal IMWP, and complete preparation of the PCB-impacted Soil AOI W-1 IM Completion Report.
- Continue LNAPL IM Removal operations and maintenance activities at RW-08-14. Consistent with recommendations made in the completion report, based on the current recovery rate temporarily discontinue LNAPL recovery operations on August 1, 2020. Upon accumulation of sufficient LNAPL at this location and other locations of accumulation at the Site, conduct transmissivity testing to evaluate LNAPL recoverability.
- Complete implementation of the Fiero Property VI Well Installation SOW, and complete a report summarizing the results of the groundwater investigation to USEPA and EGLE.
- Complete preparation and submit a request to USEPA to abandon select groundwater monitoring wells at the former Fiero properties, and proceed with abandoning wells approved by USEPA.
- Conduct the 2020 Annual Groundwater Monitoring event in October 2020, and commence preparation of the report.

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

- Continue Montcalm Seep Control System IMWP operation, monitoring and maintenance activities, and complete preparation of the Montcalm Seep Control System Completion Report for submittal to USEPA.
- Finalize and submit an updated draft First Amended DRC for the Duck Pond parcel and follow-up with USEPA and EGLE as necessary to obtain approval and record the DRC.
- Continue follow-up activities with USEPA and EGLE related to review and finalization of updated First Amended DRC for the USPS parcel.
- Continue follow-up activities with USEPA and EGLE pertaining to the January 6, 2017 RCRA Corrective Action Complete with Controls Determination request for the Duck Pond property.
- Continue preparation and updates to the RFI Summary Report commenced in 2019, and continue updating and development of the CMS to support the final decision process.
- Initiate development and review of possible upgrades and alternate options for mitigating the Montcalm seep.
- Respond to any comments received from USEPA or EGLE on submittals or other matters.

Problems Encountered

Wet conditions and concerns due to the COVID-19 pandemic slightly delayed soil restoration activities in early 2020 associated with the PCB interim measures work plan (IMWP) implementation project, although scheduled activities were on track as of the end of the reporting period.

Should you have any questions on the information provided within this progress report, please feel free to contact David Favero with RACER Trust at dfavero@racertrust.org or 217-741-6235 or me.

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	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	11/29	12/13	12/27	
1	Task 1 - Project Management	264 days	Wed 1/1/20	Thu 12/31/20	[Summary Bar]																											
2	Monthly PM Activities	242 days	Sat 2/1/20	Thu 12/31/20	[Summary Bar]																											
15	Prepare, Submit & Obtain Approval of 2021 Budget Authorization	60 days	Tue 9/1/20	Mon 11/23/20	[Progress Bar]																											
16	Task 2 - Corrective Action (General)	264 days	Wed 1/1/20	Thu 12/31/20	[Summary Bar]																											
17	Semi-Annual Progress Report Prep/Submittal	141 days	Wed 1/1/20	Tue 7/14/20	[Summary Bar]																											
20	Revise Draft CMS, Edit, Finalize & Submit to USEPA (Schedule TBD)				[Summary Bar]																											
21	Draft CMI Work Plan, Edit, Finalize & Submit to USEPA (Schedule TBD)				[Summary Bar]																											
22	Task 3 - Corrective Measures Institutional Controls	264 days	Wed 1/1/20	Thu 12/31/20	[Summary Bar]																											
23	First Amended DRC to USPS Parcel & Recording	144 days?	Sun 3/1/20	Tue 9/15/20	[Progress Bar]																											
24	First Amended DRC to Proastio Parcel & Recording	96 days?	Wed 1/1/20	Tue 5/12/20	[Progress Bar]																											
25	First Amended DRC to Duck Pond Parcel & Recording	133 days?	Wed 7/1/20	Thu 12/31/20	[Progress Bar]																											
26	Task 4 - Corrective Measures - Soil	264 days	Wed 1/1/20	Thu 12/31/20	[Summary Bar]																											
27	Complete PCB IMWP Implementation	153 days?	Fri 1/3/20	Sat 8/1/20	[Progress Bar]																											
28	PCB IMWP Implementation Reporting	197 days?	Thu 1/2/20	Wed 9/30/20	[Progress Bar]																											
29	Perform Annual Soil Cap Inspections	44 days	Tue 9/1/20	Fri 10/30/20	[Progress Bar]																											
30	Task 5 - Corrective Measures - GW / LNAPL	264 days	Wed 1/1/20	Thu 12/31/20	[Summary Bar]																											
31	RW-08-14 LNAPL Recovery System O&M	262 days?	Fri 1/3/20	Thu 12/31/20	[Progress Bar]																											
32	RW-08-14 Shutdown & Site Tn Testing	98 days?	Sat 8/1/20	Tue 12/15/20	[Progress Bar]																											
33	USPS Pkg Lot LNAPL Area 11 Well Abandonment & Installation (Schedule TBD)				[Summary Bar]																											
34	Fiero Property VI SOW Implementation & Reporting	155 days?	Mon 6/1/20	Thu 12/31/20	[Progress Bar]																											
35	Task 6 - Groundwater Monitoring	264 days	Wed 1/1/20	Thu 12/31/20	[Summary Bar]																											
36	Finalize & Submit 2019 Report	33 days?	Wed 1/1/20	Fri 2/14/20	[Progress Bar]																											
37	Annual Groundwater Sampling	4 days	Sat 10/5/19	Wed 10/9/19	[Progress Bar]																											
38	Prepare & Submit 2020 Report	50 days	Fri 10/23/20	Thu 12/31/20	[Progress Bar]																											
39	Well Repair, Protection and Abandonment Activities	142 days	Tue 6/2/20	Tue 12/15/20	[Progress Bar]																											
40	Task 7 - Storm Sewers (Seep)	264 days	Wed 1/1/20	Thu 12/31/20	[Summary Bar]																											
41	Seep ReInjection System OM&M & Reporting	262 days	Fri 1/3/20	Thu 12/31/20	[Progress Bar]																											
42	Fiero Prior Storm Sewer Impact Resolution Response to USEPA	87 days?	Wed 1/1/20	Wed 4/29/20	[Progress Bar]																											
43	Duck Pond CACC Finalization (Schedule TBD)				[Summary Bar]																											

RACER PNC/Fiero 2020 Schedule
Date: Thu 7/9/20

Task		Summary		External Milestone		Inactive Summary		Manual Summary Rollup		Finish-only	
Split		Project Summary		Inactive Task		Manual Task		Manual Summary		Progress	
Milestone		External Tasks		Inactive Milestone		Duration-only		Start-only		Deadline	