Transmitted via Electronic Mail

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Mr. Kevin Lund
Michigan Dept of Environment, Great Lakes and Energy
MMD – Jackson District Office
301 E. Louis Glick Hwy
Jackson, Mi 49201

Subject:
Semi-Annual Progress Report No. 2
Revitalizing Auto Communities Environmental Response (RACER) Trust
Buick City Site, Flint, Michigan

Reference:
30075935

Date:
October 15, 2021

Dear Mr. Lund:

On behalf of Revitalizing Auto Communities Environmental Response Trust (RACER), Arcadis is submitting this Semi-Annual Progress Report No.2in accordance with Section 8.9.3 of the RACER Trust's Corrective Action Consent Order (Consent Order), MMD Order No. 111-02-2020 for the Buick City Site located in Flint, Michigan (the Site) (**Figure 1**), which was effective on August 5, 2020.

This Semi-Annual Progress Report No. 2 covers the period of April 2, 2021 through September 30, 2021 and briefly summarizes the work performed to date, 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** (Bldg 04 and Hamilton Avenue Areas).

1. Work Performed

The list below provides a summary of the work conducted from April 1, 2021 through September 30, 2021 at the Buick City Site. Site work include completing 110 soil borings and collecting approximately 310 soil samples and 133 groundwater samples.

- In April 2021, groundwater samples were collected from six wells in the Building 4 area to facilitate the evaluation of potential remedies. Samples were analyzed for VOCs, SVOCs, metals, PCBs, and PFAS, alkalinity, BOD, COD, hardness, nitrate, pH, sulfate, TDS and TSS to facilitate remedy evaluation. In May 2021, storm sewer manhole MH 10-5 was filled with concrete to eliminate impacted groundwater infiltration into the structure.
- On May 5, 2021, an incremental sampling (IS) investigation was completed at the soil/sediment stockpile on the western aeration lagoon to characterize the pile for PFAS.
- On May 6, 2021, temporary plugs were installed in the sanitary storm sewer at manholes MH H-1 and MH H-1A. Subsequent samples collected downgradient of the plugs showed a significant decrease in PFAS concentrations.
- On May 26 and 27, 2021, six test pits were completed in the Building 04 area to collect soil samples for bench scale testing and to investigate subsurface structures identified on boring logs and old site drawings.
- On June 8-9, 2021, a sediment thickness investigation was completed in the eastern aeration lagoon to estimate the volume of sediment in the pond. In addition, soil and surface water samples were collected and analyzed for PFAS.
- From July 12 through July 14, 2021, a hydraulic profiling tool (HPT)/vertical aquifer profiling (VAP) investigation was completed east of the former aeration lagoons to characterize groundwater flow and potential PFAS impacts in groundwater.
- On July 16, 2021, a temporary plug was installed at storm sewer manhole MH 11-6 to block flow coming from the former Outfall 009 storm sewer, which connects to Outfall 011 and manhole MH 11-6.
- On July 21, 2021, four soil samples were collected from the Factory 81 area to refine the extent of arsenic impacts.
- In August 2021, to better understand groundwater migration and fate and transport of PFAS monitoring wells were installed in Hamilton Avenue and off-Site south of Hamilton Avenue..
- On August 4, 2021, near Leith Street a video was completed of a portion of the Outfall 003 storm sewer to identify potential sources of infiltration, discharge, or collapse along a lateral from an offsite location to the north which enters the vault at manhole MH 3-6. In addition, a video was completed of a portion of the Outfall 011 storm sewer to identify potential sources of impacts identified in recent samples.

- From August 10 through 12, 2021, fourteen manhole structures north of the Building 04 Area near Hamilton Avenue were filled with concrete to minimize flow within Site storm and sanitary sewer laterals to the storm and sanitary sewers in Hamilton Avenue with the goal of relieving hydraulic head pressure in the Hamilton Avenue/CSX railroad area and eliminating daylighting of groundwater. After the completion of filling activities groundwater levels were gauged to monitor any changes in elevations as a result of the filling activities.
- Additional manhole filling activities were completed on August 27, September 1, and September 2, 2021. Five manhole structures north of the Building 04 Area were filled with bentonite and concrete to minimize flow to the storm and sanitary sewers in Hamilton Avenue with the goal of relieving hydraulic head pressure in the Hamilton Avenue/CSX railroad area.
- On August 30, 2021, a video was completed of the Outfall 003 storm sewer upgradient of manhole 3-6 to try and identify potential blockages.
- On August 31 through September 2, 2021 a geophysics survey was completed in the Building 04 area of the Site to provide additional characterization of potential historical subsurface building foundations and other obstructions which may affect remedy selection/implementation.
- On September 13, 2021, temporary plugs were installed in two laterals along the Outfall 011 storm sewer to eliminate PFAS impacted discharges to the sewer from those laterals.
- On September 14, 2021, bulkheads were installed along Outfall 010 at manholes MH10-4 and MH 10-2 to eliminate the Site's contribution of PFAS to Outfall 010 from those two manholes.

