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Our ref: 12573440-LTR-20

July 15, 2025

Ms. Jennifer Stanhope
Acting Supervisor, Corrective Action Section 1
Remediation Branch
Land, Chemicals, and Redevelopment Division
U.S. EPA Region 5
77 West Jackson Blvd., LR-16J
Chicago, Illinois 60604-3590

1st 2025 Semi-Annual Progress Report
Performance Based Administrative Order on Consent
Docket Number RCRA 05 2011 0025
Eckles Road Site, Livonia, Michigan
USEPA ID No. MID 005 356 621

Dear Ms. Stanhope:

In accordance with the Performance Based Administrative Order on Consent between the U.S. Environmental Protection Agency Region 5 (USEPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for the 1st half of 2025 (January 1, 2025, through June 30, 2025).

Please let us know if you would like to discuss further. Thank you.

Regards,

A handwritten signature in blue ink, appearing to read "Chris Meincke", with a stylized flourish at the end.

Chris Meincke
Associate

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CJM/Is/LTR-20

Encl: Attachment A – 1st 2025 Semi-Annual Progress Report

Copy to: Sam Cairns, EGLE
William Burbidge, GLWA
Pam Barnett, RACER
Brendan Mullen, RACER
Jeff Crum, Hamp, Mathews & Associates

Attachment

Attachment A

1st Semi-Annual 2025 Progress Report

Attachment A

1st 2025 Semi-Annual Progress Report Performance-Based Administrative Order on Consent Eckles Road Site, Livonia, Michigan January 1, 2025 to June 30, 2025

1. Description of Work Completed

- Continued Pilot Shutdown of the Area 1 southern French Drain Collection Trench and Groundwater Treatment system (GWTP). Great Lakes Water Authority (GLWA) has been updated on operations. During the second half of 2024 the system collected and discharged 0 gallons of groundwater following commencement of the GWTP shutdown pilot test the end of March 2024. Monthly discharge totals are presented in Table 1. Sump elevation control points for pump operation were adjusted at the end of March 2024 to begin the activities proposed in the Area 1 Groundwater Treatment Plant Pilot Shutdown Work Plan (GHD, March 19, 2024). On March 30, 2024, the sump elevation control points were adjusted from between 693.3 feet above mean sea level (ft. amsl) and 695.3 ft amsl to between 697.0 ft amsl and 698.0 ft amsl. The groundwater elevation within the sump has equalized to approximately 696 ft amsl through June 2025. Groundwater elevation measurements were collected periodically from the French drain sump located within Area 1 and select monitoring wells as described in the Area 1 Groundwater Treatment Plant Pilot Shutdown Work Plan, as well as periodic downloads of transducer groundwater elevation data from monitoring wells inside and outside the Area 1 Barrier Wall. Monitoring locations are provided on Figure 1.
- Submitted a *Proposed Phase 3 Sanitary Sewer Vapor Sampling Work Plan* dated January 9, 2025 to USEPA. USEPA approval of the work plan was issued January 16, 2025 with conditions, which were effectively addressed in a revised version submitted on January 28, 2025.
- Submitted the 2nd 2024 Semi-Annual Progress Report dated January 15, 2025, to USEPA.
- Submitted a *Fall 2024 Seasonal Groundwater and Soil Vapor sample Results and Sanitary Sewer Vapor Sample Results* technical memorandum dated January 30, 2025 to USEPA. A revised technical memorandum dated April 4, 2025 was submitted to USEPA to address March 5, 2025 comments and an additional revised technical memorandum dated April 14, 2025 was submitted to address table and figure corrections.
- Submitted a *Revised AOI 31 VIAP Interim Measure Work Plan* dated February 5, 2025 for leading-edge remedial activities based on additional comments from USEPA dated December 6, 2024. Received USEPA approval with conditions via letter dated February 20, 2025. Submitted a *Revised AOI 31 VIAP Interim Measure Work Plan* on June 17, 2025 incorporated corrected figure references.
- Submitted a *Single Well Response Test Results technical memorandum dated March 11, 2025 to USEPA.*
- Submitted a *Sanitary Sewer Video Recording Review Summary* technical memorandum dated April 4, 2025 to USEPA.
- Submitted a *Proposed Sanitary Sewer Water Sampling Work Plan* dated June 19, 2025 to USEPA. A revised work plan was submitted on June 23, 2025 to address USEPA comments received on June 20, 2025. Received USEPA approval via letter dated June 26, 2025.
- Implemented sanitary sewer televising activities in January 2025.
- Completed Post-Construction and Interim Measure Performance Area 1 Groundwater Monitoring sampling activities March 5, 2025 through March 7, 2025. Area 1 performance monitoring well locations are presented on Figure 1.

