

Mr. Nate Nemani
U.S. Environmental Protection Agency Region 5
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Subject:

Semi-Annual Progress Report, January 2018 – June 2018
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 10, 2018

Contact:

Brad Saunders

Phone:

517 974 4441

Email:

Brad.Saunders@arcadis.com

Our ref:

B0064607.2018

Dear Mr. Nemani:

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, 2018 through June 30, 2018 for the portions of the Pontiac North Campus (PNC or Site) for which RACER Trust is responsible for remediation.

Work Performed from January 1, 2018 through June 30, 2018

(Includes references to reports which provide relevant details and data collected)

- Completed a summary report of October 2017 PCB-impacted soil delineation activities and submitted to USEPA on February 27, 2018. Planned and completed additional PCB-impacted soil delineation activities in AOI W-1/LNAPL Area No. 1/7 from March 19-22, 2018 to more accurately delineate the horizontal and vertical extent of PCB impacts in soil greater than 100 ppm and submitted the results of the investigation to USEPA on May 8, 2018. In addition, planned and completed additional PCB-impacted soil delineation activities on June 21-22, 2018.
- Refined previously developed cross-sections of proposed excavation areas based on the results of March 2018 PCB-impacted soil delineation activities and commenced preparation of an Interim Measures Soil Removal Work

Plan in accordance with RCRA and TSCA regulations to excavate PCB-impacted soils with concentrations exceeding 100 ppm.

- On March 3, 2018, re-staked the boundaries of two TSCA soil cap areas on Parcel 14-20-276-001 (north of USPS property).
- Completed field activities to gauge, characterize and perform transmissivity testing for LNAPL at three monitoring well locations in AOI W-1/LNAPL Area No. 1/7 on January 17, January 29, and February 19, 2018. Prepared an Interim Measures Feasibility Confirmation and Pre-Design Specification Testing memorandum and submitted to USEPA on April 27, 2018. Based on the results of field activities, additional LNAPL gauging, transmissivity testing, and pre-design removal testing activities are scheduled for July 2018.
- Completed a planned 4th quarterly groundwater sampling and analytical testing event on January 15-16, 2018 for the Supplemental 1,4-D / VOC Investigation at the southwest Fiero and USPS southwest property boundaries. Submitted a summary memorandum report to USEPA on June 13, 2018 presenting the results of the two-year supplemental investigation and recommending installation of an additional monitoring well and adjustments to the annual groundwater sampling program for future monitoring.
- Completed the 2017 Annual Groundwater Monitoring Report and submitted to USEPA on February 20, 2018.
- Submitted a Well Abandonment Request to USEPA on March 7, 2018 recommending the abandonment of 116 permanent and 53 temporary monitoring wells located both on and off the Site.
- Scheduled the 2018 annual groundwater monitoring event for the week of October 2, 2018.
- Conducted routine inspections of Montcalm Street from January through March for ice accumulating as a result of the seep and below freezing temperatures, and regularly applied salt to mitigate icing on the street.
- Based on the results of Montcalm seep re-injection pilot testing conducted in December 2017, prepared and submitted an Injection Test Summary Memo Report to USEPA and MDEQ on January 31, 2018. Based on the results of the testing and feedback from USEPA and MDEQ, prepared a hydrogeologic cross-section from the seep to injection area, incorporated other revisions and supplements to the plan, and completed and submitted a revised Montcalm Seep Interim Measures Work Plan to USEPA and MDEQ on April 13, 2018. Received final MDEQ approval via a letter dated June 8, 2018 and USEPA's approval to proceed via an email dated June 25, 2018. Began the process to procure equipment and a contractor for implementation of the approved Work Plan.
- Continued support and coordination with existing property owners.

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 submitted to 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 (9/19/12)	100%
• 2012 Budget Amendment 3 approved (9/19/12)	100%
• 2013 Budget Authorization approved (1/25/13)	100%
• Draft CMP Report submitted to USEPA (3/15/13)	100%
• 2013 Budget Amendment 1 approved (7/18/13)	100%
• 2013 Budget Amendment 2 approved (11/12/13)	100%
• 2014 Budget Authorization approved (11/20/13)	100%
• 2014 Budget Amendment 1 approved (5/23/14)	100%
• 2015 Budget Authorization approved (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 (11/20/15)	100%
• 2016 Budget Amendment 1 approved (9/9/16)	100%
• 2017 Budget Authorization approved (11/22/16)	100%
• 2018 Budget Authorization approved (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%
• Revised Draft PNC CMS submittal to USEPA	85%
• 2018 Budget Amendment Request No. 1	75%

Corrective Measures – Institutional Controls

• Draft Declaration of Restrictive Covenants (DRCs)	50%
• 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%
• Amendment to DRC for the former Plant 14 South property	25%
• Recorded DRC for the USPS property (April 2018)	100%

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 (Field Work Jun 2018)	75%
• PCB-impacted Soil Interim Measures Removal Work Plan	50%

