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**Remediation and Liability Management Company, Inc.**

July 12, 2004

Mr. Kevin Holdwick  
Michigan Department of Environmental Quality  
Waste Management Division  
P.O. Box 30241  
Lansing, Michigan 48909-7741

Dear Mr. Holdwick:

Re: Quarterly Progress Report - Second Quarter 2004  
Former Peregrine (US) Inc. Coldwater Road Facility, Genesee Township, Michigan  
U.S. EPA ID No. MIR000020743

This letter presents a summary of the work conducted on the RCRA Facility Investigation (RFI) for the Former Peregrine (US) Inc. Coldwater Road Facility during the period of April 1, 2004 to June 30, 2004. The work scheduled during the next quarterly period is also summarized. The Quarterly Progress Report is presented in Attachment A.

Please feel free to contact me at (248) 753-5799 if you have any questions regarding this Quarterly Progress Report or if you require any further information.

Yours truly,

REMEDICATION AND LIABILITY MANAGEMENT COMPANY, INC.

*Cheryl Hiatt*  
for Cheryl Hiatt  
Project Manager

SE/pw/12636/23  
Encl.

c.c.: MDEQ-WMD (4 additional copies)  
Marilyn Dedyne (REALM)  
Jean Caufield (REALM)  
Glenn Turchan (CRA)

FILE COPY

**ATTACHMENT A**

**QUARTERLY PROGRESS REPORT  
APRIL 1, 2004 - JUNE 30, 2004**

**DESCRIPTION OF WORK COMPLETED**

The following activities were completed:

- Cleaning and/or removal of small sections of the concrete floor slab where oil staining occurs;
- Removal of soils underlying the floor slab where appropriate;
- Spot excavation of soil in areas that exceed either direct contact or air inhalation generic criteria;
- Backfilling the excavations with silty clay material;
- Restoration of the surface by placement of stone or seeding with prairie grass;
- Location and/or abandonment of monitoring wells installed by Peregrine (US) Inc. that are no longer visually located at the surface;
- Submittal of "Monitoring Well Abandonment Report" to MDEQ on May 28, 2004; and
- Submittal of "Response to MDEQ Letter Dated May 11, 2004 Regarding April 23, 2004 Inspection" to MDEQ on June 9, 2004.

**SUMMARY OF ALL FINDINGS**

- Findings are presented in RFI Report (CRA, November 2000), Groundwater Not In An Aquifer Evaluation (CRA, April 24, 2003), RFI Second Round Groundwater Sampling (REALM, April 24, 2003), and Delineation Soil Sample Results (REALM, September 10, 2003);
- Additional findings will be presented in letter(s) and report(s) as they become available; and
- The RFI Report will be revised to incorporate new findings.

**SUMMARY OF ALL CHANGES MADE IN THE RFI**

- Changes made to RFI are presented in RFI Report (CRA, November 2000) and Response to Comments on RFI Report (CRA, March 2002).

**SUMMARY OF ALL CONTACTS MADE WITH LOCAL OR STATE REPRESENTATIVES AND INTERESTED GROUPS**

- Consumers Energy visited the Facility on April 1, 2004 in response to a complaint about odor. Air monitoring did not indicate any unacceptable levels of fugitive dust, natural gas, or other constituents. However, the open excavation from which the odor was emanating was covered with visqueen and temporarily backfilled. Excavation in this area was resumed when the wind direction changed;

- MDEQ visited the Facility on April 23, 2004 to observe excavation of the former Drum Storage Area. William Yocum sent a letter to Cheryl Hiatt on May 11, 2004 regarding alleged violations observed during the April 23, 2004 inspection;
- Submittal of "Monitoring Well Abandonment Report" to MDEQ on May 28, 2004, in response to MDEQ's March 1, 2004 letter requiring the location and abandonment of on-Site wells; and
- Submittal of "Response to MDEQ Letter Dated May 11, 2004 Regarding April 23, 2004 Inspection" to MDEQ on June 9, 2004, in response to MDEQ's May 11, 2004 letter alleging violations related to disposal of soil from the former Drum Storage Area as non-hazardous solid waste at the Brent Run Landfill.

#### ANTICIPATED OR POTENTIAL PROBLEMS

- None.

#### ACTIONS TAKEN TO RECTIFY PROBLEMS

- Not applicable.

#### CHANGES IN PERSONNEL

- None.

#### PROJECTED WORK FOR THE NEXT REPORTING PERIOD

The following work is expected to be conducted during the July 1, 2004 to September 30, 2004 period:

- Restoration of the areas disturbed by excavation to locate monitoring wells by seeding with prairie grass; and
- Submittal of No Exposure Certification for exclusion from NPDES permit.

#### COPIES OF DAILY REPORTS, INSPECTION REPORTS, AND LABORATORY DATA

- Presented in RFI Report (CRA, November 2000), Groundwater Not In An Aquifer Evaluation (CRA, April 24, 2003), RFI Second Round Groundwater Sampling (CRA, April 24, 2003) and Delineation of Soil Sample results (CRA, September 10, 2003);
- Additional data will be presented in letter(s) and report(s) as they become available; and
- Additional details available upon request.