- Collected winter seasonal groundwater and soil gas samples from existing AOI 31 monitoring wells and soil gas probes during March 2025, according to the Phase 2 Work Plan as access to residential properties permitted.
- Implemented the AOI 31 Interim Measures for the Vapor Intrusion to Indoor Air Pathway as described in the Revised Work Plan. Pre-implementation utility clearances and pre-injection characterization activities were conducted February 2025. Interim Measure injections were conducted April 2025 through June 2025. AOI 31 IM Performance Monitoring wells were installed in June 2025.
- Collected 24-hour crawl space and indoor air samples from Home 23 on January 23 and 24, 2025.
- Collected 24-hour crawl space and indoor air samples from Home 18 on April 2 and 3, 2025.
- Installed three soil vapor implants and redeveloped two existing groundwater monitoring wells at Home 3 on April 22, 2025. Soil vapor samples were collected from the three implants and groundwater samples were collected from the two monitoring wells on April 23, 2025.
- Collected sanitary sewer water samples on June 24, 2025.
- Collected passive, 14-day sanitary sewer vapor samples (plus quality assurance sample) from four manhole locations on Grantland Street, one manhole location on Amrhein Road, and one manhole location on Newburgh Road between April 25 and May 2, 2025, according to the Phase 3 Work Plan.
- Submitted interim sample results packages and proposed sampling plans to USEPA for discussion during virtual meetings.
- Participated in virtual meetings with USEPA on March 13, 2025, March 19, 2025, April 8, 2025, April 14, 2025, April 21, 2025, and June 17, 2025 to discuss the AOI 31 off-site vapor intrusion Pathway investigation and evaluation updates, discuss strategy and work plan development for the leading edge remedy and “phased” seasonal VI pathway assessment and TCE plume extent for AOI 31.
- Submitted a semi-annual report to GLWA dated March 17, 2025, for the October 2024 through February 2025 reporting period.
- Participated in meetings with City of Livonia staff, and off-site residents, as necessary, regarding proposed leading edge assessment and remedial activities.

2. Data Collected

- A Summary of Monthly Groundwater Treatment Plant Discharge Volumes is provided in Table 1.
- A summary of off-site groundwater, soil gas, and sanitary sewer vapor sample results from the Winter 2025 seasonal sampling event will be provided under separate cover.
- A summary of groundwater elevations and sample results associated with the Area 1 Construction/Performance Monitoring activities through April 2025 will be provided under separate cover.
- Draft AOI 31 Vapor Intrusion water and soil gas results data packages were provided to USEPA for discussion purposes and development of subsequent scopes of work related to the sanitary sewer gas evaluation activities. A summary of fall seasonal sampling activities will be provided under separate cover.

3. Problems Encountered

- None.

4. Task Status and Information Summary for Selected Activities

- O&M of the Groundwater Pump & Treat System (GWTP, Barrier Wall, Cover) – In Progress
Continued operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system on an as-needed basis. Chromium VI and nickel treatment is no longer required to discharge to the sanitary sewer under GLWA special discharge permit. GAC installed to treat PFOS. Submitted appropriate discharge reports as per the Special Discharge Permit. Also see below item - PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring.
- Long-Term Groundwater Monitoring On-going – In Progress
Long-Term Groundwater Monitoring Plan proposed 5 years of monitoring to verify continued stability/reduction in off-Site/boundary concentrations (anticipated completion 2006 through 2010). Sampling activities are currently planned to continue pending USEPA approval to cease monitoring. Also see below item - PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring.
- Maintenance of the AOI 39 Dust Control Plan - Complete
- Restrictive Covenants - Complete
- Vapor Intrusion Investigation – Complete
(Task 1 VIAP activities are complete – See also AOI 31 Long-Term VI Pathway Monitoring and Groundwater TCE Remediation below)
- Installation of Vapor Mitigation System – Complete (Two homes)
O&M and Performance Monitoring of Vapor Mitigation System On-going System performance monitoring is being implemented annually. Latest system performance monitoring completed December 2024 at two homes.
- Area 1 Pilot Tests - Alternative Chemicals & Target In-Situ Treatment Injection - Complete
- Groundwater Treatment System Decommissioning & Removal for Area 1 - Complete
- Completion Report & Well Abandonment – Not started
Anticipated to be completed in 2037 per May 2010 RCES but this is likely to change given the interim measure being implemented for Area 1.
- AOI 31 Long-Term VI Pathway Monitoring and Groundwater TCE Remediation – In Progress
A Phase 2 VI Work Plan was submitted in 2023 and revised based on USEPA comments. Additional Geoprobe groundwater grab sample borings were installed to delineate the side-gradient edges of the plume, along with delineating the leading edge extents of the plume. Additional Phase 3 investigation activities were conducted in June 2024 to delineate the leading edge of the plume. Seasonal groundwater and soil vapor sampling activities continued through 2024 in general accordance with the Phase 2 and Phase 3 Work Plans. An interim measure to install a permeable reactive barrier at the leading edge was implemented April 2025 through June 2025. Four quarters of performance monitoring will be initiated in July 2025. A review of mid-plume remedial alternatives was initiated in 2025 to evaluate potential actions to reduce the concentrations of TCE in groundwater in the center of the plume and reduce long-term loading at the leading edge PRB installed in 2025.

