



**CONESTOGA-ROVERS
& ASSOCIATES**

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January 15, 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:

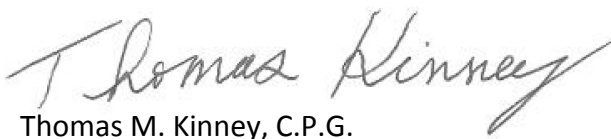
Re: Second Half 2014 Progress Report
Performance-Based Administrative Order on Consent
PCC-Validation, Pontiac, Michigan
USEPA ID#: MID980568836

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 2014 (July 1, 2014 through December 31, 2014).

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Thomas M. Kinney, C.P.G.

TMK/MJC/ds/7/Det.

Encl: Attachment A – Second Half 2014 Progress Report

cc: David Favero, RACER
Grant Trigger, RACER

Equal
Employment Opportunity
Employer

REGISTERED COMPANY FOR
ISO 9001
ENGINEERING DESIGN

ATTACHMENT A

SECOND HALF 2014 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
PCC-VALIDATION, PONTIAC, MICHIGAN

JULY 1, 2014 THROUGH DECEMBER 31, 2014

DESCRIPTION OF WORK COMPLETED

- Completed bulkheading of storm sewer laterals in the LNAPL area on July 9, 2014. A memorandum describing the event and discussion of the GSI pathway was submitted to the United States Environmental Protection Agency (U.S. EPA) on September 12, 2014.
- Completed a water well search of surrounding areas on July 9, 2014 and submitted results to the U.S. EPA on September 12, 2014.
- Recorded a Declaration of Restrictive Covenant (DRC) for the site on August 7, 2014 as a part of the property sales transaction. The DRC restricted or prohibited or requires the following: (1) restricts land use to non-residential; (2) prohibits drinking water wells; (3) prohibits installation of groundwater extraction wells; (4) prohibits contaminated soil relocation; (5) prohibits hazardous substances except pursuant to required agency approvals; (6) owner is responsible for consequences of removing slabs, pavement or other impervious surface; (7) requires contaminated soil management for all excavated or disturbed soils; and, (8) requires soil vapor assessment/management for new structures.
- Submitted a summary of the dissolved volatile organic compound (VOC) area located in the southern portion of the site on September 12, 2014. This summary was requested by the U.S. EPA on July 15, 2014, during a meeting at CRA's office to provide additional evidence for the CA 750 Environmental Indicator determination.
- Submitted and updated the Site's sampling and analysis plan (SAP) for the annual groundwater sampling events to the U.S. EPA on July 25, 2014.
- Completed annual groundwater sampling event on July 29, 2014 through July 31, 2014. The annual sampling event included: (1) 20 of the 24 monitoring wells were sampled and analyzed for VOCs; (2) two of the monitoring wells (MW69-08 and MW84-12) had LNAPL (as anticipated) and were not sampled; (3) two wells (MW48-07 and MW88-12) were not able to be located; (4) one additional parameter, 1,4-dioxane, was reported for monitoring well, MW74-08. This parameter was requested from the laboratory after reviewing the VOC results and observing the presence of 1,1,1-trichlorethane in the MW74-08 sample.

- Completed web conference with U.S. EPA to discuss the Southern VOC Area information and the need for additional delineation.

DATA AVAILABLE DURING THIS TIME PERIOD

- Groundwater analytical results from the annual groundwater sampling event. The data was presented to the U.S. EPA in the 2014 Annual Groundwater Monitoring Report on October 28, 2014.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

- None

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- | | |
|---|------|
| • Current Conditions Report | 100% |
| • Phase III Investigation | 100% |
| Field investigations completed in August and December 2012 | |
| Monitoring well installation and a groundwater monitoring event completed in 2013 | |
| • 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% |
| Declaration of Restrictive Covenant recorded on August 7, 2014. | |
| • LNAPL Recovery | 100% |
| Further LNAPL recovery was not recommended per CA 725 and CMP | |
| Bulkheading storm sewers completed on July 9, 2014 | |

- GW Monitoring 50%
Completed first of two planned annual monitoring events
- Corrective Measures Complete with Controls Report 0%

PROJECTED WORK FOR NEXT REPORTING PERIOD

- Meet with U.S. EPA to discuss project status and/or respond to any comments received from U.S. EPA on the Addendum to/supplemental information for the CA 750 Report, the CMP or SAP/MWAP.
- Meet with U.S. EPA to discuss information with respect to vertical delineation of the VOC groundwater impacts in the Southern VOC Area and complete any necessary additional investigation.
- Conduct a second annual groundwater monitoring event.
- Begin preparation of the Corrective Measures Complete with Controls Report.
- Coordinate with new owners regarding any potential construction impacts on RACER monitoring wells.
