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Our ref: 12573440-LTR-18

January 15, 2025

Ms. Jennifer Stanhope
RCRA Hazardous Waste Cleanup Program
77 West Jackson Blvd., LR-16J
Chicago, Illinois 60604-3590

2nd 2024 Semi-Annual Progress Report
Performance Based Administrative Order on Consent
Docket Number RCRA 05 2011 0025
Eckles Road Site, Livonia, Michigan
USEPA ID No. MID 005356 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 2nd half of 2024 (July 1, 2024, through December 31, 2024).

Please let us know if you would like to discuss further. Thank you.

Regards,

A handwritten signature in blue ink, appearing to read "Chris Meincke", with a stylized flourish at the end.

Chris Meincke
Associate

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CJM/ls/LTR-18

Encl: Attachment A – 2nd 2024 Semi-Annual Progress Report

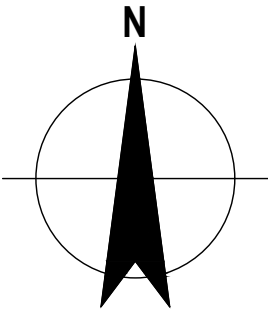
Copy to: Sam Cairns, EGLE
William Burbidge, GLWA
Pam Barnett, RACER
Brendan Mullen, RACER
Jeff Crum, Hamp, Mathews & Associates

Figure



Image Source: Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Accessed: 2023

0 25 50 100 ft
Coordinate System:
STATE PLANE
MI-NAD83
INTERNATIONAL FEET



RACER TRUST
ECKLES ROAD SITE
LIVONIA, MICHIGAN

CONSTRUCTION MONITORING LOCATIONS
PERFORMANCE MONITORING LOCATIONS
AREA 1 INTERM MEASURE COMPONENTS

Project No. 12573440
Date September
2023

FIGURE 1

Table

Table 1

January 2025

Page 1 of 1

**Summary of Monthly Groundwater Treatment Plant Discharge
Area 1 - Former Plating Area
Eckles Road Site
Livonia, Michigan**

Monthly GWTP Discharge Volume (Gallons)	
Month	
July 2024	0
August 2024	0
September 2024	0
October 2024	0
November 2024	0
December 2024	0
Total July 2024 to December 2024 Discharge	0

Notes:

GWTP Pilot Shutdown initiated March 30, 2024

Attachment

Attachment A

2nd Semi-Annual 2024 Progress Report

Attachment A

2nd 2024 Semi-Annual Progress Report Performance-Based Administrative Order on Consent Eckles Road Site, Livonia, Michigan July 1, 2024 to December 31, 2024

1. Description of Work Completed

- Continued Pilot Shutdown of the Area 1 southern French Drain Collection Trench and Groundwater Treatment system (GWTP). Great Lakes Water Authority (GLWA) has been updated on operations. During the second half of 2024 the system collected and discharged 0 gallons of groundwater following commencement of the GWTP shutdown pilot test the end of March. Monthly discharge totals are presented in Table 1. Sump elevation control points for pump operation were adjusted at the end of March 2024 to begin the activities proposed in the Area 1 Groundwater Treatment Plant Pilot Shutdown Work Plan (GHD, March 19, 2024). On March 30, 2024, the sump elevation control points were adjusted from between 693.3 feet above mean sea level (ft. amsl) and 695.3 ft amsl to between 697.0 ft amsl and 698.0 ft amsl. The groundwater elevation within the sump has equalized to approximately 695.3 ft amsl through December 2024. Groundwater elevation measurements were collected periodically from the French drain sump located within Area 1 and select monitoring wells as described in the Area 1 Groundwater Treatment Plant Pilot Shutdown Work Plan, as well as periodic downloads of transducer groundwater elevation data from monitoring wells inside and outside the Area 1 Barrier Wall. Monitoring locations are provided on Figure 1.
- Submitted a revised *Vapor Intrusion Pathway Monitoring Work Plan Phase 2: Proposed Groundwater Extent and Soil Vapor Sampling Strategy for the RACER Eckles Road Off-Site Residential AOI 31* dated July 3, 2024 to USEPA.
- Collected groundwater samples at leading edge monitoring wells in accordance with the *Phase 3 Vapor Intrusion Pathway Monitoring Work Plan* in July 2024.
- Submitted the 1st 2024 Semi-Annual Progress Report dated August 16, 2024, to USEPA.
- Submitted a *March 2024 Spring Seasonal Groundwater and Soil Vapor sample Results* summary technical memorandum dated August 16, 2024 to USEPA.
- Submitted a *Summary of Area 1 Performance Monitoring Activities – June 2023 through May 2024* technical memorandum dated August 16, 2024 to USEPA.
- Collected summer seasonal groundwater and soil gas samples from existing AOI 31 monitoring wells and soil gas probes during August 2024, according to the Phase 2 Work Plan as access to residential properties permitted.
- Collected three, passive, 14-day sanitary sewer vapor samples (plus quality assurance sample) from two manhole locations on Grantland Street and one manhole location on Amrhein Road in August 2024 according to the Phase 2 Work Plan.
- In November 2024, collected fall seasonal groundwater and soil gas samples from new AOI 31 monitoring wells and soil gas probes installed in 2024, according to the Phase 2 Work Plan as access to residential properties permitted.
- Submitted interim sample results packages to USEPA for discussion during virtual meetings.
- Participated in virtual meetings with USEPA on July 31, 2024, August 21, 2024, September 30, 2024, November 8, 2024, November 12, 2024, and December 12, 2024 to discuss the AOI 31 off-site vapor intrusion Pathway investigation and evaluation updates, discuss strategy and work plan development for

