



April 14, 2023

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 1, 2022 through March 30, 2023)
RCRA Corrective Action Performance-Based Voluntary Agreement
Van Buren Industrial Land West, Van Buren Township, 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 TRUST), please find the attached progress report for October 1, 2022 through March 30, 2023. The Mannik & Smith Group, Inc. is submitting the attached progress report on behalf of RACER Trust.

If you have any questions, please reach out to David Favero or me.

Sincerely,

A handwritten signature in blue ink, appearing to read "T.E. Peters".

Thomas E. Peters, CPG, CHMM
Senior Project Manager/Corporate EH&S

Attachment A – Semi-Annual Progress Report (October 1, 2022 through March 30, 2023)

cc: David Favero, RACER TRUST



TECHNICAL SKILL.
CREATIVE SPIRIT.

ATTACHMENT A
SEMI-ANNUAL PROGRESS REPORT
PERFORMANCE-BASED VOLUNTARY AGREEMENT
VAN BUREN INDUSTRIAL LAND WEST, VAN BUREN TOWNSHIP, MICHIGAN
October 1, 2022 through March 30, 2023

WORK PERFORMED THIS PERIOD

- Conducted semi-annual ground water monitoring of selected monitoring wells during October 2022.
- Prepared the Van Buren Industrial Land West and GM property-specific Groundwater Monitoring Reports associated with the October 2022 sampling and submitted those in March 2023 in accordance with the Corrective Measures Implementation Plan (CMIP) approved by USEPA.
- Prepared the 2023 Annual Environmental Action Budget Request.
- Submitted the Corrective Measures Implementation Plan in May 2022 pursuant to USEPA's Final Decision and Response to Comments, Remedy for Soil and Groundwater Contamination for RACER Van Buren Landfill, Intersection of Ecorse Road and Route 12, Van Buren Township, Michigan, March 2022 (USEPA Final Decision). Received USEPA approval via email in May 2022.
- Prepared a Request for Proposal (RFP) to initiate corrective actions and received bids from contractors.
- Initiated discussions with Van Buren Township elected officials to begin process of establishing a groundwater use restriction zone and submitted a draft ordinance to the Township and USEPA for review via email on February 8, 2023.
- Participated in an online meeting with USEPA on January 31, 2023 to discuss delaying implementation of Site cover and debris removal as a grant was being pursued for site development that could accomplish the same objectives and future redevelopment would also likely accomplish the desired objective.
- Technical action items: data reviews and progress reporting – ongoing.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

For the October 2022 sampling event, MW-1 and MW-24 were not sampled due to obstructions within the wells preventing the bladder pump to be properly placed for purging and sampling. Subsequent to the sampling event, a new ground water monitoring well was installed adjacent to monitoring well MW-1 (MW-1R) and monitoring well MW-1 was properly abandoned. Monitoring well MW-1R will be incorporated into the Semi-Annual Ground Water Sampling regimen. Additionally, monitoring well MW-24 was properly abandoned. The monitoring well replacement and abandonment activities were approved by USEPA via the CMIP.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

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

Submitted by CRA to USEPA on February 17, 2012
Approved by the USEPA on June 4, 2012

- 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
- Draft Baseline Ecological Risk Assessment, steps 1 to 4 (submitted September 8, 2014) 100%
Comments received from USEPA on June 3, 2016

- Draft Baseline Ecological Risk Assessment (Anchor QEA, with MSG support), steps 5 to 8
Draft submitted June 18, 2015 100%
- 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 Study 100%
Draft submitted October 2, 2015
- Draft Baseline Ecological Risk Assessment (Anchor QEA, with MSG support), Steps 1 to 2 100%
Report submitted to USEPA on August 5, 2016
- Draft Ecological Risk Assessment (Anchor QEA, with MSG support), Steps 5 to 8 100%
Received acceptance letter from USEPA dated September 14, 2016
Updated report submitted to USEPA on July 7, 2017
Received acceptance email from USEPA dated September 21, 2017
- Ecological Risk Mitigation Evaluation- MEMO drafted, February 8, 2018 100%
- Corrective Measures Study (CMS) 100%
Updated draft submitted September 6, 2018
- CMS Addendum regarding Targeted Pump and Treat Alternative. Draft submitted May 20, 2019 100%
- Notice of Migration of Contamination, Distributed in December 2019 100%
- Statement of Basis for Proposed Soil and Groundwater Cleanup at RACER Van Buren Township Landfill, Ecorse Road and Route 12, Van Buren Township, Michigan, issued by USEPA on September 2, 2021. 100%
- Comments on U.S. EPA's Statement of Basis for Soil and Groundwater Cleanup at RACER Van Buren Township Landfill submitted by RACER on September 30, 2021. 100%
- Final Decision and Response to Comments, Remedy for Soil and Groundwater Contamination for RACER Van Buren Landfill, Intersection of Ecorse Road and Route 12, Van Buren Township, Michigan, issued by USPEA in March 2022. 100%
- Corrective Measures Implementation Plan – approved by USEPA in May 2022 100%
- Submitted the updated Quality Assurance Project Plan (QAPP) to USEPA in September 2022 Pending
- Corrective Measures Implementation
 - Groundwater Monitoring In progress
 - Groundwater Use Restriction Ordinance 20%
Submitted draft ordinance to Township and USEPA on February 8, 2023
 - Ecological Cover and Debris Removal 10%
Prepared and distributed RFP, and received bids.

Requested USEPA approve delaying activity as a grant to develop the site and/or redevelopment of the Site would accomplish the same objectives.

- Declaration of Restrictive Covenant (DRC) 0%
The intent in the CMIP was to prepare and record a DRC after cover and debris removal so cover area could be surveyed and identified in the DRC. Given that activity is being delayed, a DRC for the site needs to be prepared.

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Perform semi-annual groundwater monitoring in accordance with the Corrective Measures Implementation Plan (CMIP) approved by USEPA and prepare necessary reports.
- Upon USEPA input, complete and submit Final Quality Assurance Project Plan (QAPP)
- Upon Township and USEPA input follow-up on the groundwater use restriction ordinance
- Initiate preparation of a DRC
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, and respond to any comments on submittals received from USEPA.
- Prepare the Semi-Annual Progress Report for April 1, 2023 – September 30, 2023.