In addition to the specific Site activities noted above, various Site investigation activities were completed as listed below:

- PFAS soil and groundwater delineation investigation continued at the Former GM Foam Generation Building and Former Aeration Lagoons in the Northend of the Site and Building 04, Building 12, and Building 16, and Factory 84 Areas in the Southend of the Site.
- Soil samples were collected from the Building 04 Area to delineate benzo(a)pyrene impacts.
- Soil samples were collected from the Power Plant area and field south of the former aeration lagoons to characterize the area.
- Samples were collected from select manholes along storm sewer Outfall 002 and 003 for PFAS analysis to evaluate the post Outfall 003 re-route conditions.
- Wet weather samples were collected from the Outfall 004, 004A, 007, 007A, 008 and 012 outfalls for PFAS analysis to complete the short-term water characterization study required by EGLE

- Additional PFAS investigation samples were collected from storm sewer Outfalls 002, 003, 004, 005, 010, 011, and 012 and the sanitary sewer in Hamilton Avenue.
- NPDES required weekly PCB sampling was completed at the Outfall 003 storm sewer.

2. Data Collected

The samples collected as part of Site investigation or monitoring activities since April 1st are discussed below.

2.1 Storm Sewer Water Samples

2.1.1 NPDES Sampling

As required per Part 1, Section A 2 in the current National Pollution Discharge Elimination System (NPDES) Permit No. MI0001597, weekly composite samples were collected from Monitoring Point 003A. This data will be included in the 2021 Yearly Pollutant Minimization Plan (PMP) for PCBs report, which will be submitted to the Michigan Department of Environment, Great Lakes and Energy (EGLE) as required in the NPDES permit.

2.1.2 PFAS Sampling

In addition to the NPDES samples, storm sewer samples were collected from multiple storm sewers from April through September and analyzed for PFAS, as part of various investigation and/or monitoring activities at the Site, as follows:

In April, the following storm sewer samples were collected:

- Four samples were collected from Outfall 003 and select manholes along the storm sewer at the Northend of the Site.
- Four samples were collected from Outfall 0010 and select manholes along the storm sewer at the Southend of the Site.
- Two samples were collected from an Outfall 011 manhole at the Southend of the Site.

In May, the following storm sewer samples were collected:

- Four samples were collected from Outfall 002 and select manholes along the storm sewer at the Northend of the Site.
- One sample was collected from a manhole along the Outfall 003 storm sewer at the Northend of the Site.
- One wet weather sample was collected from Outfall 004 at the Northend of the Site.
- One wet weather sample was collected from Outfall 004A at the Northend of the Site.

- Five samples were collected from select manholes along the Outfall 005 storm sewer at the Northend of the Site.
- One wet weather sample was collected from Outfall 007 at the Southend of the Site.
- One wet weather sample was collected from Outfall 007A at the Southend of the Site.
- One wet weather sample was collected from Outfall 008 at the Southend of the Site.
- Two samples were collected from Outfall 010 and a manhole along the storm sewer at the Southend of the Site.
- One sample was collected from a manhole along the Outfall 011 storm sewer at the Southend of the Site.
- One wet weather sample was collected from Outfall 012 at the Southend of the Site.

In June, the following storm sewer samples were collected:

- Seven samples were collected from Outfall 002 and select manholes along the storm sewer at the Northend of the Site.
- Nine samples were collected from Outfall 003 and select manholes along the storm sewer at the Northend of the Site.
- One sample was collected from a manhole along the Outfall 004 storm sewer at the Northend of the Site.
- Five samples were collected from select manholes along the Outfall 005 storm sewer at the Northend of the Site.
- One wet weather sample was collected from Outfall 007 at the Southend of the Site.
- One wet weather sample was collected from Outfall 007A at the Southend of the Site.
- One wet weather sample was collected from Outfall 008 at the Southend of the Site.
- Three samples were collected from Outfall 010 and select manholes along the storm sewer at the Southend of the Site.
- One wet weather sample was collected from Outfall 012 at the Southend of the Site.