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 (1/30/15)	100%
• Draft PCB Investigation Summary Memo submitted (2/6/15)	100%
• Additional PCB LNAPL Delineation activities (Apr-June 2015)	100%
• Draft 2014-2015 PCB Investigation Summary memo (8/17/15)	100%
• Supplemental Site (USPS Property) Characterization Summary Report submitted (7/21/16)	100%
• Supplemental Soil Gas Data Evaluation Memo (USPS Property) submitted (9/1/16)	100%
• Supplemental 1,4-Dioxane Investigation Summary Report (12/7/17)	100%
• LNAPL Interim Measures Feasibility Confirmation and Pre-Design Specification Testing memorandum (4/27/18)	100%
• Supplemental 1,4-Dioxane/VOC Groundwater Investigation Summary Report (6/13/18)	100%

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%

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)	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 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%

Project Schedule – Work to be Completed During Next Reporting Period

A task-based Gant chart for the 2018 Project Schedule is attached. Items scheduled to be completed during the next reporting period:

- Prepare a Budget Amendment Request as necessary to support additional efforts related to general corrective measures and the final decision process, soil corrective measures, and implementation of the Montcalm seep re-injection system.
- Complete and submit the 2018 PCB Soil Additional Delineation Report.
- Complete and submit a Draft PCB Soil Removal IM Work Plan.
- Procure and contractor, implement the Montcalm Seep IM Work Plan, and conduct baseline monitoring.
- Install an additional monitoring well along the Fiero southwest property boundary for continued evaluation for off-site VOC migration.
- Complete the Annual 2018 groundwater monitoring event integrating supplemental wells to evaluate 1,4-D and off-site VOC migration.
- Complete additional LNAPL Pre-Design and Transmissivity Testing.
- Develop LNAPL skimming IM work plan.
- Support the final decision process and continue updating and development of the CMS.
- Respond to any comments received from USEPA or MDEQ on submittals or other matters.

Problems Encountered

None

Mr. Nate Nemani
U.S. Environmental Protection Agency
July 10, 2018

Should you have any questions on the information provided within this progress report, please feel free to contact me.

Sincerely,

Arcadis of Michigan, LLC



Brad Saunders, PE (MI)
Principal Engineer

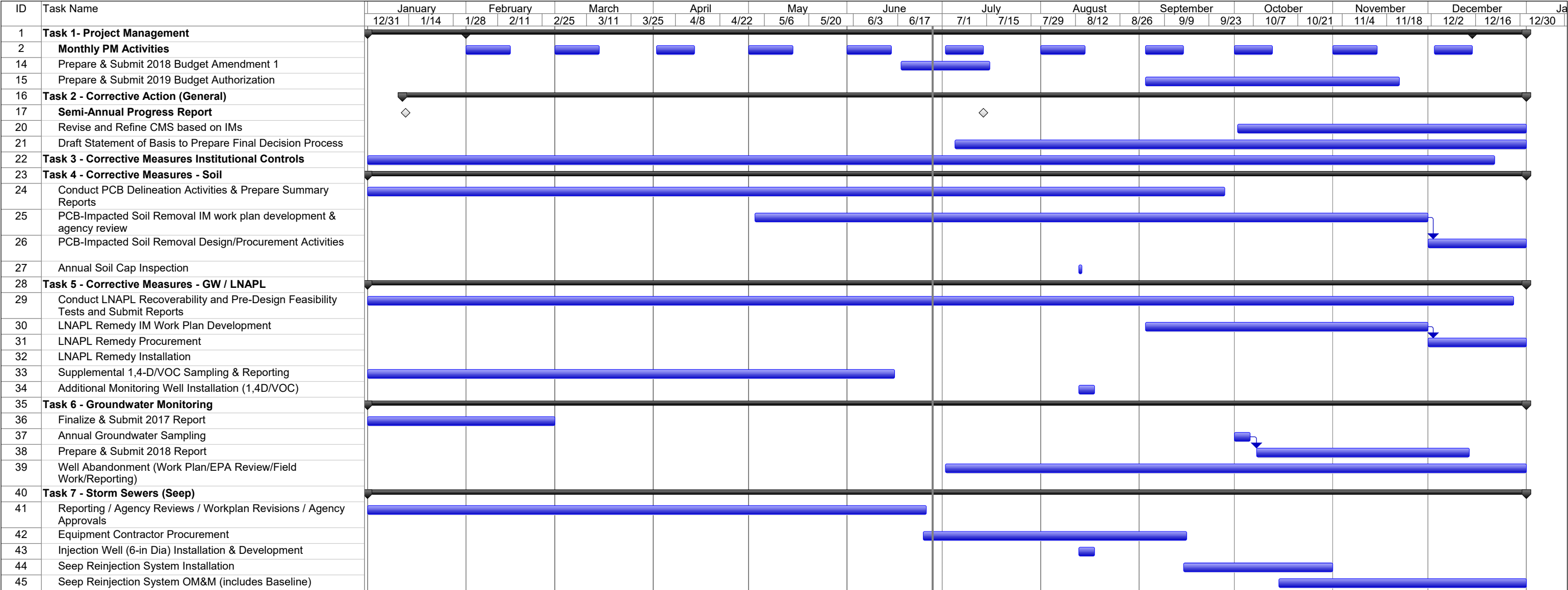
Copies:

Dan Dailey, MDEQ
Dave Favero, RACER
File

Enclosure:

Attachment

1 2018 Project Schedule



Project: PNC 2018 Schedule
Date: Thu 6/28/18

Task

Split

Milestone

Summary

Project Summary

External Tasks

External Milestone

Inactive Task

Inactive Milestone

Inactive Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

Start-only

Finish-only

Progress

Deadline