



April 15, 2016

Transmitted via E-mail

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

**Re: Semi-Annual Progress Report (October 2015 through March 2016)  
RCRA Corrective Action Performance-Based Voluntary Agreement  
Van Buren Landfill, Van Buren, Michigan**

Dear Mr. Pursel:

In accordance with paragraph V.4.b. of the Performance-Based Voluntary Agreement (PVA), 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 October 1, 2015 through March 31, 2016. The Mannik & Smith Group, Inc. is submitting the attached progress report on behalf of RACER.

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

Sincerely,

A handwritten signature in blue ink that reads "Francis J. Biehl".

Francis J. Biehl, PE  
Project Manager

Attachment A – Semi-Annual Progress Report (October 2015 – March 2016)

**Cc: David Favero, RACER  
Grant Trigger, RACER**



**TECHNICAL SKILL.  
CREATIVE SPIRIT.**

R2330017\_RPT\_FJB\_April\_2015\_Semiannual Progress Report.FINAL.docx

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ATTACHMENT A  
SEMI-ANNUAL PROGRESS REPORT  
PERFORMANCE-BASED VOLUNTARY AGREEMENT  
VAN BUREN TOWNSHIP LANDFILL, VAN BUREN, MICHIGAN  
October 1, 2015 to March 31, 2016

WORK PERFORMED THIS PERIOD

- Conducted semi-annual ground water sampling and analysis of all of the permanent monitoring wells installed during the Phase I thru IV investigation activities – November 2015
- Prepared the Draft Corrective Measures Study (submitted to the USEPA on October 2, 2015)
- Conducted ground water sampling and analysis of monitoring well CRA-266M located in the northeastern portion of the RACER Trust Willow Run site in conjunction with the semi-annual ground water sampling and analysis. – November 2015
- Performed inventory (water or soils amount) of drums located within Van Buren Landfill-December 2015Continued coordination with the Wayne County Airport Authority (WCAA) for access to install two monitoring wells on the Willow Run Airport property. A license agreement was executed with and required permits were obtained from WCAA.
- Conducted soil boring and monitoring well installation at two locations (SB-60/MW-35 and SB-61/MW-36) within Willow Run Airport-March 2016
- Technical action items: data reviews and progress reporting – ongoing

NEW DATA AVAILABLE THIS PERIOD

- Soil and ground water samples were collected by MSG, as discussed above. Laboratory analytical data has been received and was included in the "November 2015 Semi-Annual Groundwater Sampling Results" and the "General Motors Property – November 2015 Semi-Annual Groundwater Sampling Results" reports submitted on March 25, 2016.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

A license agreement was finalized with WCAA which allowed for the installation of two wells proposed on the Willow Run Airport property.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- |   |      |
|---|------|
| • Current Conditions Report<br>CRA submitted Draft Report to the USEPA - October 2011<br>Approved by USEPA during a conference call - November 21, 2011 | 100% |
| • Performance-Based Administrative Order on Consent<br>Effective September 29, 2011   | 100% |
| • Site Characterization SAP & QAPP<br>Submitted by CRA to USEPA on February 17, 2012<br>Approved by the USEPA on June 4, 2012                           | 100% |

- Consultant Selection 100%  
Distributed Request for Proposal to several Consultants on February 24, 2012 and proposals were received on March 15, 2012. Signed Agreement for Environmental Consulting with MSG on June 19, 2012
- Clearing and Grubbing for Site Characterization Activities (Phase Ia) 100%  
Completed from July 5 through July 16, 2012 and from July 23 through July 27, 2012
- Site Characterization Fieldwork (Phase Ia) From July 5 through September 25, 2012 100%
- Site Characterization Data Report (Phase Ia), including proposed Phase Ib Sampling Matrix 100%  
Final version addressing USEPA comments (February 7, 2013) submitted on February 19, 2013  
Proposed Phase Ib Sampling Matrix approved by USEPA on February 7, 2013
- Clearing and Grubbing for Site Characterization Activities (Phase Ib) 100%  
Completed March 25, 2013
- Site Characterization Fieldwork (Phase Ib) 100%  
Completed from March 25, 2013 to April 4, 2013
- Human Health EI (CA725) Report (submitted June 28, 2013) 100%
- Site Characterization Phase Ib Data Report 100%  
Including proposed delineation investigation phase II (submitted October 7, 2013)  
Phase II Site Investigation scope approved by USEPA on November 22, 2013 via e-mail
- Phase II Site Investigation Field Work 100%  
Completed from December 3 through December 23, 2013
- Phase II Site Investigation Report 100%  
Including proposed Phase III delineation of off-site groundwater impacts and benzene impacts (submitted March 12, 2014)  
Phase III Site Investigation scope approved by USEPA on March 18, 2014 via e-mail
- Phase III Site Investigation Field Work 100%  
Completed from April 1 through April 30, 2014
- Phase III Site Investigation Report 100%  
Including proposed delineation investigation Phase IV (submitted September 4, 2014)
- Phase IV Site Investigation Field Work 100%  
Completed from May 21, 2015 through March 10, 2016
- Phase IV Site Investigation Report (excluding Willow Run Airport property monitoring well activities) 100%  
Submitted on July 23, 2015. Report specific to GM property submitted on September 2, 2015
- Ecological Risk Assessment, steps 1 to 4 (submitted September 8, 2014) 100%
- Ecological Risk Assessment (Anchor QEA, with MSG support), steps 5 to 8 100%  
Draft submitted June 18, 2015

- RFI Summary Report 100%  
Included as part of Draft CMS submitted October 2, 2015
- Contaminated Groundwater Migration under Control EI (CA750) 100%  
Draft submitted June 30, 2015
- Corrective Measures Proposal 100%  
Draft submitted October 2, 2015

#### SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Redevelop ground water monitoring wells on GM property – April 2016
- Perform semi-annual groundwater sampling and analysis for all permanent monitoring wells – April 2016
- Initiate Surface Debris Cleanup Activities – TBD
- Prepare summaries of meetings, data reviews, or conference calls with USEPA and respond to any comments on submittals received from USEPA - as appropriate
- Prepare the Semi-Annual Progress Report for April 1, 2015 through September 30, 2015 - October 2015