A sanitary sewer VIAP evaluation was initiated in 2024 to evaluate the presence of TCE in sanitary sewer gas and evaluate the potential pathway to indoor air. Sanitary sewer gas samples were collected in 2024 and 2025. The sanitary sewer line was televised in 2025 to evaluate potential infiltration of impacted groundwater.

- Area 1 Remedial Implementation – Metals - Complete
- Area 1 PFAS and Metals Characterization - Complete
- PFAS Remedy/Interim Measure Evaluation - Complete
- PFAS Treatability Pilot Tests - Complete
- PFAS Remedy/Interim Measure Design - Complete
- PFAS Remedy/Interim Measure Implementation - Complete
- PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring - In Progress

The previous groundwater treatment plant (GWTP) was supplemented with granular activated carbon in April 2020 to remove PFAS from collected groundwater. Groundwater was collected and treated by the GWTP on an as-necessary basis (responding to precipitation events and generally maintaining the groundwater within the Area 1 Barrier Wall at depths greater than 3 feet bgs) from December 2018 through January 2021 to manage groundwater elevations within the Area 1 Barrier Wall. Since February 2021 groundwater has been collected and treated on an on-going basis. Certain groundwater treatment components were removed from the former GWTP building and relocated into a Conex box. New pump and control components were installed as part of the Interim Measure implementation activities in 2021. Construction monitoring and interim measure performance monitoring groundwater samples were collected from on-site monitoring wells in 2021, 2022, 2023, 2024, and 2025. O&M tasks are anticipated to change based on implementation and evaluation of the interim measure. A GWTP Pilot Shutdown Work Plan was submitted to USEPA in March 2024 and the GWTP was shutdown down on March 30, 2024 to evaluate the long term recovery of groundwater elevations and potential migration of impacted groundwater from Area 1. Groundwater elevations within the contained area remain stable and the shutdown of the GWTP and groundwater monitoring activities continued through June 2025. A plan for ongoing O&M will be developed after an evaluation of the GWTP pilot shutdown and Interim Measure performance monitoring and groundwater elevation monitoring is completed.

5. Summary of Contacts with Interested Parties

- Correspondence with GLWA regarding Special Discharge Permit activities and required reporting.
- Residents are updated on a one-on-one basis to maintain privacy of VI pathway risk evaluations at their homes.
- Participated in community update meetings with the City of Livonia and residents regarding the AOI 31 vapor intrusion pathway investigation and evaluation activities.
- Property owners south of Area 1 are updated on a one-on-one basis for access to sample monitoring wells as necessary.

6. Changes in Personnel

- None.

7. Projected Work for Next Reporting Period (July 2025 through December 2025)

- Prepare this 1st 2025 Semi-Annual Progress Report
- Continue to work with USEPA and EGLE to address Area 1 impacts and with GLWA to address any discharge issues if the GWTP is restarted.
- Continue monitoring groundwater elevations and operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system in accordance with the approved Construction Groundwater Monitoring Plan and Revised Interim Measures Work Plan – Area 1 and GWTP Pilot Shutdown Work Plan.
- Evaluate potential AOI 31 mid-plume remedial alternatives.
- Provide a summary of the winter 2025 AOI 31 seasonal groundwater and soil gas sampling activities.
- Provide a summary of Area 1 groundwater sampling results and elevation monitoring activities through April 2025.
- Implement AOI 31 VIAP Interim Measure performance monitoring for the leading edge.
- Conduct a vapor mitigation system performance evaluation at two homes.
- Continue to the sanitary sewer VIAP evaluation activities.
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, as appropriate.

Attachments: Table 1 – Summary of Monthly Groundwater Treatment Plant Discharge Volume
Figure 1 – Construction and Performance Monitoring Locations

Table

Table 1

**Summary of Monthly Groundwater Treatment Plant Discharge
Area 1 - Former Plating Area
Eckles Road Site
Livonia, Michigan**

Monthly GWTP Discharge Volume (Gallons)	
Month	
January 2025	0
February 2025	0
March 2025	0
April 2025	0
May 2025	0
June 2025	0
Total January 2025 to June 2025 Discharge	0

Notes:
GWTP Pilot Shutdown initiated March 30, 2024

Figure

