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Transmitted via Electronic Mail

Mr. Chris Black
U.S. Environmental Protection Agency – Region 5
Land and Chemicals Division
77 W. Jackson Blvd. DE-97
Chicago, IL 60604-3590

ENVIRONMENT

Subject:
Second Quarter 2015 Progress Report (No. 16)
Revitalizing Auto Communities Environmental Response (RACER) Trust
Buick City Site, Flint, Michigan

Date:
July 15, 2015

Contact:
Christi Kiker

Dear Mr. Black:

Phone:
248.994.2271

On behalf of Revitalizing Auto Communities Environmental Response Trust (RACER), ARCADIS is submitting this Second Quarter 2015 Progress Report (No. 16) in accordance with Section VI (18b) of the RACER Trust's Administrative Order on Consent (Consent Order), Docket Number RCRA-05-2011-0024 for the Buick City Site located in Flint, Michigan (the Site), which was effective on September 29, 2011.

Email:
Christi.Kiker@arcadis-us.com

Please note that in accordance with General Motors Corporation's Administrative Order on Consent Number R8H-5-00-02 for the North American Operations [NAO] Flint Operations Site (also known as Buick City) Quarterly Progress Reports No.1 through 46 were submitted to the United States Environmental Protection Agency (EPA) documenting Site activities from January 1, 2000 through June 30, 2011.

Our ref:
B0064410.2015

This Second Quarter 2015 Progress Report (No. 16) covers the period of April 1, 2015 through June 30, 2015.

The following briefly summarizes the work performed and data collected, problems encountered, project schedule, and estimated percent complete for a list of activities.

1. Data Collected This Quarter

The samples collected as part of Site investigation or monitoring activities during this quarter are discussed below. This data will be presented to the EPA in the 2015 Annual CMI Report, except as noted below.

1.1 Storm Sewer Water Samples

As required per Part 1, Section A 2 in the current National Pollution Discharge Elimination System (NPDES) Permit No. MI0001597, weekly composite samples were collected from Monitoring Point 003A. This data will be included in the 2015 Yearly Pollutant Minimization Plan (PMP) for PCBs report, which will be submitted to the Michigan Department of Environmental Quality (MDEQ) as required in the NPDES permit.

1.2 Soil Samples

In April, May, and June, ARCADIS collected soil samples as part of the Supplemental Corrective Measures Investigation (SCMI) to delineate and characterize the impacts in soil. A total of 51 soil samples were collected from soil boring locations and submitted for laboratory analysis of PCBs.

1.3 LNAPL Samples

No LNAPL samples were collected during this time period.

1.4 Groundwater Samples

ARCADIS collected 4 samples as part of the annual groundwater sampling event and to characterize groundwater in Outfall 008 Drainage area. The groundwater samples were submitted for laboratory analysis of VOCs, SVOCs, and metals (totals and dissolved).

ARCADIS collected 14 samples to evaluate the presence of 1,4 dioxane at the site. The groundwater samples were submitted for laboratory analysis of SIMS analysis including 1,4 dioxane.

1.5 Vapor Intrusion Samples

11 soil gas samples were collected to evaluate vapor intrusion at the site. These samples were submitted for laboratory analysis of VOCs and/or methane.

2. Work Performed This Quarter

Attachments 1, 2, and 3 present the monthly Site progress reports for April, May, and June that document the work performed this quarter.

3. Problems Encountered

No problems were encountered.

4. Project Schedule – Near-Term Milestone Activities Anticipated During the Next Quarter

A projected field work schedule for the third quarter and fourth quarter of 2015 is included in Attachment 4.

4.1 Routine Work

Task 1 Outfall 003/004 Oil Removal Systems

- Continue OMM inspections of system.

Task 6 Maintain Booms on Outfalls

- Continue to perform inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Dispose of waste as necessary.
- Continue to perform inspections of Oil Interceptor #2.

