



October 13, 2023

Transmitted via E-mail

Mr. Greg Rudloff
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 (April 1, 2023 through September 30, 2023)
RCRA Corrective Action Performance-Based Voluntary Agreement
Van Buren Industrial Land West, Van Buren Township, Michigan**

Dear Greg:

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 April 1, 2023 through September 30, 2023. The Mannik & Smith Group, Inc.(MSG) is submitting the attached progress report on behalf of RACER Trust.

During this reporting period the MSG Project Manager Tom Peters retired and his Project Management tasks were transitioned to Mr. Kevin Lund.

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

Sincerely,

A handwritten signature in black ink that reads "Kevin D. Lund".

Kevin Lund, PE, CPG
Senior Project Manager

Attachment A – Semi-Annual Progress Report (April 1, 2023 through September 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
April 1, 2023 through September 30, 2023

WORK PERFORMED THIS PERIOD

- Conducted semi-annual ground water monitoring of selected monitoring wells during April 14 through May 5, 2023.
- Verbally discussed with USEPA delaying implementation of the soil cover to address the potential ecological risk at the Site in order to allow for time for potentially obtaining a grant for prepping the Site for redevelopment and for potential for sale of the Site for industrial development. Both of these possibilities would eliminate the need for soil cover to address potential ecological risk at the Site.
- Notified Subaru, General Motors, LLC, Norfolk Southern Railway, Willow Run Airport, Michigan Department of Transportation, Detroit Metro Water Department, and select occupants of the Town & Country Mobile Home park in May 2023 of the proposed groundwater use restriction ordinance.
- GM submitted a comment letter to RACER and the Township in May 2023 identifying concerns and opposition to the proposed groundwater use restriction ordinance.
- Held a public information session in relation to the proposed groundwater use restriction ordinance at Van Buren Charter Township Hall in June 2023. Other than Township or RACER representatives only a local reporter attended the session.
- Communicated with GM several times with respect to the concerns contained in its comment letter on the proposed groundwater use restriction ordinance.
- Prepared the Van Buren Industrial Land West and GM property-specific Groundwater Monitoring Reports associated with the May 2023 groundwater sampling and submitted those in June 2023 in accordance with the Corrective Measures Implementation Plan (CMIP) approved by USEPA.
- Technical action items: data reviews and progress reporting – ongoing.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

GM submitted a comment letter to RACER and the Township in May 2023 identifying concerns and opposition to the proposed groundwater use restriction ordinance.

Inadvertently, five (5) monitoring wells were not gauged (MW-13, MW-14, MW-15, MW-16, and MW-28) in the May sampling event to assess the groundwater piezometric level. While these measurements were not collected, it is believed there is still good representation of groundwater elevations at the Site due to the distribution of and data from the other wells. Given the amount of historical groundwater piezometric level data that is available, the absence of the piezometric levels from the five (5) wells does not alter the overall understanding of the groundwater flow direction on Site.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- Current Conditions Report 100%
CRA submitted Draft Report to the USEPA - October 2011
Approved by USEPA during a conference call - November 21, 2011
- Performance-Based Administrative Order on Consent 100%
Effective September 29, 2011
- 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 8 100%
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 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%
- Updated Quality Assurance Project Plan (QAPP)
 - Submitted to USEPA in September 2022 100%
 - Revised QAPP submitted to USEPA in February 2023 100%
- Corrective Measures Implementation
 - Groundwater Monitoring In progress
 - Groundwater Use Restriction Ordinance 80%
Submitted draft ordinance to Township and USEPA on February 8, 2023
 - Ecological Cover and Debris Removal on hold
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. Respond to any USEPA comments on the QAPP.
- Continue to work with GM to address its concerns with the proposed groundwater use restriction ordinance and then provide revised proposed ordinance to USEPA and the Township for review.
- 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 a draft 2024 annual environmental action budget request for USEPA review and approval.
- Evaluate the Site remediation priorities, budget requirements, and funding, and factor into overall RACER funding prioritization process.
- Prepare the Semi-Annual Progress Report for October 1, 2024 – March 31, 2024.