



**CONESTOGA-ROVERS
& ASSOCIATES**

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July 13, 2012

Reference No. 012607

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

Dear Mr. Rudloff:

RE: 1st Semi-Annual 2012 Progress Report
Performance-Based Administrative Order on Consent
Docket Number RCRA-05-2011-0025
13000 Eckles Road Site, Livonia, Michigan
USEPA ID No. MID 005 356 621

In accordance with the Performance-Based Administrative Order on Consent between the U.S. Environmental Protection Agency Region 5 (USEPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for the first half of 2012 (January, 2012 through June 30, 2012).

Please contact Grant Trigger or Jeff Crum (regarding soil vapor related matters), or me (regarding system operation matters) if you would like to discuss this matter further. Thank you.

Yours truly,

Christopher J. Meincke, P.E.

CJM/KTA/ds/9/Det.
Attachment A: 1st Semi-Annual 2012 Progress Report

cc: Grant Trigger, RACER
Dave Favero, RACER
Richard Conforti, MDEQ
Livonia Civic Center Library

ATTACHMENT A

**1st SEMI-ANNUAL 2012 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
13000 ECKLES ROAD SITE, LIVONIA, MICHIGAN
JANUARY 1, 2012 TO JUNE 30, 2012**

DESCRIPTION OF WORK COMPLETED

- Continued operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system
- Submitted a 2nd Semi-Annual 2011 Annual Progress Report dated January 13, 2012 to USEPA
- Submitted revised Standard Operating Procedures (SOPs) to USEPA for Vapor Intrusion sampling of sub-slab and near-slab soil gas, indoor and outdoor air, and sump water. USEPA approved SOPs February 2012
- Submitted revised SOPs to USEPA for installation and performance monitoring of vapor intrusion mitigation systems. USEPA approved SOPs February 2012
- Submitted a work plan for the evaluation of vapor intrusion pathway exposures for off-site residences to USEPA on January 27, 2012
- Submitted a memo to USEPA on January 27 proposing a new monitoring well on a property south of Grantland Avenue and an additional round of groundwater sample collection and analysis to further delineate off-site impacted groundwater
- Submitted the 2012 EA Budget Amendment Request No. 1 to USEPA on January 30, 2012 to develop, perform and report the results of a Vapor Intrusion Investigation and Mitigation Plan
- USEPA approved the 2012 Budget Amendment Request No. 1 on February 1, 2012
- Participated in conference calls with Michigan Department of Community Health (MDCH), Michigan Department of Environmental Quality (MDEQ) and/or USEPA to develop and facilitate presentation of vapor intrusion sample results to residents on the following dates: January 11 and 19, 2012; February 7, 8, 9 and 14, 2012; March 6, 2012; April 5, 10 and 26, 2012; May 9, 2012 (Project Review Meeting with USEPA)
- Performed groundwater elevation and LNAPL thickness measurement activities at AOI 21 monitoring wells on March 20 and June 7, 2012
- Implemented the first round of field investigation activities to evaluate the Vapor Intrusion Pathway at off-site properties southeast of the Site in February/March 2012. Presented and interpreted vapor intrusion sample results to residents at their homes. Provided sample results, field sheets and figures to USEPA to facilitate decisions for second sampling event
- Implemented the 2nd round of field investigation activities to evaluate the Vapor Intrusion Pathway at off-site properties southeast of the Site in April 2012. Presented and interpreted vapor intrusion sample results to residents at their homes. Provided sample results and figures to USEPA and collaborated to address unexpected detections of non-plume related compounds – confirmation sampling

- Implemented a 3rd round of select confirmatory field investigation activities to evaluate the Vapor Intrusion Pathway at off-site properties southeast of the Site in May 2012. Presented and interpreted vapor intrusion sample results to residents at their homes. Provided sample results to USEPA and discussed additional confirmation sampling
- Implemented a 4th round of select confirmatory field investigation activities to evaluate the Vapor Intrusion Pathway at off-site properties southeast of the Site in May 2012. Presented and interpreted vapor intrusion sample results to residents at their homes. Provided sample results to USEPA, discussed and developed third-party sampling strategy in collaboration with EPA, MDCH, and MDEQ
- Submitted a *Property-Specific Mitigation Work Plan, House #7, Livonia Michigan*, dated May 8, 2012 to USEPA; which contained the design and performance monitoring plans for the vapor mitigation system to be installed in one residence in July 2012
- Completed groundwater collection activities from on-site and off-site monitoring wells at AOI 31 April 16th, 17th, 18th, 19th, and 25th, 2012 to support the Vapor Intrusion Pathway evaluation
- Participated in a meeting with USEPA on May 9, 2012 to review and discuss the Vapor Intrusion Pathway evaluation

