

Transmitted via Electronic Mail

Mr. Jeremy Pepin
Environmental Engineer
Michigan Department of Environment, Great Lakes, and Energy
Materials Management Division
Hazardous Waste Section
Permitting and Program Support Unit
Constitution Hall, South Tower, 4th Floor, SW Corner
525 W. Allegan Street
P.O. Box 30241
Lansing, Michigan 48909-7741

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

Subject:

Semi-Annual Progress Report No. 6
Revitalizing Auto Communities Environmental Response (RACER) Trust
Buick City Site, Flint, Michigan

Reference:

30215500

Date:

January 22, 2025

Dear Mr. Pepin:

On behalf of Revitalizing Auto Communities Environmental Response Trust (RACER), Arcadis of Michigan, LLC (Arcadis) is submitting this Semi-Annual Progress Report No. 6 to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) for the Buick City Site located in Flint, Michigan (the Site) (**Figure 1**). This report is submitted in accordance with the requirements of Section 8.9.3 of the Corrective Action Consent Order (CACO), MMD Order No. 111-02-2020, which became effective on August 5, 2020.

This Semi-Annual Progress Report No. 6 covers the period of July 1, 2024, through December 31, 2024, and summarizes the work performed, data collected, problems encountered, project schedule, and estimated percent complete for a list of ongoing Site activities. Areas of the Site and specific Site features discussed herein are presented on **Figure 2** (Northend of the site), **Figure 3** (Southend of the Site), and **Figure 4** (Building 04 and Hamilton Avenue Areas).

WORK PERFORMED

The list below provides a summary of the work conducted from July 1, 2024, to December 31, 2024. Site work included collecting approximately 61 groundwater samples and 11 storm/sanitary sewer samples and included the following activities:

Compliance

- Conducted storm water pollution prevention plan (SWPPP) semi-annual inspection in September.
- Completed inspections and boom maintenance (as necessary) of Outfalls 002, 003, 004, and 005.
- Completed quarterly P-trap inspections associated with the French drain flowing into the Outfall 005 storm sewer.
- Completed the semi-annual inspection of select surface cover areas.

Remedy Design, Implementation, and OMM

- In September an interim measure was completed to address surface runoff to Hamilton Avenue. A berm was installed downgradient of the existing trench to redirect surface runoff on Site and help prevent it from entering Hamilton Avenue.
- In October eight groundwater samples were collected from the Factory 36 Area and the Southend-Lear property to monitor groundwater conditions.
- In December four samples were collected from the Hamilton Avenue sanitary sewer to evaluate potential remedy options.
- In December additional field activities were completed at the Outfall 011 storm sewer to collect additional information to facilitate treatment system design activities.

PFAS Investigation

- In July two groundwater samples at the Former Lagoon Area were collected to monitor per- and polyfluoroalkyl substances (PFAS) concentrations.
- In August 24 groundwater samples were collected in the Building 04/Hamilton Avenue Area to monitor PFAS concentrations.
- In December 19 groundwater samples were collected from the Lagoon Area to monitor groundwater conditions following the completion of interim measures (IMs) and to evaluate impacts downgradient of the area.

Redevelopment

- In August, the first round of groundwater/storm sewer samples was collected, following the beginning of concrete removal at the 65-acre parcel north of Leith Street. This Short-term Construction Monitoring (STCM) event consisted of collecting 4 groundwater samples and 3 samples from manholes/storm sewer structures.
- In December the second round of groundwater/storm sewer samples was collected, following the beginning of concrete removal at the 65-acre parcel north of Leith Street. This STCM event consisted of collecting 4 groundwater samples and 3 samples from manholes/storm sewer structures.

DATA COLLECTED

The samples collected as part of Site investigation or monitoring activities during this reporting period are presented below. A flat file of the Site analytical data, a CADD file including sampling locations, and recently completed boring logs and well abandonment logs was uploaded to the RACER SharePoint Site in December 2024.