the leading edge remedy and “phased” seasonal VI pathway assessment and TCE plume extent for AOI 31.

- Submitted a semi-annual report to GLWA dated September 11, 2024, for the March 2024 through September 2024 reporting period.
- Submitted a *Phase 3 Vapor Intrusion Groundwater and Soil Vapor Sample Results RACER Eckles Road Off-Site Residential AOI 31, Livonia, Michigan* technical memorandum (HMA, September 13, 2024), via email on September 15, 2024 to USEPA and EGLE.
- Submitted an *August 2024 Summer Seasonal Groundwater and Soil Vapor Sample Results* technical memorandum (HMA, October 3, 2024) to USEPA and EGLE.
- Submitted a proposed sampling strategy to investigate the off-site sanitary sewer vapor intrusion pathway via email to USEPA on October 13, 2024.
- Collected ten discrete 4-hour sanitary sewer vapor samples from six manhole locations on Grantland Street and four manhole locations on Amrhein Road in October 2024 according to the October 13, 2024 proposed sampling strategy plan.
- Submitted an *AOI 31 VIAP Interim Measure Work Plan* dated October 14, 2024 for leading-edge remedial activities. Received comments from USEPA and EGLE dated November 6, 2024 and submitted a response to comments summary and *Revised AOI 31 VIAP Interim Measure Work Plan on November 18, 2024*. Received additional comments from USEPA dated December 6, 2024.
- Participated in virtual meeting with the EGLE InSiRT Taps team on October 17, 2024 to discuss proposed remedial activities for the AOI 31 TCE Plume leading edge.
- Submitted a final revised *February 2024 Geoprobe Groundwater and Soil Vapor Sample Results, RACER Eckles Road Off-Site Residential AOI 31, Livonia, Michigan*, dated October 23, 2024 to USEPA.
- Participated in a virtual meeting the USEPA and EGLE on November 18, 2024 to provide an update on the Area 1 GWTP Pilot Shutdown activities, a summary of Area 1 groundwater sampling results and groundwater elevation monitoring through September 2024 and provide an analysis of groundwater elevation and sampling results compared to model predictions.
- Completed Post-Construction and Interim Measure Performance Area 1 Groundwater Monitoring sampling activities September 9, 2024 through September 12, 2024. Area 1 performance monitoring well locations are presented on Figure 1.
- Conducted an inspection and performance evaluation of the Home 7 and Home 8 vapor mitigation systems December 10, 2024.
- Submitted a reapplication package to renew the GLWA Special Discharge Permit – SD6-94508 for the discharged of treated water from the on-site GWTP. The renewed Special Discharge Permit was received from GLWA on December 18, 2024 and expires on December 31, 2025.
- Using an iterative process of collaboration (several draft copies and formal comments), HMA and USEPA developed the *Quality Assurance Project Plan for the Assessment of the Volatilization to Indoor Air Pathway (VI QAPP)*. The final VI QAPP was submitted to USEPA on July 18, 2024, circulated for approval from all non-USEPA listed stakeholders and approved by USEPA on January 6, 2025.
- Participated in meetings with City of Livonia staff, and off-site residents, as necessary, regarding proposed leading edge assessment and remedial activities.

