



**CONESTOGA-ROVERS
& ASSOCIATES**

14496 Sheldon Road, Suite 200, Plymouth, MI 48170
Telephone: (734) 453-5123 Fax: (734) 453-5201
www.CRAworld.com

July 14, 2014

Reference No. 017322

Mr. Peter Ramanauskas
U.S. Environmental Protection Agency, Region 5
Land and Chemicals Division
77 West Jackson Blvd., LU-9J
Chicago, Illinois 60604-3590

Dear Mr. Ramanauskas:

Re: First Half 2014 Progress Report
Performance-Based Administrative Order on Consent
PCC-Validation, Pontiac, Michigan
USEPA ID#: MID980568836

In accordance with the Administrative Order on Consent (AOC) between the U.S. Environmental Protection Agency (USEPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find attached the progress report for the First Half of 2014 (January 1, 2014 through June 30, 2014).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas M. Kinney, C.P.G.

TMK/MJC/ds/6/Det.

Encl: Attachment A – First Half 2014 Progress Report

cc: David Favero, RACER
Grant Trigger, RACER

Equal
Employment Opportunity
Employer

REGISTERED COMPANY FOR
ISO 9001
ENGINEERING DESIGN

ATTACHMENT A

FIRST HALF 2014 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
PCC-VALIDATION, PONTIAC, MICHIGAN

JANUARY 1, 2014 THROUGH JUNE 30, 2014

DESCRIPTION OF WORK COMPLETED

- Submitted a request to bulkhead storm sewer laterals in the LNAPL area to the USEPA on January 15, 2014 and received USEPA's approval on March 4, 2014.
- Completed a storm sewer inspection in the vicinity of the LNAPL area on April 23, 2014.
- Prepared and submitted responses to USEPA Comments related to the CA750 Environmental Indicators determination via a memorandum dated June 19, 2014.

DATA AVAILABLE DURING THIS TIME PERIOD

- None

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

- None

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- | | |
|---|------|
| • Current Conditions Report | 100% |
| • Phase III Investigation | 100% |
| Field investigations completed in August and December 2012 | |
| Monitoring well installation and a groundwater monitoring event completed in 2013 | |
| • CA 725 Environmental Indicator - Human Health | 100% |
| Submitted to USEPA on January 25, 2013 | |
| Approved by USEPA on June 11, 2013 | |

- CA 750 Environmental Indicator – Groundwater 95%
Submitted to USEPA on March 11, 2013
Submitted an addendum to USEPA on September 4, 2013
Submitted additional information to USEPA on June 19, 2014
- Corrective Measures Proposal (CMP) 80%
Submitted to USEPA on May 7, 2013, awaiting review by USEPA
- Land Use Restriction 90%
Declaration of Restrictive Covenant currently in development
- LNAPL Recovery 100%
Further LNAPL recovery was not recommended per CA 725 and CMP
Bulkheading storm sewers planned for July 2014
- GW Monitoring 85%
Submitted a SAP and MWAP to USEPA on November 21, 2013
Comments have been received from USEPA and the
SAP and MAWAP will be modified
- Corrective Measures Complete with Controls Report 0%

PROJECTED WORK FOR NEXT REPORTING PERIOD

- Meet with USEPA to discuss project status and/or respond to any comments received from USEPA on the Addendum to/supplemental information for the CA 750 Report, the CMP or SAP/MWAP.
- Complete bulkheading of storm sewers in the area of the LNAPL and prepare and submit documentation.
- Complete well survey for the immediate area surrounding the Site.
- Complete a round of groundwater monitoring and prepare and submit a data report.
- Modify and re-submit the SAP/MWAP.
- Evaluate and report on the findings of the applicability of the MDEQ Road Right-of-Way alternate Institutional Control for the VOC groundwater impacts northwest of the Site.
- Clarify and provide documentation with respect to delineation of the VOC groundwater impacts adjacent to the LNAPL area in the southern part of the Site.
- Provide assistance to potential buyer in obtaining Prospective Purchaser Agreement with USEPA, if needed.
- Finalize Declaration of Restrictive Covenant.
