

Transmitted via E-mail

January 12, 2017

Mr. Brandon Pursel (pursel.brandon@epa.gov)  
U.S. Environmental Protection Agency, Region 5  
Land and Chemicals Division  
77 West Jackson Blvd., DE-9J  
Chicago, IL 60604-3590

RE: Second Half 2016 Progress Report  
Performance-Based Administrative Order on Consent  
RCRA Corrective Action  
Flint West Facility #12990  
Flint, Michigan  
USEPA ID No. MIK204011722<sup>A</sup>

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Dear Mr. Pursel:

In accordance with paragraph 24.b. of the Performance-Based Administrative Order on Consent, Docket No. 05-2011-0021 (AOC), 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 the second half of 2016 (July 1, 2016 through December 31, 2016).

Please contact me if you would like to discuss this matter further. Thank you.

Sincerely,



Michael Smith  
Technical Services Manager

A – Note that this facility is identified as USEPA ID No. MID005356654 in the Administrative Order on Consent for this facility. However the correct USEPA ID No. is MIK204011722.

Attachment A – Second Half 2016 Progress Report

C: Grant Trigger, RACER  
David Favero, RACER

ATTACHMENT A  
SECOND HALF 2016 PROGRESS REPORT  
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT  
FLINT WEST FACILITY - #12990, FLINT, MICHIGAN  
July 1, 2016 to December 31, 2016

WORK PERFORMED THIS PERIOD

- Submitted the First Half 2016 Progress Report to the USEPA on July 13, 2016.
- Prepared and submitted a Data Report to the USEPA on August 3, 2016, which summarized the April, May and June 2016 groundwater monitoring event.
- Gauged all wells in October and November, 2016. No NAPL was encountered.
- Sampled all wells (with the exception of two dry wells) in October and November, 2016. Samples were analyzed for VOCs, and the following metals (total and dissolved): arsenic, chromium (total and hexavalent), copper, lead, selenium, and zinc.
- Provided additional information to the USEPA regarding the November 1, 2014 draft Corrective Measures Proposal.
- Prepared and submitted to the USEPA on October 7, 2016, a Draft Work Plan for Hydrogen Release Compound (HRC) Pilot Test.

DATA COLLECTED THIS PERIOD

Groundwater Monitoring

- Received data from laboratory for wells gauged and sampled in October and November, 2016. The data will be submitted in a Data Report in January, 2017. Samples were analyzed for VOCs, and the following metals (total and dissolved): arsenic, chromium (total and hexavalent), copper, lead, selenium, and zinc.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

- No problems were encountered.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- RFI Phase II Sampling Matrix Preparation and Fieldwork Implementation  
(Proposed 2012 activities) 100%  
  
The 2012 portions of the proposed Phase II investigation included in the June 26, 2012, Phase I Data Report were completed and included the completion and sampling of 13 soil borings, eight of which were finished as monitoring wells. Soil and groundwater samples (from the 8 new and 5 previously-installed monitoring wells) were collected and were analyzed for ten MDEQ Metals including Chromium VI, VOCs (USEPA 8260), and PNAs (USEPA 8310).
- RFI Phase II Data Report Preparation 100%  
(Submitted February 12, 2013)
- Human Health EI (CA725) Report 100%  
(Submitted July 1, 2013)
- Data Report Preparation 100%  
(Additional investigations and groundwater monitoring)  
(Submitted July 9, 2013)
- Data Report Preparation 100%  
(Additional well installation and groundwater monitoring)  
(Submitted October 12, 2013)
- Groundwater Migration under Control EI (CA750) 100%  
(Submitted March 1, 2014)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted March 18, 2014)
- Data Report Preparation 100%  
(April, 2014 additional investigations and groundwater monitoring)  
(Submitted June 23, 2014)
- Data Report Preparation 100%  
(June, 2014 groundwater monitoring and July 2014 additional soil investigations)  
(Submitted October 3, 2014)
- Draft Corrective Measures Proposal 100%  
(Submitted November 1, 2014)
- Data Report Preparation 100%  
(December, 2014 additional soil investigation and groundwater monitoring)  
(Submitted February 13, 2015)

- Data Report Preparation (Groundwater monitoring) (Submitted August 12, 2015) 100%
- Data Report Preparation (Groundwater monitoring) (Submitted February 23, 2016) 100%
- Data Report Preparation (Groundwater monitoring) (Submitted August 3, 2016) 100%
- Draft Work Plan for Hydrogen Release Compound (HRC) Pilot Test Preparation (Submitted October 7, 2016) 100%
- Data Report Preparation (Groundwater monitoring - October and November, 2016) (To be submitted January, 2017) 50%

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Finalize and submit a Data Report for the October and November, 2016 groundwater sampling. (January, 2017)
- Implement Hydrogen Release Compound (HRC) Pilot Test (to be determined).
- Gauge and sample monitoring wells (analyze for VOCs and the following metals (total and dissolved): arsenic, chromium (total and hexavalent), copper, lead, selenium, and zinc) in April, 2017.
- Prepare and submit a Data Report for the April, 2017 groundwater monitoring event in May, 2017.
- Review, discuss and respond to any USEPA comments on the draft Corrective Measures Proposal, Draft Work Plan for Hydrogen Release Compound (HRC) Pilot Test, or Data Reports.
- A Corrective Measures Implementation (CMI) Work Plan will be submitted within 90 days of approval of the selected corrective measures alternative. The CMI Work Plan will include a draft Declaration of Restrictive Covenant, details for the HRC injection, details for groundwater monitoring, and an implementation schedule. (Depending on the schedule of and comments from USEPA's review of the CMP.)
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, and Data Report(s), as appropriate.