Groundwater Samples

Groundwater samples were collected at the Site as part of various investigation and/or monitoring activities at the Site as follows:

Month	Factory Area	Number of Samples	Number of Locations	Analytes
July	Lagoon	2	2	PFAS
August	Bldg. 04/Hamilton Ave	24	14	PFAS
August	STCM	4	4	PAL VOCs, PAL SVOCs, PAL Metals (dissolved and total), PFAS
October	Factory 36	6	6	PAL VOCs
October	Southend – Lear Property	2	2	PAL VOCs
December	STCM	4	4	PAL VOCs, PAL SVOCs, PAL Metals (dissolved and total), PFAS
December	Lagoon	19	15	PFAS

Storm and Sanitary Sewer Water Samples

Samples were collected from multiple storm sewers and analyzed as part of various investigation and/or monitoring activities at the Site, as follows:

Month	Storm Sewer Sample Location	Number of Samples	Analytes
August	Outfall 005 P-traps	2	VOCs, SVOCs, metals, PFAS, PCBs
August	MH 3-9	1	PCBs, project analyte list (PAL) VOCs, PAL SVOCs, PAL Metals (dissolved and total), PFAS
December	Outfall 005 P-traps	2	VOCs, SVOCs, metals, PFAS, PCBs
December	MH 3-9	1	PCBs, PAL VOCs, PAL SVOCs, PAL Metals (dissolved and total), PFAS, Low-level mercury
December	MH 11-6	1	PFAS, PCB, Benzene, Ethylbenzene, Toluene, Xylene, TPH, select metals, TOC, TSS, TDS, Sulfate, Nitrate-N, Chloride, Hardness, Alkalinity, Phosphorus, Ammonia-N, Available Cyanide, BOD, MBAS
December	Hamilton Avenue Sanitary Sewer	4	PFAS, PCB, Benzene, Ethylbenzene, Toluene, Xylene, TPH, select metals, TOC, TSS, TDS, Sulfate, Nitrate-N, Chloride, Hardness, Alkalinity, Phosphorus, Ammonia-N, Available Cyanide, BOD, MBAS

PROBLEMS ENCOUNTERED

Sanitary Sewer Issue

The City of Flint provided updated sampling data from a manhole in the sanitary sewer system located in Industrial Avenue, south of Hamilton Avenue. PFAS was detected PFOS at 380 ng/L, while previous data was below the GSI and surface water Rule 57 criteria of 12 ng/L. This sampling was initiated as part of the City’s periodic PFAS sampling and analysis to assess compliance with the proposed NPDES sanitary sewer effluent limits at the Publicly Owned Treatment System. In December, Arcadis completed field work to collect additional data on groundwater infiltration into the sanitary sewer line network along Hamilton Avenue south of the Site and its potential impact on downgradient concentrations in the sanitary sewer

system. The data are being evaluated to determine how address the issue. The City of Flint and the EGLE are aware of the issue and being kept informed of progress.

Outfall 011 Treatment System

As part of the Outfall 011 storm sewer reroute project, it was determined that a collection system was needed for the abandoned portion of the sewer where PFAS impacted groundwater will continue to infiltrate through broken street drains and the existing manholes. In September, Arcadis was tasked with designing the system in conjunction with the reroute which delayed completion of the reroute design. The design will be completed in first quarter of 2025 with implementation planned for Second quarter 2025.

Outfall 005

During routine inspections of Outfall 005 on July 22 and August 8, 2024, following precipitation events an LNAPL sheen was observed outside of the containment booms in the Flint River. Maintenance activities were completed at the outfall after the releases were identified. Following the observations of sheen in the river, the absorbent booms maintained in upgradient manholes along the Outfall 005 storm sewer were inspected. No LNAPL was observed on any of the absorbent booms during any inspections indicating that the source of the sheen is not associated with the Site.

PROJECT SCHEDULE

Near-Term Milestone Activities Anticipated During the Next Semi-Annual Period

Site work for the first and second quarters of 2025 includes the following ongoing Site Activities:

- Continue to perform inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Dispose of waste as necessary.
- Continue quarterly P-trap inspections associated with the French drain flowing into the Outfall 005 storm sewer per the PCB Pollutant Minimization Plan under the NPDES permit.
- Continue semi-annual SWPPP inspections.
- Continue inspection of surface covers.
- Continue quarterly STCM sampling.

In addition, the following activities are planned to be continued/completed in first and second quarters.

- Complete design, procure contractor and implement remedy at Outfall 011 storm sewer.
- Continue sanitary sewer PFAS evaluation and implement interim measure/remedy.
- Install soil cover at SI #31/32 benzo(a)pyrene and manganese impact area.