In July, the following storm sewer samples were collected:

- Two samples were collected from a manhole along the Outfall 011 storm sewer at the Southend of the Site.

In August, the following storm sewer samples were collected:

- Eight samples were collected from manholes along the Outfall 011 storm sewer at the Southend of the Site.
- Four samples were collected from Outfall 010 and select manholes along the storm sewer at the Southend of the Site.

In September, the following storm sewer samples were collected:

- Two samples were collected from the Outfall 010 storm sewer.
- Three samples were collected from a manhole along the Outfall 011 storm sewer.

2.2 Sanitary Sewer Water Samples

The following samples were collected and submitted for PFAS analysis:

- In April, six samples were collected from select sanitary sewer manholes along Hamilton Ave.
- In May, four samples were collected from select sanitary sewer manholes along Hamilton Ave.
- In August, one sample was collected from a sanitary sewer manhole along Hamilton Ave.
- In September, one sample was collected from a sanitary sewer manhole along Hamilton Ave.

2.3 Groundwater Samples

In April, the following samples were collected and submitted for laboratory analysis of PFAS except as noted below:

- Nine samples were collected from monitoring wells at the former aeration lagoon near Leith Street.
- Six borehole water samples were collected from borings/temporary wells completed at the Former GM Foam Generation Building near Stewart Street.
- Sixteen borehole water samples were collected from borings/temporary wells completed at the Building 4 Area near Hamilton Avenue.
- Six borehole water samples were collected from borings/temporary wells completed at the Building 04 Area near Hamilton Avenue. The samples were submitted for laboratory analysis of VOCs, SVOCs, metals, PCBs, alkalinity, BOD, COD, hardness, nitrate, pH, sulfate, TDS, and TSS to facilitate remedy evaluation.

In May, the following samples were collected and submitted for laboratory analysis of PFAS:

- Four borehole water samples were collected from borings/temporary wells completed at the

Building 16 Area near Hamilton Avenue.

- Seventeen borehole water samples were collected from borings/temporary wells completed at the Building 4 Area near Hamilton Avenue.
- Five samples were collected from monitoring wells at the former GM Foam Generation Building near Stewart Street.
- Thirty-four borehole water samples were collected from borings/temporary wells completed at the former Building 04 Area located in the Southend of the Site.
- Eleven borehole water samples were collected from borings/temporary wells completed at the former Factory 84 Area located in the Southend of the Site.

In June, the following samples were collected and submitted for laboratory analysis of PFAS:

- One borehole water sample was collected from boring/temporary well completed at the Building 16 Area near Hamilton Avenue.
- Three borehole water samples were collected from borings/temporary wells completed at the Building 12 Area near Hamilton Avenue.
- Six borehole water samples were collected from borings/temporary wells completed at the Building 4 Area near Hamilton Avenue.
- One borehole water sample was collected from borings/temporary wells completed at the former aeration lagoons Area near Leith Street.
- Two samples were collected from monitoring well at the former GM Foam Generation Building near Stewart Street.
- Five samples were collected from monitoring wells at the south of Hamilton Avenue.
- Three samples were collected from monitoring wells near the Leith Street underpass.
- One sample was collected from a monitoring well at Building 16 near Hamilton Avenue.

In July, the following samples were collected and submitted for laboratory analysis of PFAS

- One sample was collected from a vertical aquifer profile location at the former aeration lagoon near Leith Street.
- One sample was collected from a monitoring well location at the former GM Foam Generation Building near Stewart Street.
- Two borehole water samples were collected from borings/temporary wells completed at the

Building 16 Area near Hamilton Avenue.

- Three borehole water samples were collected from borings/temporary wells completed at the Building 12 Area near Hamilton Avenue.
- Two borehole water samples were collected from borings/temporary wells completed at the Building 4 Area near Hamilton Avenue.

In August, the following groundwater samples were collected and submitted for laboratory analysis of PFAS:

- Ten samples were collected from monitoring wells installed in Hamilton Avenue.
- Six samples were collected from monitoring wells installed near the former aeration lagoons near James P. Cole Boulevard.

