



July 14, 2015

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: First Half 2015 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 2015 (January 1, 2015 through June 30, 2015).

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

Sincerely,

GHD

A handwritten signature in dark ink, appearing to read "Thomas Kinney", written in a cursive style.

Thomas M. Kinney, C.P.G.

TMK/MJC/ds/8/Det.

Encl: Attachment A – First Half 2015 Progress Report

cc: David Favero, RACER
Grant Trigger, RACER

ATTACHMENT A

FIRST HALF 2015 PROGRESS REPORT PERFORMANCE BASED ADMINISTRATIVE ORDER ON CONSENT PCC VALIDATION, PONTIAC, MICHIGAN

JANUARY 1, 2015 THROUGH JUNE 30, 2015

DESCRIPTION OF WORK COMPLETED

- Installed two monitoring wells (MW74D-15 and MW94-15), in April 2015 at the request of the USEPA to vertically and horizontally delineate the Southern dissolved VOC area impacts. The two wells were included in the 2015 annual groundwater sampling scope of work.
- Conducted two rounds of groundwater sampling during the 2015 annual groundwater monitoring activities. The first round was conducted on April 5 and April 6, 2015 and 21 of the 23 monitoring wells scheduled to be sampled were sampled. The second round of sampling was conducted on May 13, 2015 and six of the eight monitoring wells scheduled for sampling were sampled. Wells scheduled to be sampled but not sampled was due to insufficient groundwater. The sample results were submitted to USEPA on June 30, 2015 in the Draft 2015 Annual Groundwater Monitoring Report.
- Received email approval from USEPA dated March 3, 2015, for abandoning monitoring wells in anticipation of upcoming Site re development. On May 26, 2015, CRA abandoned 19 monitoring wells on behalf of RACER. On June 11 and 12, 2015, SME abandoned the remaining 21 monitoring wells on behalf of the new owner, M1 Concourse, LLC (M1).
- Coordinated with USEPA and M1 regarding PCB impacted soil.
- SME completed soil sampling in the PCB impacted soil area on June 11 and 12, 2015, on behalf of M1.
- M1 initiated redevelopment.

DATA AVAILABLE DURING THIS TIME PERIOD

- Groundwater analytical results from the annual groundwater sampling event. The data was presented to USEPA in the draft 2015 Annual Groundwater Monitoring Report submitted on June 30, 2015.
- PCB soil analytical results from sampling completed by SME on behalf of M1Concourse, LLC. (To be provided in a subsequent submittal.)

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

- None

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- Current Conditions Report 100%
- Phase III Investigation 100%
 - Completed field investigations in August and December 2012
 - Installed monitoring wells and completed a groundwater monitoring event in 2013
 - Completed additional characterization of Southern dissolved VOC area – April 2015
- 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 99%
 - 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
 - Submitted additional information on September 15, 2014
- Corrective Measures Proposal (CMP) 90%
 - Submitted to USEPA on May 7, 2013, awaiting review by USEPA
- Land Use Restriction 100%
 - Recorded Declaration of Restrictive Covenant on August 7, 2014
- LNAPL Recovery 100%
 - Further LNAPL recovery was not recommended per CA 725 and CMP
 - Completed bulkheading of storm sewers on July 9, 2014
- GW Monitoring 100%
 - Completed 2014 annual monitoring event on July 31 2014
 - Completed 2015 annual monitoring event on May 15, 2015
- Corrective Measures Complete with Controls Report 0%

PROJECTED WORK FOR NEXT REPORTING PERIOD

- Address PCB-impacted soil.

- Meet with USEPA as necessary to discuss project status, update the CA 750 form with the 2015 annual groundwater sampling data, address any comments on the CMP, and/or provide support to USEPA as necessary during preparation of the Statement of Basis and Final Decision process.
- Begin preparation of the Corrective Measures Complete with Controls Report.
- Coordinate with M1 as necessary during site redevelopment.
