



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

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March 15, 2018

Reference No. 085886

Mr. Jacob Hassan
United States Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

Send Via E-mail
(hassan.jacob@epa.gov)

Dear Mr. Hassan:

**Re: Summary of Milestones Completed and Request for U.S. EPA Concurrence
EPA Docket No. RCRA-05-2017-0009
Cline Avenue Oil Spill Site - Gary, Indiana**

As discussed during our call on March 8, 2018, this letter has been prepared to document the major milestones completed under the AOC to date, the corresponding timeframe required under the AOC, the actual timeframe completed and the associated notifications. This letter is requesting concurrence from the U.S. EPA that Oxy is in compliance with the AOC. The AOC was received on March 3, 2017 and identifies the effective date as February 28, 2017.

Assuming U.S. EPA agrees with this letter, GSH requests to seek alignment as to a due date for submittal the FFS report. GSH proposes a due date for the FFS report to be 60 days from the approval date of this letter.

Deliverable/Activity	Due Date per AOC	Date Submitted	Comments
DI/FFS Work Plan	60 days from signed AOC (signed on 2/28/17)	4/28/17 (59 days from signed AOC)	DI/FFS Work Plan was revised on 5/17/17 following discussions with EPA. DI/FFS Work Plan split DI and FFS reports into 2 submissions
Initiate Groundwater Study	21 days from approved Work Plan	Field work initiated on 5/18/17	No formal approval from EPA. Oxy proactively started field activities following notification via email on 5/17/17
Initiate DI/FFS	21 days after approval of DI/FFS Work Plan	Field work initiated on 5/18/17	No formal approval from EPA. Oxy proactively started field activities following notification via email on 5/17/17

Deliverable/Activity	Due Date per AOC	Date Submitted	Comments
DI/FFS Report	180 days from approved DI/FFS Work Plan	DI Report submitted 9/21/17. Additional field data submitted on 11/24/17 via monthly progress report.	Per the Work Plan, FFS Report will be prepared and submitted following approval of the DI Report

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Should you have any questions on the above, please do not hesitate to contact us.

Respectfully submitted,

GLENN SPRINGS HOLDINGS, INC.

David Sweeten

David Sweeten, OXY Project Coordinator

DS/wg/7

cc: Todd Gmitro, EPA (Gmitro.Todd@epa.gov)

Michael Tomka, GHD (Michel.tomka@ghd.com)