Task 12 Agency Coordination/Negotiation, Reporting, Project Management

- Continue to participate in regulatory agency calls.
- Prepare Quarterly Report for submittal to EPA.

Task 17 Outfall 003A Weekly Sampling

- Continue Outfall 003A weekly sample collection.
- Continue quarterly P-trap inspections.
- Continue semi-annual SWPPP inspection

Task 19 Remedy Design, Implementation and OM&M

- Continue monitoring of the Outfall 004/013 reroute.
- Generate and submitted monthly POTW report to the City of Flint and monthly air report to MDEQ for the AOI-09B system.
- Continue OM&M phase of Outfall 002 passive recovery trench.

4.2 Non-Routine Work

Task 2 LNAPL Investigation

- Complete additional SCMI investigation of LNAPL areas and impacts.
- Complete the transmissivity investigation and evaluation.

Task 3 LNAPL Recovery Bench and Field-Scale Testing

- Develop and conduct vapor intrusion investigation activities.
- Finalize and submit the AOI 36 Basis of Design.

Task 7 Enhanced Groundwater Monitoring

- Coordinate and complete the 2015 annual groundwater sampling.
- Develop a work plan for additional 1,4-Dioxane investigations and implement field activities.

Task 8 NPDES PLUS Monitoring

- Complete the evaluation of the Factory 84 investigation.
- Complete the Outfall 013 dry weather flow sampling.

Task 12 Agency Coordination/Negotiation, Reporting, Project Management

- Meet with the EPA to discuss site conditions and review plans.

Task 18 Address Soil Impacts

- Complete the AOI 40 Impacted Soil Remedy.

Task 19 Remedy Design, Implementation and OM&M

- Complete reroute of Outfall 004 storm sewer into Outfall 013 storm sewer.
- Select the Outfall 003 infiltration elimination option and begin efforts.
- Develop work plan and implement PCB impacted soils at AOI 81-2.
- Begin evaluation of the AOI83/84-2 remedy options.
- Begin design of the downstream Outfall 004 infiltration elimination options.

5. Estimated Percent Complete

Task 1 Outfall 003/004 Oil Removal Systems

- Outfall 003/004 Oil removal System OM&M – Ongoing

Task 2 LNAPL Investigation

- LNAPL LIF Investigations – 100%
- Southend Natural Source Zone Depletion Study – 100%
- Southend Transmissivity Testing – 100%
- Northend Natural Source Zone Depletion Study – 90%
- Northend Transmissivity Testing – 75%
- Additional LNAPL Investigation – 80%

Task 3 LNAPL Recovery Bench and Field-Scale Testing

- LNAPL Bench Scale Testing – 25%
- LNAPL Pilot Scale Testing – 66%

Task 7 Enhanced Groundwater Monitoring

- Groundwater Monitoring – Ongoing

Task 8 NPDES PLUS Monitoring

- NPDES PLUS Monitoring – Ongoing

Task 9 RCRA Closures, Well Abandonment, Restrictive Covenants, Resolve UST Issues

- Northend RCRA WMU Closures – 90%
- Southend RCRA WMU Closures – 90%
- Northend Restrictive Covenant – 0%
- Southend Restrictive Covenant – 90%
- Monitoring Well Abandonments – 5%
- UST Issue Resolution – 100%

Task 10 Maintain Select Surface Covers

- Maintain Select Surface Covers – Ongoing
- Installation of Additional Surface Cover – Southend – 100%

Task 11 Lead Soil Removal

- Lead Soil Removal – 100%
- Northern Parcel Investigation – 100%
- Northern Parcel Soil Removal – 100%

Task 12 Agency Coordination/Negotiation, Reporting, Project Management

- RFI Phase I Report - 100%
- RFI Phase II Report - 100%
- Human Health Exposure Control EI Report - 100%
- CA 750 Report - 100%
- Revised Corrective Measures Proposal (CMP), May 1, 2008 – 100%
- Revised CMP Addendum No. 1 – 100%
- Southend Corrective Measures Implementation (CMI) Work Plan – 100%
- Revised CMP Addendum No. 2 – Northend and Site-wide Groundwater - 100%
- Revised CMP Addendum No. 2-1 – Response to EPA Comments - 100%
- 2012 CMI Annual Report – 100%
- 2013 CMI Annual Report – 100%