In September, the following groundwater samples were collected and submitted for laboratory analysis of PFAS:

- Fourteen samples were collected from borings/temporary wells in the former aeration lagoon area near James P. Cole Boulevard.
- Four samples were collected from monitoring wells installed near the former aeration lagoons near James P. Cole Boulevard.
- Five borehole water samples were collected from borings/temporary wells completed at the Building 4 Area near Hamilton Avenue.

2.4 Soil Samples

In April, the following soil samples were collected:

- Eight soil samples were collected from four locations in the former Building 04 Area at the Southend of the Site. The samples were submitted for laboratory analysis of benzo(a)pyrene.
- Eight soil samples were collected from four locations in the field south of the aeration lagoon at the Northend of the Site. The samples were submitted for laboratory analysis of PCBs, PFAS and metals.

In May, the following soil samples were collected and submitted for laboratory analysis of PFAS except as noted below:

- One soil sample was collected from 28 incremental sampling locations at the former aeration lagoon soil pilea at the Northend of the Site.

- Twenty-three soil samples were collected from seven locations in the former Building 04 Area at the Southend of the Site. The samples were submitted for laboratory analysis of benzo(a)pyrene.
- Fifty-five soil samples were collected from 9 locations in the former Building 04 Area at the Southend of the Site.
- Four soil samples were collected from four locations in the power plant area at the Northend of the Site.
- Twenty-one soil samples were collected from six locations in the Building 12 area at the Southend of the Site.
- Thirty-one soil samples were collected from nine locations in the Building 16 area at the Southend of the Site.
- Ten soil samples were collected from six test pit locations in the Building 4 area at the Southend of the Site.

In June, the following soil samples were collected and submitted for laboratory analysis of PFAS:

- Eleven soil samples were collected from three locations in the former Building 04 Area at the Southend of the Site.
- Six soil samples were collected from three locations in the Building 12 area at the Southend of the Site.
- Eight soil samples were collected from two locations in the Building 16 area at the Southend of the Site.
- Twelve soil samples were collected from six locations in the former aeration lagoon area at the Northend of the Site.

In July, the following soil samples were collected and submitted for laboratory analysis of PFAS except as noted below:

- Eight soil samples were collected from two locations in the former Building 04 Area at the Southend of the Site.
- Eight soil samples were collected from eight locations in the former aeration lagoon area at the Northend of the Site.
- Five soil samples were collected from five locations in the Factory 81 area at the Northend of the Site. The samples were submitted for laboratory analysis of arsenic.

In August, the following soil samples were collected and submitted for laboratory analysis of PFAS

except as noted below:

- Twenty-one soil samples were collected from seven locations in Hamilton Avenue at the Southend of the Site.
- Four soil samples were collected from four locations in the power plant area at the Northend of the Site. The samples were submitted for laboratory analysis of VOCs, SVOCs, metals, PCBs.
- Five soil samples were collected from two locations in the former aeration lagoon area at the Northend of the Site.

In September, the following soil samples were collected and submitted for laboratory analysis of PFAS:

- Thirty-nine soil samples were collected from ten locations in the former Building 04 Area at the Southend of the Site.

2.5 Surface Water/Seep Samples

In June, one surface water samples were collected from the Eastern Lagoon Area the former aeration lagoon. The sample was submitted for analysis of metals, TOC, PFAS, alkalinity, nitrate, pH, sulfate, TDs and TSS to facilitate remedy evaluation.

Also, two samples of daylighting water at the Building 4 Area were collected in June and September. The samples were submitted for chlorine, fluoride, and/or PFAS.

2.6 Sediment Samples

In June, four sediment samples were collected from the Eastern Lagoon at the former aeration pond at the Site. The samples were submitted for laboratory analysis of PFAS.

3. Problems Encountered

3.1 Daylighting Groundwater near Hamilton Avenue

Daylighting groundwater was identified at the Site near Hamilton Avenue (Building 04 Area) at four locations from June through September 2021. Daylighting was identified at Seeps #2 and #3 on June 28 through July 11, 2021 and July 26 through the 28, 2021 following two significant (>2-inch) rain events. On August 10 through 12, 2021 concrete was placed to fill the seeps and sewer manholes to minimize flow in the storm and sanitary sewers in this area. No additional daylighting has been identified at these locations.

August 13 through August15, 2021 daylighting groundwater was identified at Seep #4 following a significant (1.63-inch) rain event. On August 27 through September 2, 2021, concrete was placed to fill the seep and sewer manholes to minimize flow in the storm and sanitary sewers in this area. No additional daylighting has been identified at this location.