- Continue PFAS evaluation/investigation at Outfall 002, 003, 010 and 013 storm sewers.
- Continue off-Site vapor intrusion evaluation/investigation.
- Continue groundwater evaluation at Factory 36 Area.
- Complete PFAS data collection and evaluation at Building 04 'Hotspot' Area.
- Complete PFAS groundwater sampling at Foam Generation Building (FGB) and Factory 84 Area.
- Complete inspection of Site bulkheads.
- Complete semi-annual SWPPP Report for the NPDES permit.
- Submit revised declaration of restrictive covenant.
- Continue STCM monitoring during construction activities.

ESTIMATED PERCENT COMPLETE

This section presents a percentage complete for action items outlines in the CACO:

- Reconcile List of AOIs, AOCs, TSCA areas, etc. (Due Nov 3, 2020) – 100%
- Meeting with EGLE to discuss CA objectives, expectations, etc. (Due August 20, 2020) -100%
- Establish public document repository (Due September 4, 2020) – 100%
- Public Involvement/Communications Plan (Due September 4, 2020) – 100%
- Corrective Action Framework (Due Nov 3, 2020) – 100%
- List of electronic files submitted to EGLE (Due February 1, 2021) – 100%
- Semi-annual progress reports – ongoing
- Need to identify investigation, further corrective action or EGLE approved institutional control for WMU 2, WMU 3, WMU 4, WMU 5, WMU 7 and WMU 10 – 100%
- CMS workplan (Due 90 days after approval of CAF) – 0%
- CMS field work (to start within 30 days of CAF WP approval) – 0%
- CMS Report (Due 60 days after completion of CMS activities) – 0%
- CM Implementation Plan (Due within 90 days of EGLE approval of the CMS) – 0%
- CA440 Remedy Decision (Due 10/15/22) – 0%
- C550RC Remedy Constructed (Due 12/31/24) – 0%
- CA800YE Ready for Reuse (6/1/24) – 0%

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- CA 900Cr Performance Standards Attained (Due 9/30/26) – 0%
- CA750 – Re-Evaluated for PFAS – 0%

If you have any questions, please contact me.

Sincerely,

Arcadis of Michigan, LLC

A handwritten signature in blue ink that reads "Micki M. Maki".

Micki Maki
Senior Technical Lead

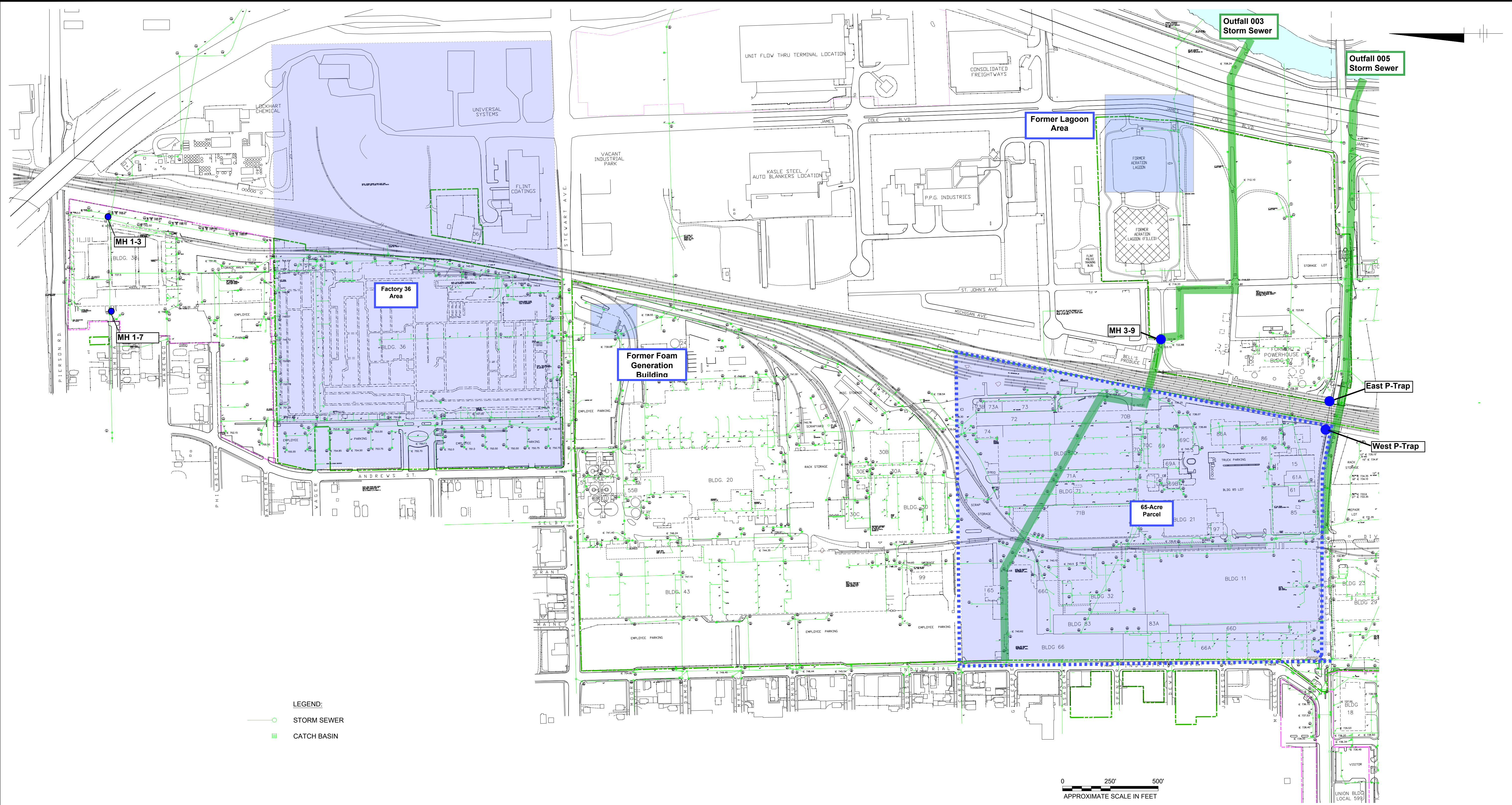
Copies:

Brendan Mullen, RACER Trust (via email)
Evin Maguire, EGLE (via email)
Chris Peters, Arcadis (via email)
Flint Public Library

Attachments:

Figure 1 –Site Location Map
Figure 2 – Northend Work Areas
Figure 3 – Southend Work Areas
Figure 4 – Building 04/Hamilton Avenue Work Areas

CITY OF FLINT: ENVIRONMENTAL SERVICES DIVISION, 300 W. WASHINGTON ST., 48824-1000, FLINT, MI 48824-1000. PROJECT: RACER TRUST BUICK CITY FLINT, MICHIGAN. DRAWING: NORTHEND WORK AREAS. DATE: 10/20/2021. TIME: 10:54 AM. PLOTTED: 10/20/2021 10:54 AM. BY: OBERLANDER, ROSEANNE



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NORTHEND WORK AREAS


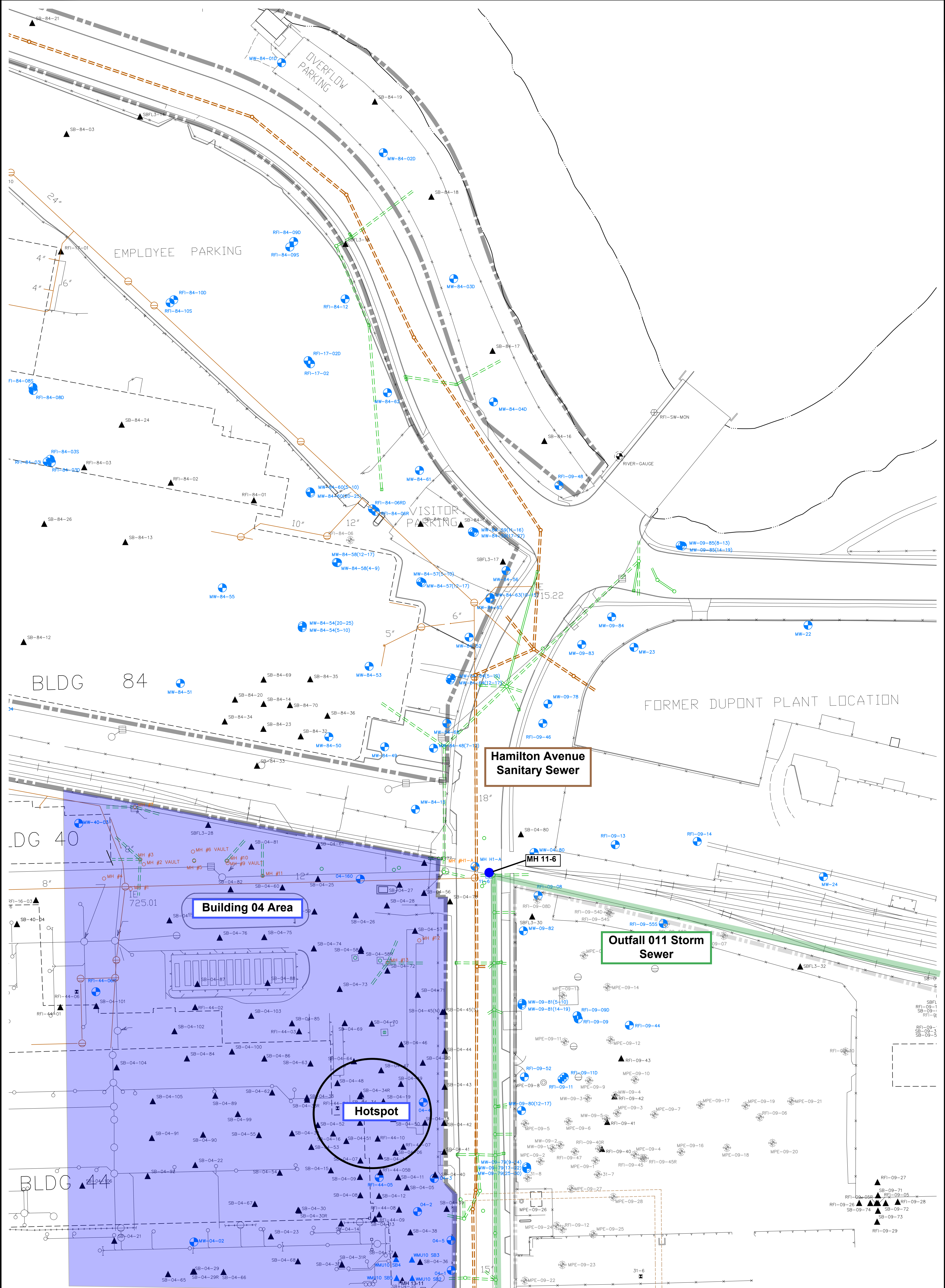
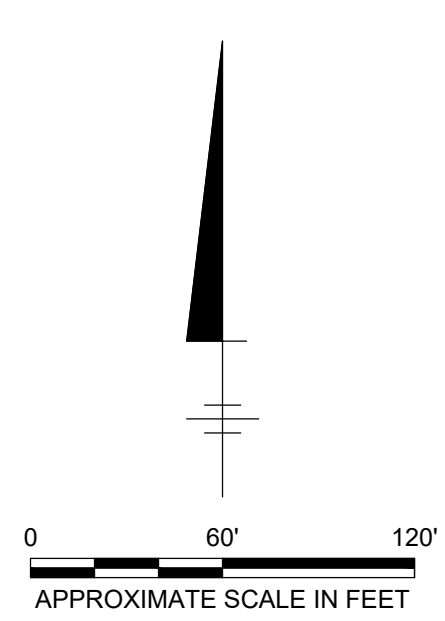

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FIGURE
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- LEGEND:**
- | | |
|-----------------------------|---------------------------------|
| ▲ SOIL BORING | ⊗ RIVER GAUGE |
| ⊗ ABANDONED MONITORING WELL | ⊗ UNABLE TO LOCATE |
| ⊕ MONITORING WELL (ACTIVE) | — HISTORICAL STORM SEWER LINE |
| ⊖ PIEZOMETER | — STORM SEWER LINE (2018) |
| ⊙ RECOVERY WELL | — SANITARY SEWER LINE |
| ⊠ SOIL GAS POINT | --- RACER TRUST PROPERTY FORMER |
| ⊡ SUB-SLAB MONITORING POINT | --- RACER TRUST PROPERTY |
| ⊙ TRANSECT POINT | |
| ⊕ SURFACE WATER | |



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**BLDG 04/HAMILTON AVENUE
 WORK AREAS**

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FIGURE
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