Task 13 Outfall 002/005 Oil Minimization & Investigation

- Outfall 002 Storm Sewer Evaluation - 100%
- Outfall 003 Storm Sewer Evaluation – 60%
- Outfall 004 Re-route into Outfall 013 Evaluation - 90%
- Outfall 005 Storm Sewer Evaluation – 100%
- Outfall 002 Final Measure Implementation– 90%
- Outfall 003 Final Measure Implementation – 30%
- Outfall 005 Final Measure Implementation – 90%
- Outfall 007 Final Measure Implementation – 100%

Task 14 Address 15 Areas of Subsurface LNAPL

- Address 15 Areas of LNAPL – 7%
- AOI 09-B System Design, Permitting, and Construction – 100%

Task 15 LNAPL Recovery OM&M Followed by Secondary LNAPL Remediation

- LNAPL Recovery OM&M – 40%
- Secondary LNAPL Remediation – 0%

6. Budget Status

- 2015 Budget – The 2015 Budget Request was approved by the EPA on December 12, 2014.

If you have any questions, please contact me.

Sincerely,
ARCADIS



Christi Kiker
Project Manager

Copies:

Peter Quackenbush, Michigan Department of Environmental Quality, (via email)
William Yocum, Michigan Department of Environmental Quality (via email)
Flint Public Library
Grant Trigger, RACER Trust (via email)
Dave Favero, RACER Trust (via email)

Attachments:

Attachment 1 – April 2015 Project Update - RACER Buick City Site
Attachment 2 – May 2015 Project Update - RACER Buick City Site
Attachment 3 – June 2015 Project Update - RACER Buick City Site
Attachment 4 – RACER Buick City Field Schedule – 3rd and 4th Quarter 2015



Attachment 1

April 2014 Project Update



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MEMO

To:
Chris Black, USEPA

Copies:
Grant Trigger, RACER
Dave Favero, RACER
Christi Kiker, ARCADIS

From:
Micki M. Maki

Date:
May 15, 2015

ARCADIS Project No.:
B0064410.2015.01202

Subject:
April 2015 Project Update - RACER Buick City Site, Flint, Michigan

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this April 2015 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from April 1, 2015 through April 30, 2015.

Non-Routine OMM Work

Task 2 - LNAPL Investigation

- Continued review and analysis of analytical data and development of electronic boring logs associated with the Supplemental Corrective Measures Investigation (SCMI) investigation.
- Drafted text, tables and figures for SCMI Work Plan Addendum No. 1.
- Completed SCMI investigation waste documentation, container inspections, and disposal.
- Began preparation for well development and transmissivity testing.

Task 3 - LNAPL Recovery Bench and Field - Scale Pilot Testing

- Performed the AOI 36-1/36-2 Multi-Phase Extraction (MPE) Pilot Test.
- Began coordination of upcoming vapor intrusion (VI) work based on the scope of work identified within the Vapor Intrusion Evaluation Memo.

Task 7 - Enhanced Groundwater Monitoring

- Review data received from the groundwater sampling of approximately 50 monitoring wells for the 1,4-Dioxane Investigation.

Task 8 - NPDES PLUS Monitoring

- Finalized the draft Outfall 001 NPMP Data Summary memo.
- Finalized the draft Outfall 006 NPMP Data Summary memo.
- Began drafting the budget for upcoming Factory 84 investigations.

Task 12 – Agency Coordination/Negotiation, Reporting and Project Management

- Finalized and submitted the quarterly EPA report.
- Developed 2015 Buick City Change Order #2.