2. Data Collected

- A Summary of Monthly Groundwater Treatment Plant Discharge Volumes is provided in Table 1.

- A summary of off-site groundwater, soil gas, and sanitary sewer vapor sample results from the August 2024 seasonal sampling event was provided under separate cover.
- A summary of groundwater elevations and sample results associated with the Area 1 Construction/Performance Monitoring activities through September 2024 will be provided under separate cover.
- Draft AOI 31 Vapor Intrusion groundwater and soil gas results data packages were provided to USEPA for discussion purposes and development of subsequent scopes of work related to the Phase 2 and Phase 3 work plan activities. A summary of fall seasonal sampling activities will be provided under separate cover.

3. Problems Encountered

- None.

4. Estimated Percent Complete and Information Summary for Selected Activities

- O&M of the Groundwater Pump & Treat System (GWTP, Barrier Wall, Cover) 56%
Continued operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system on an as-needed basis. Chromium VI and nickel treatment is no longer required to discharge to the sanitary sewer under GLWA special discharge permit. GAC installed to treat PFOS. Submitted appropriate discharge reports as per the Special Discharge Permit. (Although not applicable to the current Site remediation strategy, percent complete is estimated as 15 years complete of 27 years estimated in the May 2010 RCES. This metric will be re-evaluated as the interim measures for Area 1 are evaluated and modified as approved by USEPA.) Also see below item - PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring.
- Long-Term Groundwater Monitoring On-going
Long-Term Groundwater Monitoring Plan proposed 5 years of monitoring to verify continued stability/reduction in off-Site/boundary concentrations (anticipated completion 2006 through 2010). Sampling activities are currently planned to continue pending USEPA approval to cease monitoring. Also see below item - PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring.
- Maintenance of the AOI 39 Dust Control Plan 100%
- Restrictive Covenants 100%
Prepared a revised Declaration of Restrictive Covenant (DRC) and Termination of the 2007 DRC and submitted to USEPA on June 25, 2015. Recorded revised DRC and 2007 DRC Termination on August 26, 2015. A DRC for the southwest portion (Area 1) was recorded on April 9, 2019. First Amended and Restated Declaration of Restrictive Covenant was recorded on May 12, 2021, for the southwest portion of the Site (Area 1).
- Vapor Intrusion Investigation 100%
Vapor Intrusion Investigation has been completed and subsequent mitigation has been implemented at two residences, and a VI pathway sampling plan downgradient of previously investigated homes has been approved and is being implemented. See AOI 31 below for additional activities.
- Installation of Vapor Mitigation System 100% (Two homes)

Installation completed and system operational at one home since September 2012. Installation completed and system operational at a second home since January 2018.

- O&M and Performance Monitoring of Vapor Mitigation System On-going System performance monitoring is being implemented annually. Latest system performance monitoring completed December 2023 at two homes.

- Area 1 Pilot Tests - Alternative Chemicals & Target In-Situ Treatment Injection 100%

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 groundwater treatment plant optimization activities were not conducted due to health and safety concerns associated with handling, storing, and mixing the proposed replacement chemicals.

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.

Additional cost and remedial alternative evaluations were performed in 2013. Additional Area 1 Characterization activities have been implemented. A laboratory treatability study was performed using site groundwater to evaluate the effectiveness of utilizing a permeable reactive barrier wall (PRB) with zero valent iron (ZVI) to treat Area 1 groundwater if the existing groundwater collection and treatment system operations are ceased. Groundwater modeling activities were also performed to evaluate the optimal location and number of PRBs and the effects on groundwater flow inside and outside of the Area 1 Barrier Wall.

An additional field pilot test injection was completed in November 2013 and monitoring activities were completed through October 2014 with expanded pilot injections in the northern portion of the Area 1 chromium and nickel-impacted groundwater plume proposed in the 2015 Annual EA Budget Request.