From September 25 through October 1, 2021 daylighting groundwater was identified at Seep #5 following a significant (> 3.5 inches over 4 days) rain event.

During each daylighting event water ponded at the surface, flowed into Hamilton Avenue, and entered a curb drain connected to Outfall 011. Samples were collected from Seep #2 and Seep #5 and submitted for PFAS analysis. It is thought that the daylighting events are due to significant rain events in a short period of time, elevated groundwater levels in this portion of the Site; and hydraulic head pressure in the storm and sanitary sewers at the Site. As discussed above, concrete has been placed in select manhole structures in the Southend of the Site to relieve the hydraulic head pressure and to aid in reducing groundwater levels in this portion of the Site; therefore, reducing the chances of future daylighting events. In addition, as shown on Figure 4, the most recent seep identified at the Site is much further north (further away from Hamilton Avenue) than Seeps #1 and #3, likely due to the activities discussed above.

3.2 Outfall 002 Manhole Leakage

Following completion of the Outfall 003 reroute, water samples were collected from both the Outfall 002 and 003 storm sewers. Based on PFAS detections in the Outfall 002 storm sewer, the new manholes in this area were inspected. Base flow was stopped and the manholes dewatered. Groundwater leaks were observed at Manhole 2-18 and 2-18-1. Arcadis and RACER are working with the contractor to repair the manholes and establish follow-up inspections.

4. Project Schedule – Near-Term Milestone Activities Anticipated During the Next Semi-Annual Period

Site work for the fourth quarter of 2021 and first quarter of 2022 includes the following ongoing Site Activities:

- Continue OMM inspections of 003/004 Stormwater Treatment and Diversion System until the system is decommissioned.
- Continue to perform inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Dispose of waste as necessary.
- Continue to perform inspections of Oil Interceptor #2 until it is decommissioned.
- Continue Outfall 003A weekly sample collection for PCBs, pending the consent order from EGLE.
- 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.

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

- Decommissioning 003/004 Stormwater Treatment and Diversion System
- Cleaning/decommissioning of Oil Interceptor #2
- Complete semi-annual SWPPP Report for the NPDES permit
- Continue delineation of Site PFAS impacts
- Complete Feasibility Study and Interim Measures Workplans for Building 04 Area, Former GM Foam Generation Building, Aeration Lagoon Area, and Outfall 005 storm sewer.
- Continue addressing PFAS impact at Outfalls and sanitary sewer

5. 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 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% (Note that EGLE did not request that the actual electronic files could be submitted in batches following the February 1 submittal. That process is ongoing.)
- 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 – 15%
- 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%
- 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

