



**CONESTOGA-ROVERS
& ASSOCIATES**

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July 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: First Half 2012 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 2012 (January 1, 2012 through June 30, 2012).

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

Sincerely,



Thomas M. Kinney, C.P.G.

TMK/MJC/ds/2/Det.

Encl: Attachment A – First Half 2012 Progress Report

cc: David Favero, RACER
Grant Trigger, RACER



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U.S. Environmental Protection Agency

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ATTACHMENT A

FIRST HALF 2012 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
PCC-VALIDATION, PONTIAC, MICHIGAN

JANUARY 1, 2012 THROUGH JUNE 30, 2012

DESCRIPTION OF WORK COMPLETED

- Performed LNAPL recovery activities at MW69-08 on March 30, 2012
- Prepared and submitted a Sampling and Analysis Plan and Fundamental Quality Assurance Project Plan (SAP/QAPP) on May 7, 2012
- Met on May 9, 2012 to discuss project status and approach and scope of work
- Obtained USEPA comments and responses to SAP/QAPP on June 21, 2012

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% |
| • Phase III Investigation | 20% |

The draft SAP/QAPP was submitted to the USEPA on May 7, 2012.
Comments were provided by USEPA via e-mail on June 21, 2012.



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• CA 725 Environmental Indicator - Human Health	0%
• CA 750 Environmental Indicator – Groundwater	0%
• Corrective Measures Proposal	0%
• LNAPL Recovery	10%
Ongoing LNAPL recovery activities were completed to address AOI 28.	
• GW Monitoring	0%
• Closure Report	0%
• Land Use Restriction	0%

PROJECTED WORK FOR NEXT REPORTING PERIOD

- Meeting with USEPA to discuss project status
- Implement Phase III Investigation field work
- Work with USEPA to prepare and finalize 2013 Annual Environmental Action Budget Request
- Submit Environmental Indicators Report (if necessary data is available)
- 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
March 30, 2012	0.01	8.90	8.97	0.07	9.41	9.42	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.