Additional expanded pilot study injections were completed in May through June of 2015 including the injection of sodium sulfide, sodium dithionite, or a combination of the two in 83 injections points in the northern portion of the Area 1 chromium and nickel-impacted groundwater plume. Groundwater monitoring concluded in December 2015. An Area 1 ISCR Pilot Study Summary Report was submitted in January 2016.

- Groundwater Treatment System Decommissioning & Removal 100%

Anticipated to be completed in 2037 per May 2010 RCES but was implemented in 2021 to support the Area 1 interim measure. The existing French drain collection system was retained, and the treatment system was re-located/upgraded as a contingency to the interim measure.

- Completion Report & Well Abandonment 0%

Anticipated to be completed in 2037 per May 2010 RCES but this is likely to change given the interim measure being implemented for Area 1.

- AOI 31 Long-Term VI Pathway Monitoring and Groundwater TCE Remediation 50%

A Long-Term VI Pathway Monitoring Work Plan was approved May 2016 which included a minimum two years of semi-annual/annual soil vapor and groundwater sample collection to evaluate groundwater plume stability, downgradient extent of the groundwater and soil vapor TCE plume, and spatial and temporal variability in TCE soil vapor concentrations. The first semi-annual event was conducted in June 2016. Based on the results of the first event, additional groundwater delineation activities (Phase I Geoprobe®)

were completed during the 1st Quarter of 2017 to further delineate TCE and TCA groundwater plumes and concentrations to determine if modifications are needed to the VI pathway monitoring plan, or if response actions are needed to mitigate potential unacceptable VI risk. Additional permanent monitoring wells and soil vapor probes were installed in June 2017 and were sampled in July 2017, as well as in 2018, 2019, 2020, 2021, and 2022 in coordination with the annual Groundwater Monitoring Program. Subslab soil vapor probes at two homes were resampled in December 2017. Soil vapor samples were collected November/December 2018, December 2019, December 2020, December 2021, and November/December 2022. Preparation of a Long-Term VI pathway risk summary report based on VI sampling results from 2016 through 2021 was prepared and was submitted as a draft report in January 2023.

Groundwater and soil diagnostic sample and hydraulic data were collected June and October 2018 to assist design of an In-Situ Groundwater Remediation of the TCE plume to lessen vapor intrusion pathway risk assessment and mitigation activities in the future at homes downgradient of the plume's current extent. A Draft Work Plan for In-Situ Chemical Oxidation Remediation of TCE at AOI 31 dated June 13, 2019, and revised August 23, 2019 was submitted to USEPA. USEPA submitted technical review comments on March 10, 2020 which are currently under review by RACER.

Per USEPA's approval of the November 16, 2020, scope of work, groundwater monitoring wells MW-103R and MW-202R, as well as soil gas well SG-1R were replaced and sampled in January/February 2021 due to construction-related damage. Soil gas and groundwater samples were collected in December 2021 and December 2022. Sample results will be used to refine the TCE vapor source conceptual site model. Refinement of the vapor pathway CSM in the area downgradient of the southeast corner of the former Site is also under current consideration.

A revised draft Vapor Intrusion Pathway Monitoring Work Plan (Proposed Groundwater and Soil Vapor Sampling Strategy) for the Off-Site Residential AOI 31, dated June 30, 2023 was reviewed by USEPA and comments were provided on September 22, 2023 which formed the basis for the Phase 2 VI Work Plan development. USEPA elected to implement VI monitoring in a "phased approach" to obtain seasonally representative VI data. USEPA approved a revised Phase 1 VI Work Plan for summer groundwater and soil vapor sample collecting, which was implemented early September 2023. The results did not necessitate any near-term VI response activities. A Phase 2 VI Work Plan was submitted and revised based on USEPA comments. Additional Geoprobe groundwater grab sample borings were installed to delineate the side-gradient edges of the plume, along with delineating the leading edge extents of the plume. Additional Phase 3 investigation activities were conducted in June 2024 to delineate the leading edge of the plume. Seasonal groundwater and soil vapor sampling activities continued through 2024 in general accordance with the Phase 2 and Phase 3 Work Plans.

