

Transmitted via E-mail

July 15, 2019

Mr. Brandon Pursel (pursel.brandon@epa.gov)  
U.S. Environmental Protection Agency, Region 5  
Land, Chemicals, and Redevelopment Division  
77 West Jackson Blvd., LU-16J  
Chicago, IL 60604-3590

RE: First Half 2019 Progress Report  
Performance-Based Administrative Order on Consent  
RCRA Corrective Action  
Flint West Facility #12990  
Flint, Michigan  
USEPA ID No. MIK204011722<sup>A</sup>

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Dear Mr. Pursel:

In accordance with paragraph 24.b. of the Performance-Based Administrative Order on Consent, Docket No. 05-2011-0021 (AOC), 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 the first half of 2019 (January 1, 2019 through June 30, 2019).

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

Sincerely,



Michael Smith  
Technical Services Manager

A - Note that this facility is identified as USEPA ID No. MID005356654 in the Administrative Order on Consent for this facility. However, the correct USEPA ID No. is MIK204011722.

Attachment A - First half 2019 Progress Report

C: David Favero, RACER

ATTACHMENT A  
FIRST HALF 2019 PROGRESS REPORT  
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT  
FLINT WEST FACILITY - #12990, FLINT, MICHIGAN  
January 1, 2019 to June 30, 2019

WORK PERFORMED THIS PERIOD

- Prepared the Second Half 2018 Progress Report and submitted it to USEPA on January 11, 2019.
- Gauged all monitoring wells for depth to water on January 17, 2019. Prepared a Groundwater Contour Map, using the January 17, 2019 groundwater elevation data. Prepared cross section diagrams (based on drilling conducted through 2018), showing soil types, groundwater elevations, and soil and groundwater data.
- Conducted a routine groundwater monitoring event on February 27 and 28, 2019.
- Installed four Geoprobe soil borings (SB-138, SB-139, SB-140, and SB-141) in the vicinity of soil borings which previously showed significant chlorinated impact (SB-123/SB-131/SB-132, and SB-122/SB-133) on January 16, 2019 (within the HRC pilot test injection area.) Collected and analyzed a total of nine soil samples from the borings at intervals that revealed the highest concentrations of volatile organic compounds (VOCs) in soil during previous investigations.
- Collected groundwater samples from monitoring wells MW-103S, MW-109S, MW-111S, MW-112S, MW-113S, and MW-114S on January 17, 2019 as part of follow-up monitoring for the HRC pilot test.
- Prepared and submitted a Data Report summarizing the January and February sampling to USEPA on April 9, 2019.

DATA COLLECTED THIS PERIOD

Groundwater Monitoring

- Groundwater samples collected from monitoring wells on February 27 and 28, 2019 were analyzed for the following: VOCs, metals (total and dissolved) including arsenic, chromium (total and hexavalent), copper, lead, selenium, zinc, and lead.

HRC Pilot Test Follow-Up

- Four Geoprobe soil borings (SB-138, SB-139, SB-140, and SB-141) were installed in the vicinity of soil borings which previously showed significant chlorinated impact (SB-123/SB-131/SB-132, and SB-122/SB-133) on January 16, 2019 (within the HRC pilot test injection area.) Nine soil samples were collected from the borings at intervals that revealed the highest concentrations of VOCs in soil during previous investigations.

- Groundwater samples collected from MW-109S, MW-111S, MW-112S, MW-113S, and MW-114S on January 17, 2019 were analyzed for the following: VOCs, total organic carbon, metals (total and dissolved) including arsenic, chromium (total and hexavalent), manganese, copper, lead, selenium, zinc, iron and lead, and methane. Measured oxidation reduction potential, pH, dissolved oxygen, turbidity and conductivity with a meter in the field during sampling. The groundwater sample collected from MW-103S was analyzed for PFAS.

#### PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

- No problems were encountered.

#### ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- RFI Phase II Sampling Matrix Preparation and Fieldwork Implementation (Proposed 2012 activities) 100%  

The 2012 portions of the proposed Phase II investigation included in the June 26, 2012, Phase I Data Report were completed and included the completion and sampling of 13 soil borings, eight of which were finished as monitoring wells. Soil and groundwater samples (from the 8 new and 5 previously-installed monitoring wells) were collected and were analyzed for ten MDEQ Metals including Chromium VI, VOCs (USEPA 8260), and PNAs (USEPA 8310).
- RFI Phase II Data Report Preparation 100%  
(Submitted February 12, 2013)
- Human Health EI (CA725) Report 100%  
(Submitted July 1, 2013)
- Data Report Preparation 100%  
(Additional investigations and groundwater monitoring)  
(Submitted July 9, 2013)
- Data Report Preparation 100%  
(Additional well installation and groundwater monitoring)  
(Submitted October 12, 2013)
- Groundwater Migration under Control EI (CA750) 100%  
(Submitted March 1, 2014)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted March 18, 2014)
- Data Report Preparation 100%

(April, 2014 additional investigations and groundwater monitoring)  
(Submitted June 23, 2014)

- Data Report Preparation 100%  
(June, 2014 groundwater monitoring and July 2014 additional soil investigations)  
(Submitted October 3, 2014)
- Draft Corrective Measures Proposal 100%  
(Submitted November 1, 2014)
- Data Report Preparation 100%  
(December, 2014 additional soil investigation and groundwater monitoring)  
(Submitted February 13, 2015)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted August 12, 2015)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted February 23, 2016)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted August 3, 2016)
- Draft Work Plan for Hydrogen Release Compound (HRC) 100%  
Pilot Test Preparation  
(Submitted October 7, 2016, addendum submitted to USEPA  
and MDEQ July 12, 2017)
- Data Report Preparation 100%  
(Groundwater monitoring - October and November, 2016)  
(Submitted February 21, 2017)
- Data Report Preparation 100%  
(Groundwater monitoring – June 2017)  
(Submitted August 11, 2017)
- Data Report Preparation 100%  
(Groundwater monitoring – January 2018)  
(Submitted April 11, 2018)
- Data Report Preparation 100%  
(Groundwater monitoring. HRC Pilot Study – May through July 2018)  
(Submitted July 27, 2018)
- Data Report Preparation 100%

(Groundwater Sampling for HRC Pilot Study and routine groundwater monitoring – August to September 2018)  
(Submitted October 16, 2018)

- Data Report Preparation 100%  
(October 16/17, 2018 post-HRC injection groundwater sampling)  
(Submitted December 12, 2018)
- Data Report Preparation 100%  
(January and February sampling)  
(Submitted April 9, 2019)

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

- Complete groundwater monitoring (routine monitoring event and HRC injection follow-up) in July, 2019.
- Prepare a Data Report summarizing the results of the July, 2019 groundwater sampling in August, 2019. Results will be evaluated to determine potential revisions to the full-scale HRC injection.
- Review, discuss and respond to any USEPA or Michigan Department of Environment, Great Lakes, and Energy (EGLE) comments on Data Reports and other submittals.
- A Corrective Measures Implementation (CMI) Work Plan will be submitted within 90 days of approval of the selected corrective measures alternative. The CMI Work Plan will include a draft Declaration of Restrictive Covenant, details for the full-scale HRC injection, details for groundwater monitoring, and an implementation schedule. (Depending on completion of the HRC Pilot Test and the timing of and comments from USEPA's review of the CMP).
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, and Data Report(s), as appropriate.