Micki Maki

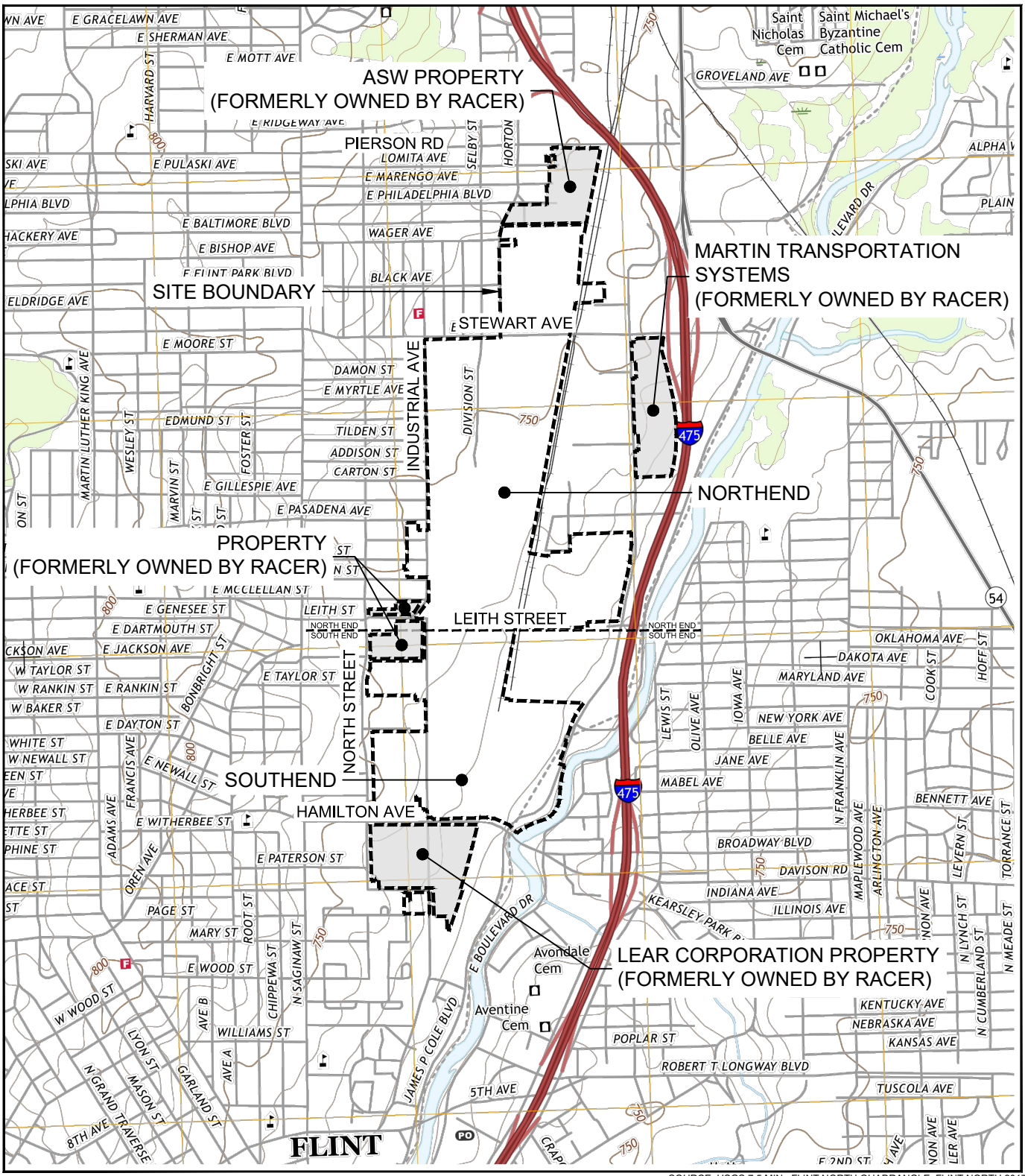
Senior Technical Lead

Copies:

Grant Trigger, RACER Trust (via email)
Dave Favero, RACER Trust (via email)
Flint Public Library

Attachments:

Figure 1 – RACER Buick City Site Map
Figure 2 – Northend Work Locations
Figure 3 – Southend Work Locations
Figure 4 – Hamilton Avenue Work Locations



SOURCE: USGS 7.5 MIN., FLINT NORTH QUADRANGLE, FLINT NORTH 2017

0 2000' 4000'