Task 19 – Remedy Design, Implementation and OM&M

- Complete field activities re-routing the Outfall 004 storm sewer into Outfall 013 storm sewer.
- Began Outfall 004 reroute monitoring.
- Continued coordination of Outfall 003 flow monitoring for potential reroute.

Routine OMM Work

Task 1 - Outfall 003/004 Oil Removal Systems

- Continued OMM activities on the 003/004 system. Activities included inspection of the 003/004 interceptor, weekly gauging, and weekly sampling. Inspections are being performed once per week to ensure that the system is running properly and to determine if any system modifications are warranted to optimize system performance.

Task 6 - Maintain Booms on Outfalls

- Completed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Inspections of the outfalls were performed once per week, prior to forecasted snow events, and following snow events to ensure booms were functioning properly and identify when maintenance events were necessary
- Completed inspections at Oil Interceptor #2 once a week to ensure that the booms are in good order and identify when maintenance events are necessary.

Task 17 – Outfall 003A Weekly Sampling

- Collected weekly NPDES permit samples from the Outfall 003A monitoring point.
- Completed the semi-annual Storm Water Pollution Prevention Plan (SWPPP) site inspection.

Task 19 – Remedy Design, Implementation and OM&M

- Generated and submitted the March monthly POTW report to the City of Flint and March monthly air report to MDEQ for the AOI 09-B system.



Attachment 2

May 2014 Project Update



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MEMO

To:
Chris Black, USEPA

Copies:
Grant Trigger, RACER
Dave Favero, RACER
Christi Kiker, ARCADIS

From:
Tony Maffeo

Date:
June 15, 2015

ARCADIS Project No.:
B0064410.2015.01202

Subject:
May 2015 Project Update - RACER Buick City Site, Flint, Michigan

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this May 2015 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from May 1, 2015 through May 31, 2015.

Non-Routine OMM Work

Task 2 - LNAPL Investigation

- Continued drafting revisions for SCMI Work Plan Addendum No. 1.
- Completed survey work for AOIs as part of SCMI.
- Performed well development and gauging of select wells.
- Continued preparation for transmissivity testing and VI investigations as part of SCMI.

Task 3 - LNAPL Recovery Bench and Field-Scale Pilot Testing

- Performed follow up events to the AOI 36-1/36-2 Pilot Test.

- Continue coordination of upcoming VI work based on the scope of work identified within the Vapor Intrusion Evaluation Memo.
- Begin drafting the BOD for AOI-36 area based on the Pilot Test performed.
- Begin preparing cross sections and performing hydraulic analysis for the AOI-36 BOD.

Task 7 - Enhanced Groundwater Monitoring

- Begin development of Annual Groundwater Sampling Memo and planning for the 2015 groundwater event.
- Review data from groundwater sampling and plan for phase 2 for the 1,4-Dioxane Investigation.

Task 8 - NPDES PLUS Monitoring

- Begin drafting work plan memo for Outfall 13 storm sewer sampling.
- Finalized the draft Outfall 006 NPMP Data Summary memo and submitted to RACER for review.
- Continue preparation for upcoming Factory 84 investigations, well installation and sampling.

Task 12 – Agency Coordination/Negotiation, Reporting and Project Management

- Revise and submit administrative proposal to RACER.
- Review, compiled and summarized surface soil PCB data from AOI 81-2 area for potential property transaction.
- Begin preparing text, tables and figures for the AOI 86-1 Soil Memo.
- Begin preparing WMU #7 Summary Memo.
- Begin preparing text and tables for the Factory 84 Groundwater Memo.
- Begin preparing text and tables for the AOI 3-1 Summary Memo.

- Begin preparing text, figures and tables for the AOI 10-1/10-4 & AOI 05-1/05-5 LNAPL/PCB Delineation Memo.
- Begin drafting the AOI 36-1 Memo.
- Begin drafting the figures, text and tables for the AOI 83/84-2 Memo.
- Continue preparing text, figures and tables for the AOI 81-2 Memo.
- Begin preparing text, figures and tables for the AOI 02-B Memo.

