



**CONESTOGA-ROVERS
& ASSOCIATES**

14496 Sheldon Road, Suite 200, Plymouth, Michigan 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

January 13, 2012

Reference No. 017322
Submitted via email (.pdf)

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: Second Half 2011 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 second half of 2011 (July 1, 2011 through December 31, 2011).

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

Sincerely,

Thomas M. Kinney, C.P.G.

TMK/MJC/1/Det.

Attachment A - Second Half 2011 Progress Report

cc: David Favero, RACER
Grant Trigger, RACER

ATTACHMENT A

SECOND HALF 2011 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
PCC-VALIDATION, PONTIAC, MICHIGAN

JULY 1, 2011 TO DECEMBER 31, 2011

DESCRIPTION OF WORK COMPLETED

- Prepared and submitted Current Conditions Report (CCR) on August 31, 2011
- Met on September 28, 2011 to discuss project status, and approach and scope of work anticipated for 2012
- Negotiated the AOC with an effective date of September 29, 2011
- Developed a draft 2012 Annual Environmental Action (EA) Budget Request for 2012 that was submitted to USEPA on October 28, 2011
- Performed groundwater elevation and LNAPL thickness measurement activities on December 5, 2011
- Performed LNAPL recovery activities at MW69-08 on December 5, 2011
- Submitted a Supplement to the CCR on December 12, 2011, in response to comments received from USEPA
- Prepared and submitted the final 2012 Annual EA Budget Request on December 14, 2011, which was approved by USEPA on December 28, 2011

DATA AVAILABLE DURING THIS TIME PERIOD

- A summary of the volume of LNAPL bailed from monitoring well MW69-08 and the initial and final depths to water and free product from each monitoring event is provided in Table 1.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

- None

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- Current Conditions Report 100%
The draft CCR was submitted to the USEPA on August 30, 2011.

Based on USPA response to the draft CCR, a Supplement to the CCR was submitted to the USEPA on December 12, 2011.

- | | |
|--|-----|
| • Phase III Investigation | 15% |
| • LNAPL Recovery | 10% |
| Ongoing LNAPL recovery actives were completed to address AOI 28. | |
| • GW Monitoring | 0% |
| • Closure Report | 0% |
| • Land Use Restriction | 0% |

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Attached is a MS Project Gantt chart depicting the schedule for 2012
- Prepare and submit a Phase III Work Plan and implement the field work
- Continue LNAPL Recovery

TABLE 1
QUARTERLY LNAPL MONITORING
MONITORING WELL MW69-08
PONTIAC VALIDATION CENTER
PONTIAC, MICHIGAN

<i>Date of Monitoring</i> ⁽¹⁾	<i>Volume LNAPL Removed</i> ⁽²⁾ (gal)	<i>Initial Depth to LNAPL</i> (ft BTOR)	<i>Initial Depth to Water</i> (ft BTOR)	<i>Initial In-Well LNAPL Thickness</i> (ft)	<i>Final Depth to LNAPL</i> (ft BTOR)	<i>Final Depth to Water</i> (ft BTOR)	<i>Final In-Well LNAPL Thickness</i> (ft)
April 3, 2008	2.50	12.10	16.44	4.34	14.50	14.80	0.30
July 3, 2008	2.75	9.43	16.39	6.96	12.73	12.98	0.25
December 12, 2008	1.50	10.92	13.58	2.66	12.81	13.02	0.21
December 15, 2008	0.50	11.21	12.46	1.25	12.30	12.55	0.25
January 28, 2009	0.50	11.04	11.92	0.88	11.86	11.96	0.10
April 14, 2009	0.75	8.27	9.62	1.35	9.99	10.05	0.06
July 17, 2009	0.01	9.02	9.24	0.22	9.99	10.01	0.02
October 15, 2009	0.01	9.41	9.57	0.16	10.41	10.42	0.01
March 18, 2010	0.01	10.92	11.20	0.28	11.51	11.54	0.03
June 10, 2010	0.01	7.81	8.10	0.29	8.68	8.72	0.04
September 17, 2010	0.01	11.50	11.78	0.28	11.98	12.01	0.03
December 21, 2010	0.01	11.38	11.65	0.27	11.87	11.89	0.02
March 7, 2011	0.01	11.27	11.39	0.12	11.75	11.77	0.02
June 23, 2011	0.01	7.83	7.98	0.15	8.55	8.57	0.02
December 5, 2011	0.01	7.47	7.58	0.11	8.26	8.27	0.01
Total:	8.59						

Notes:

LNAPL: Light Non-Aqueous Phase Liquid.

ft: Feet.

BTOR: Below Top of Riser.

Gal: Gallons.

N/A: Not Available.

(1) : LNAPL was detected in monitoring well MW69-08 in March 2008 during a Phase II Environmental Site Assessment conducted by CRA. The extent of the LNAPL was delineated in April 2008 via laser-induced fluorescence.

(2) : Volume removed is approximate. LNAPL removed with a bailer and stored on-Site in a grounded drum with an overpack.