DATA COLLECTED

- Soil gas, indoor air and ambient/outdoor air analytical results and reports provided by Fibertec for the Vapor Intrusion Investigation. Interpretation of sample data to be provided to USEPA in separate report
- Vapor mitigation diagnostic measurements collected at one residence to develop the mitigation system design. Results were provided to USEPA in a Draft Property-Specific Mitigation Work Plan dated May 1, 2012
- Groundwater elevation and LNAPL thickness measurements from AOI 21 monitoring wells (to be provided in a separate report)
- Analytical results of groundwater samples collected from AOI 31 monitoring wells in April 2012 (to be provided in a separate report)

PROBLEMS ENCOUNTERED

- Anomalous detection of trans-1,2-Dichloroethylene at two homes during the second round of the vapor intrusion investigation; Problem is resolved via confirmation sampling at one home, and currently in the process of being resolved at the second home via third-party sampling, despite negative results obtained from two confirmation sampling events

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- O&M of the Groundwater Pump & Treat System (GWTP, Barrier Wall, Cover) 7%
Continued operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system. Submitted appropriate discharge reports as per the Special Discharge Permit. (Percent complete estimated as 2 years complete of 27 years estimated in the May 2010 RCES.)
- Long-Term Groundwater Monitoring 100%
Long-Term Groundwater Monitoring Plan scheduled to be complete after 5 years of continued stability/reduction in off-Site/boundary concentrations (2006 through 2010). Sampling activities are currently planned to continue pending USEPA approval to cease monitoring.
- Maintenance of the AOI 39 Dust Control Plan 100%
- Restrictive Covenants 100%
- Pilot Tests - Alternative Chemicals & Target In-Situ Treatment Injection 30%
Objective was to design, implement and evaluate a pilot test to use alternative chemicals in the wastewater treatment process that could reduce treatment system operating time and/or operating costs. Also, design and implement an in-situ stabilization treatment in Area 1 that could also reduce treatment system operating time and long-term monitoring duration. The Area 1 field pilot test was conducted in November and December 2010. Based on an evaluation of the pilot test results, additional pilot study injection and monitoring activities were recommended to determine if full-scale on-site implementation would significantly reduce dissolved concentrations of chromium and nickel and allow for the groundwater treatment plant activities to be reduced or eliminated. The groundwater treatment plant optimization activities have not been conducted due to health and safety concerns associated with handling, storing, and mixing the proposed replacement chemicals.
- Groundwater Treatment System Decommissioning & Removal 0%
Anticipated to be completed in 2037.
- Completion Report & Well Abandonment 0%
Anticipated to be completed in 2037.
- Vapor Intrusion Evaluation 75%
Anticipated completion December 2012, pending USEPA review of sample results summary report

SUMMARY OF CONTACTS WITH INTERESTED PARTIES

- None

CHANGES IN PERSONNEL

- None

**PROJECTED WORK FOR NEXT REPORTING PERIOD
(JULY 2012 THROUGH DECEMBER 2012)**

- Prepare and submit the results of the Vapor Intrusion Pathway Evaluation in a summary report to USEPA
- Install one vapor mitigation system July 16, 2012, and conduct follow-up performance monitoring 30, 60 and 180 days post installation, and submit a summary of the performance results and any system modifications if needed to USEPA
- Continued operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system
- Complete quarterly groundwater elevation and LNAPL thickness measurements from AOI 21 monitoring wells
- Perform groundwater sampling activities in accordance with the revised Groundwater Monitoring Plan
- Perform evaluation of Area 1 French Drain Collection Trench and Groundwater Treatment system
- Conduct meetings/information sessions with off-Site property owners related to AOI 31 groundwater as appropriate
- Prepare final report to USEPA of Vapor Intrusion Investigation results, Vapor Mitigation installation, and recommendations
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, as appropriate
- Prepare the 2nd 2012 Semi-Annual Progress Report