Task 17 – Outfall 003A Weekly Sampling

- Finalize Hazardous Waste User Charge Form to submit to MDEQ.
- Finalize 2014 Yearly Trend Wet Weather Report and 2014 Yearly PMP Report.

Task 18 – Select Surface Cover Inspection

- Begin preparing AOI 40 Select Soil Work Plan.

Task 19 – Remedy Design, Implementation and OM&M

- Prepare and review traffic control plan for upcoming storm sewer flow meter installation.

Routine OMM Work

Task 1 - Outfall 003/004 Oil Removal Systems

Continued OMM activities on the 003/004 system. Activities included inspection of the 003/004 interceptor, weekly gauging, and weekly sampling. Inspections are being performed once per week to ensure that the system is running properly and to determine if any system modifications are warranted to optimize system performance.

Task 6 - Maintain Booms on Outfalls

- Completed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Inspections of the outfalls were performed once per week, prior to forecasted snow events, and

following snow events to ensure booms were functioning properly and identify when maintenance events were necessary

- Completed inspections at Oil Interceptor #2 once a week to ensure that the booms are in good order and identify when maintenance events are necessary.

Task 12 – Agency Coordination/Negotiation, Reporting and Project Management

- Generate April monthly EPA summary memo.

Task 17 – Outfall 003A Weekly Sampling

- Collected weekly NPDES permit samples from the Outfall 003A monitoring point.

Task 19 – Remedy Design, Implementation and OM&M

- Generated and submitted the April monthly POTW report to the City of Flint and April monthly air report to MDEQ for the AOI 09-B system.



Attachment 3

June 2014 Project Update



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MEMO

To:
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Copies:
Grant Trigger, RACER
Dave Favero, RACER
Christi Kiker, ARCADIS

From:
Tony Maffeo

Date:
July 15, 2015

ARCADIS Project No.:
B0064410.2015.01202

Subject:
June 2015 Project Update - RACER Buick City Site, Flint, Michigan

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this June 2015 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from June 1, 2015 through June 30, 2015.

Non-Routine OMM Work

Task 2 - LNAPL Investigation

- Completed soil borings, well installation and sampling as part of SCMI Work Plan Addendum No. 1.
- Completed transmissivity testing and VI investigations as part of SCMI.

Task 3 - LNAPL Recovery Bench and Field-Scale Pilot Testing

- Performed SVMP installation and PCB delineation activities as part of VI investigations.
- Performed follow up events to the AOI 36-1/36-2 Pilot Test.
- Continued development of the Basis of Design/Summary for AOI-36 area based on the Pilot Test performed including the preparation of cross sections and hydraulic analysis.

Task 7 - Enhanced Groundwater Monitoring

- Continued development of the 2014 Annual Groundwater Sampling Memo and planning for the 2015 groundwater event.
- Continued preparation and planning of the phase 2 for the 1,4-Dioxane Investigation.

Task 8 - NPDES PLUS Monitoring

- Finalized and submitted the work plan memo for Outfall 13 storm sewer sampling to the EPA.
- Finalized and submitted the Outfall 001 and 006 data evaluation and request for removal from the NPDES Monitoring program memos to the EPA.
- Completed the Factory 84 investigations, including well installation and sampling.

Task 17 – Outfall 003A Weekly Sampling

- Identified that the Lagoon near James P Cole had substantially filled with water since the previous year. Discussions were held with the City of Flint to determine if any water line issues were present in the area.
- Began the annual review/update of the Storm Water Pollution Prevention Plan.

Task 18 – Select Surface Cover Inspection

- Submitted the draft AOI 40 Select Soil Work Plan to RACER for review.

Task 19 – Remedy Design, Implementation and OM&M

- Began development of the AOI-81-2 excavation work plan.
- Continued modeling and reroute analysis for evaluation of the Outfall 003 reroute option.
- Performed the 002 trench inspection.