– Area 1 Remedial Implementation – Metals 100%

A request to perform Targeted Area 1 ISCR Injections was submitted to USEPA in April 2016 and approved by USEPA on May 18, 2016. Targeted injections were implemented in August 2016. An Area 1 Full Scale ISCR Work Plan was submitted to USEPA in April 2016 and approved by USEPA on May 18, 2016. Implementation of the work plan activities began September 2016. ISCR injections were completed in November 2016. Performance groundwater monitoring following the ISCR injections was completed in January 2017 and April/May 2017.

An Area 1 Permeable Reactive Gate Evaluation report was submitted to USEPA in September 2017 proposing to install a permeable reactive gate (PRG) along a portion of the eastern alignment of the Area 1 Barrier Wall, to allow groundwater to exit the area surrounded by the barrier wall while being passively treated. An Area 1 Permeable Reactive Gate Work Plan was submitted to USEPA in April 2018. Comments received from USEPA were addressed. The presence of PFAS-impacted groundwater within the Area 1 Barrier wall put implementation of the PRG on hold while the impacts of PFAS being present were evaluated.

Follow-up targeted injections were conducted in December 2017 along the south and southeastern alignments of the Area 1 Barrier Wall (in the vicinity of French drain collection trench and proposed PRG location, where injections had not previously been conducted). Follow-up groundwater monitoring activities were completed in January 2018 and May 2018. Additional groundwater monitoring activities were completed in October 2019. Two additional injections with sodium dithionite were conducted in December 2019 northwest of the field pilot study injection locations. Additional groundwater monitoring activities were completed in October 2020 and January/February 2021.

An interim measure integrating an impermeable cap with development of Area 1 was implemented in 2021 and the first half of 2022.

- Area 1 PFAS and Metals Characterization 90%

Initial groundwater samples were collected during 2017/2018 to evaluate the potential presence of PFAS-impacted groundwater at the Site. PFAS has been detected in groundwater samples within the former Plating Area and GWTP influent/effluent samples at concentrations greater than the USEPA's 2016 Lifetime Health Advisory of 70 ng/L for PFOA and PFOS. Additional characterization activities were completed in 2019 to evaluate horizontal and vertical extents of PFAS-impacted groundwater within Area 1, and how it may impact potential Area 1 remedies. Additional characterization activities to further evaluate shallow PFAS impacted groundwater were conducted in the northern portion of Area 1 in May 2020. Additional characterization activities were conducted in October 2020 to further delineate shallow PFAS-impacted groundwater in the northern and western portions of Area 1, and outside the southern alignment of the Area 1 Barrier wall. Additional site characterization groundwater samples were collected from on-site monitoring wells in 2021. Construction monitoring and performance monitoring groundwater samples were collected from on-site monitoring wells in 2022 and 2023.

Off-site characterization of PFAS and metal groundwater impacts was advanced in January/February 2021 through the collection of groundwater grab samples through drilling equipment. Additional monitoring well installation and groundwater sampling activities were proposed to and approved by USEPA. Two additional monitoring well pairs were installed in December 2021, the remaining proposed monitoring well pair was installed in February 2022. MW-OS-17S/D were inadvertently installed slightly outside of the right-of-way and were abandoned during March 2022 to accommodate planned construction activities of the property owner. Off-Site groundwater samples were collected in February and March/April 2022. A summary of the off-site groundwater and storm sewer sample results was submitted to USEPA and Egle in November 2023. An additional off-site groundwater and storm sewer sampling event was conducted during the first quarter of 2024.

- PFAS Remedy/Interim Measure Evaluation 95%

Potential remedial alternatives to address PFAS-impacted groundwater within Area 1 have been reviewed and summarized. The evaluation was updated per comments from USEPA and resubmitted. An interim measure has been implemented to integrate an impermeable cap with development of Area 1. Additional Remedy/Interim Measure Evaluation activities are being conducted to evaluate the effectiveness of the implemented interim measure.

- PFAS Treatability Pilot Tests 100%

A USEPA approved Scope of Work for a laboratory treatability study has been completed to evaluate several media to evaluate their effectiveness treating PFAS-impacted groundwater. Results were summarized and submitted to USEPA on September 30, 2019 (Additional Permeable Reactive Barrier Treatability Study, GHD, September 30, 2019).