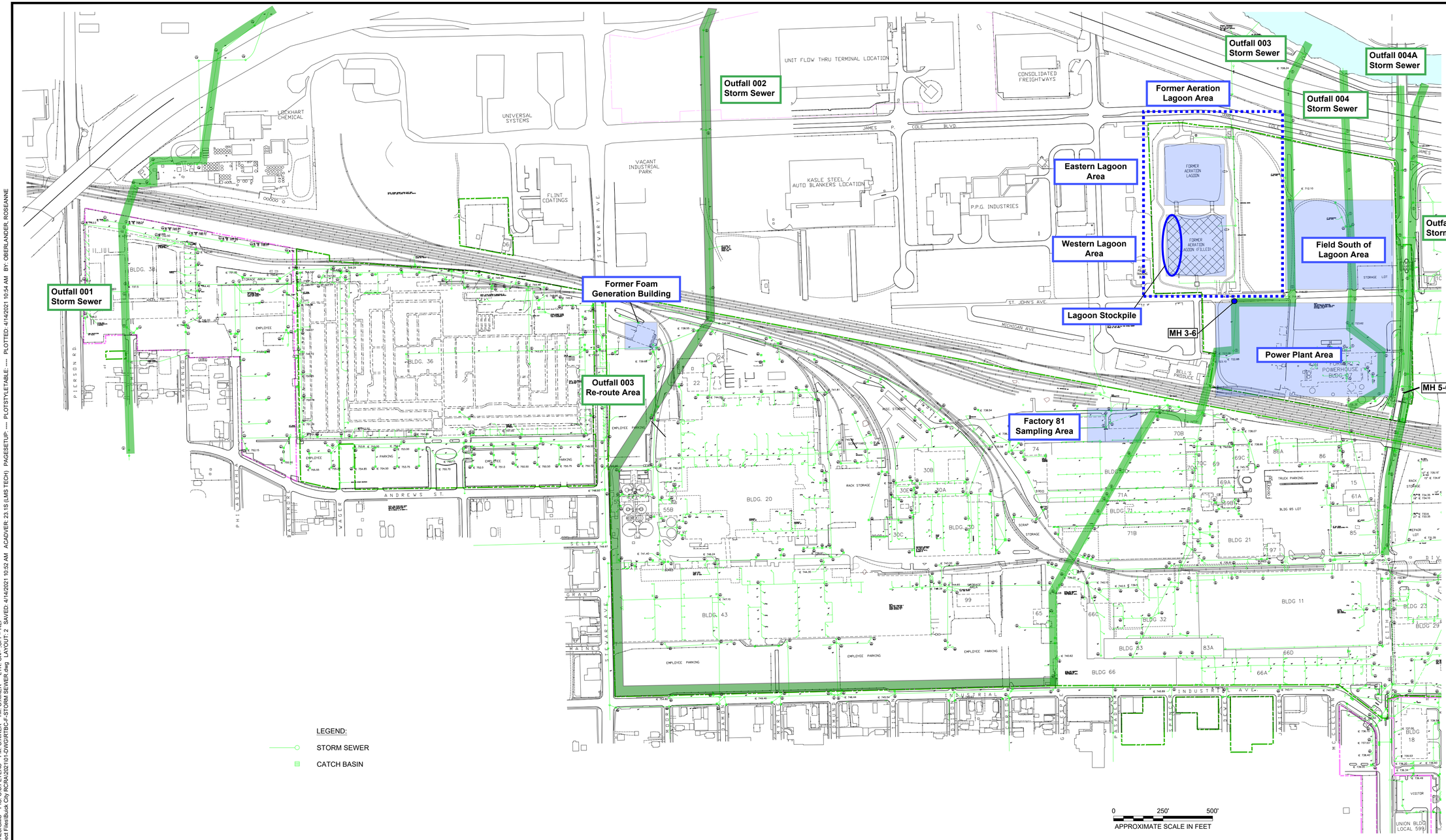
APPROXIMATE SCALE IN FEET

RACER TRUST
BUICK CITY
FLINT, MICHIGAN

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE 1



LEGEND:

STORM SEWER

CATCH BASIN

0 250' 500'

APPROXIMATE SCALE IN FEET

RACER TRUST
BUICK CITY
FLINT, MICHIGAN

NORTHEND WORK AREAS

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

Outfall 005
Storm Sewer

Outfall 007

Outfall 007A

Outfall 008

See Figure 4

Sanitary
Sewer

Outfall 010

Outfall 012

Outfall 011

Factory 84 Area

Outfall 010
Storm Sewer

South of Hamilton
Avenue Area

Outfall 011
Storm Sewer

Building 16 Area

Building 04 Area

Building 12 Area

Daylighting
Groundwater
Area

Hamilton Avenue
Area

FLINT RIVER

JAMES P. COLE BLVD

BIVISION ST

HAMILTON AVENUE

INDUSTRIAL AVE

NORTH ST

OAK TECHNOLOGY PARK

OAK PARK

WOOD ST. OUTFALL 013

LEGEND:

STORM SEWER

CATCH BASIN

SANITARY SEWER

SANITARY MANHOLE

MANHOLES FILLED WITH CONCRETE

0 250' 500'