Routine OMM Work

Task 1 - Outfall 003/004 Oil Removal Systems

- Continued OMM activities on the 003/004 system. Activities included inspection of the 003/004 interceptor, weekly gauging, and weekly sampling. Inspections are being performed once per week to ensure that the system is running properly and to determine if any system modifications are warranted to optimize system performance.

Task 6 - Maintain Booms on Outfalls

- Completed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Inspections of the outfalls were performed once per week, prior to forecasted snow events, and following snow events to ensure booms were functioning properly and identify when maintenance events were necessary.
- Completed inspections at Oil Interceptor #2 once a week to ensure that the booms are in good order and identify when maintenance events are necessary.

Task 12 – Agency Coordination/Negotiation, Reporting and Project Management

- Generate May monthly EPA summary memo.

Task 17 – Outfall 003A Weekly Sampling

- Collected weekly NPDES permit samples from the Outfall 003A monitoring point.

Task 19 – Remedy Design, Implementation and OM&M

- Generated and submitted the May monthly POTW report to the City of Flint and May monthly air report to MDEQ for the AOI 09-B system.



Attachment 4

3rd and 4th Quarter 2015 Field
Schedule

ID	Task Name	Duration	Start	Finish	Predecessor	May	June	July	August	September	October	4th Quarter November	December
1	Task 1 - Outfall 002/004 Oil Removal Systems	132 days	Wed 7/7/15	Thu 12/16/15									
2	Outfall 002/004 System O&M	132 days	Wed 7/7/15	Thu 12/16/15									
3	Outfall 002/004 System Maintenance Event	10 days	Mon 9/7/15	Fri 9/18/15									
4	Task 2 - Supplemental Investigations	66 days	Wed 7/7/15	Thu 9/29/15									
5	SCM Investigation Field Work	25 days	Wed 7/7/15	Thu 8/12/15									
6	Evaluate Data and Determine Next Steps	20 days	Wed 8/26/15	Thu 9/17/15									
7	Prepare SCM Summary Memo	20 days	Wed 9/23/15	Thu 10/15/15									
8	Vapor Intrusion Investigation	12 days	Wed 7/7/15	Thu 7/28/15									
9	Evaluate Data and Determine Next Steps	20 days	Fri 7/17/15	Thu 8/13/15									
10	Prepare Transmissivity Summary Memo	20 days	Wed 7/7/15	Thu 7/28/15									
11	Task 3 - LMPI, Recovery Bench and Field Scale Pilot Testing	37 days	Wed 7/7/15	Thu 8/20/15									
12	AQI 36.1/36.2 Pilot Test Summary/Basis of Design (BOD) Report	17 days	Wed 7/7/15	Thu 7/23/15									
13	EPA Approval of AQI 36.1 BOD Recommendations	20 days	Fri 7/24/15	Thu 8/20/15									
14	Task 4 - Maintain Booms on Outfalls	132 days	Wed 7/7/15	Thu 12/16/15									
15	Standard O&M	132 days	Wed 7/7/15	Thu 12/16/15									
16	Oil Interceptor #3 Maintenance	132 days	Wed 7/7/15	Thu 12/16/15									
17	Task 7 - Annual Groundwater Monitoring Event	17 days	Wed 7/7/15	Thu 8/19/15									
18	Complete Annual Groundwater Remediation Event	17 days	Wed 7/7/15	Thu 8/19/15									
19	Coordinate and Conduct Meet	30 days	Fri 8/6/15	Thu 10/15/15									
20	Complete LA Downflow Plan Approval	20 days	Wed 7/7/15	Thu 7/28/15									