- PFAS Remedy/Interim Measure Design 100%

Design of a cap integrated with development of Area 1 has been developed and implemented. The interim measure incorporates capping and development to reduce infiltration and eliminate/minimize the need for

ongoing groundwater treatment/operation and maintenance activities. An Interim Measures Work Plan was submitted to USEPA for review in December 2020. Comments from USEPA were received and were addressed in a Revised Interim Measures Work Plan which was submitted to USEPA on July 20, 2021 and approved by USEPA on September 29, 2021.

- PFAS Remedy/Interim Measure Implementation 100%

Installation of the cap (a high-density polyethylene liner [HDPE] liner and drainage layer) and cover materials, and construction of a new building, parking and truck dock areas is complete. Interior building slab and finishes were completed during the 1st half of 2022. Installation of pump, controls, and piping for the contingency North French Drain System is pending evaluation of the performance groundwater monitoring results.

- PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring TBD

The previous groundwater treatment plant (GWTP) was supplemented with granular activated carbon in April 2020 to remove PFAS from collected groundwater. Groundwater was collected and treated by the GWTP on an as-necessary basis (responding to precipitation events and generally maintaining the groundwater within the Area 1 Barrier Wall at depths greater than 3 feet bgs) from December 2018 through January 2021 to manage groundwater elevations within the Area 1 Barrier Wall. Since February 2021 groundwater has been collected and treated on an on-going basis. Certain groundwater treatment components were removed from the former GWTP building and relocated into a Conex box. New pump and control components were installed as part of the Interim Measure implementation activities in 2021. Construction monitoring and interim measure performance monitoring groundwater samples were collected from on-site monitoring wells in 2021, 2022, and 2023. O&M tasks are anticipated to change based on implementation and evaluation of the interim measure. A GWTP Pilot Shutdown Work Plan was submitted to USEPA in March 2024 and the GWTP was shutdown down on March 30, 2024 to evaluate the long term recovery of groundwater elevations and potential migration of impacted groundwater from Area 1. Groundwater elevations within the contained area remain stable and the shutdown of the GWTP and groundwater monitoring activities continued through December 2024. A plan for ongoing O&M will be developed after an evaluation of the GWTP pilot shutdown and Interim Measure performance monitoring and groundwater elevation monitoring is completed.

5. Summary of Contacts with Interested Parties

- Correspondence with GLWA regarding Special Discharge Permit activities and required reporting.
- Residents are updated on a one-on-one basis to maintain privacy of VI pathway risk evaluations at their homes.
- Participated in community update meetings with the City of Livonia and residents regarding the AOI 31 vapor intrusion pathway investigation and evaluation activities.
- Property owners south of Area 1 are updated on a one-on-one basis for access to sample monitoring wells.

6. Changes in Personnel

- Pam Barnett is the RACER Deputy Cleanup Manager and contact for the Eckles Road Site.
- Brendan Mullen is the RACER Cleanup Manager for Michigan.

7. Projected Work for Next Reporting Period (January 2025 through June 2025)

- Prepare this 2nd 2024 Semi-Annual Progress Report
- Continue Area 1 performance groundwater monitoring and GWTP pilot shutdown monitoring activities and reporting.
- Continue to work with USEPA and EGLE to address Area 1 impacts and with GLWA to address any discharge issues.
- Continue monitoring groundwater elevations and operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system in accordance with the approved Construction Groundwater Monitoring Plan and Revised Interim Measures Work Plan – Area 1 and GWTP Pilot Shutdown Work Plan.
- Provide a summary of Area 1 groundwater sampling results and elevation monitoring activities through September 2024.
- Continue to implement seasonal soil vapor and groundwater sampling in accordance with approved Vapor Intrusion Pathway Monitoring Work Plans (Proposed Groundwater and Soil Vapor Sampling Strategy) for the off-site Residential AOI 31.
- Submit a revised AOI 31 VIAP Interim Measure Work Plan to address USEPA comments received on December 6, 2024.
- Implement AOI 31 VIAP Interim Measure for the leading edge.
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, as appropriate.

Attachments: Table 1 – Summary of Monthly Groundwater Treatment Plant Discharge Volume
Figure 1 – Construction and Performance Monitoring Locations