APPROXIMATE SCALE IN FEET

RACER TRUST
BUICK CITY
FLINT, MICHIGAN

SOUTHEND WORK AREAS

ARCADIS Design & Consultancy for natural and built assets

FIGURE
3

CITY: SYRACUSE DIV/GROUP: ENV DB: A.SANCHEZ LD: ALS/GMS PIC: C.S.PETERS PM: C.KIKER TM: C.KIKER LYR: ON=*;OFF=*REF*
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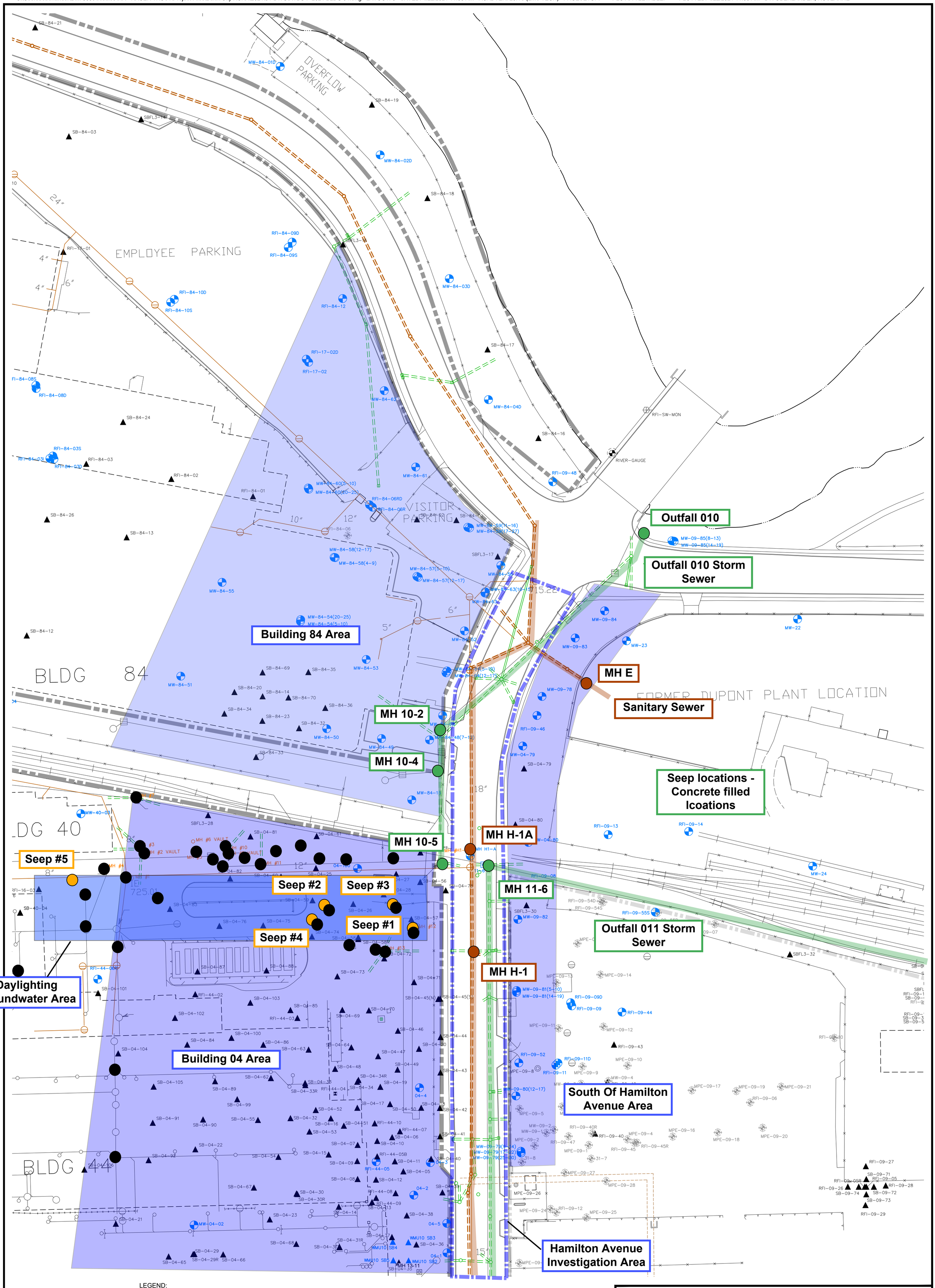

LEGEND:

- SOIL BORING
- ABANDONED MONITORING WELL
- MONITORING WELL (ACTIVE)
- PIEZOMETER
- RECOVERY WELL
- SOIL GAS POINT
- SUB-SLAB MONITORING POINT
- TRANSECT POINT
- SURFACE WATER
- RIVER GAUGE
- UNABLE TO LOCATE
- HISTORICAL STORM SEWER LINE
- STORM SEWER LINE (2018)
- SANITARY SEWER LINE
- RACER TRUST PROPERTY FORMER
- RACER TRUST PROPERTY
- MANHOLE FILLED WITH CONCRETE

0 60' 120'
APPROXIMATE SCALE IN FEET

RACER TRUST
BUICK CITY
FLINT, MICHIGAN

BLDG 04/HAMILTON AVENUE WORK AREAS

ARCADIS Design & Consultancy for natural and built assets

FIGURE
4