21	EPA review and Approval Process	30 days	Fri 7/24/15	Thu 9/3/15									
22	Coordinate and Conduct Meet	30 days	Fri 8/6/15	Thu 10/15/15									
23	Task 8 - NPDES Plus Monitoring	132 days	Wed 7/7/15	Thu 12/16/15									
24	Address Metal Impact in the Storm Sewers	132 days	Wed 7/7/15	Thu 12/16/15									
25	Factory #1 Data Evaluation and Determine Next Steps	20 days	Mon 7/27/15	Fri 8/21/15									
26	Outfall 013 Dry Weather Flow Sampling Events	20 days	Mon 8/3/15	Fri 8/28/15									
27	Outfall 013 Dry Weather Flow Data Evaluation and Meet	20 days	Mon 8/31/15	Fri 9/22/15									
28	Task 9 - Agency Coordination/Negotiation, Reporting, Project Management	132 days	Wed 7/7/15	Thu 12/16/15									
29	Reporting	132 days	Wed 7/7/15	Thu 12/16/15									
30	Project Management and Administration	132 days	Wed 7/7/15	Thu 12/16/15									
31	Reporting	89 days	Mon 8/3/15	Thu 11/19/15									
32	Final Decision Issued by EPA	1 day	Mon 8/3/15	Mon 8/3/15									
33	O&M Work Plan	88 days	Thu 8/6/15	Thu 11/19/15									
34	Task 10 - Compliance	132 days	Wed 7/7/15	Thu 12/16/15									
35	Outfall O&M Weekly Sampling and QA/QC	132 days	Wed 7/7/15	Thu 12/16/15									
36	SWPP Annual Review and Inspections	132 days	Wed 7/7/15	Thu 12/16/15									
37	Yearly Trend Monitoring and PAH	132 days	Wed 7/7/15	Thu 12/16/15									
38	Task 11 - Addressing Soil Impacts	88 days	Wed 7/7/15	Thu 11/19/15									
39	Soil Characterization	88 days	Wed 7/7/15	Thu 11/19/15									
40	EPA Review and Approval Process	30 days	Mon 9/21/15	Fri 10/30/15									
41	Remedy Implementation	30 days	Wed 7/7/15	Thu 8/19/15									
42	Task 12 - Remedy Design, Implementation, and O&M	132 days	Wed 7/7/15	Thu 12/16/15									
43	Outfall 002 Passive Recovery Trench O&M	132 days	Wed 7/7/15	Thu 12/16/15									
44	Infrastructure Coordination	132 days	Wed 7/7/15	Thu 12/16/15									
45	System Relocation and Installation Coordination	49 days	Mon 9/21/15	Thu 11/19/15									
46	Outfall 003 Renate Evaluation	70 days	Wed 7/7/15	Thu 10/15/15									
47	Review Data and Determine Next Steps	1 day	Thu 7/23/15	Thu 7/23/15									
48	Review Data and Determine Next Steps	30 days	Wed 7/29/15	Thu 9/17/15									
49	Review Data and Determine Next Steps	20 days	Wed 9/9/15	Thu 10/15/15									
50	Outfall 005 Storm Sewer Renovation Monitoring	20 days	Wed 7/7/15	Thu 7/28/15									
51	Outfall 002 Passive Recovery Trench O&M	132 days	Wed 7/7/15	Thu 12/16/15									
52	Remedy Design and Implementation	132 days	Wed 7/7/15	Thu 12/16/15									
53	Restrictive Comments	100 days	Wed 7/7/15	Thu 11/17/15									
54	Task 13 - AOP System	20 days	Wed 7/7/15	Thu 7/28/15									
55	EPA Review of AOP/OP Shut Down Memo	20 days	Wed 7/7/15	Thu 7/28/15									
56	Task 14 - Outfall 005	109 days	Sat 8/7/15	Thu 12/16/15									
57	Outfall 005	109 days	Sat 8/7/15	Thu 12/16/15									
58	Coord with MDC/OC/OT of Plant	30 days	Sat 8/7/15	Thu 9/23/15									
59	EPA Review and Approval Process	30 days	Fri 9/11/15	Thu 10/22/15									
60	End Outfall 005 Inspections	30 days	Fri 10/23/15	Thu 11/26/15									