

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:
First Quarter 2014 Progress Report (No. 11)
Revitalizing Auto Communities Environmental Response (RACER) Trust
Buick City Site, Flint, Michigan

Date:
April 16, 2014

Contact:
Micki M. Maki, P.E.

Dear Mr. Black:

Phone:
248.994.2271

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this First Quarter 2014 Progress Report (No. 11) 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:
[Micki Maki@arcadis-us.com](mailto:Micki.Maki@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:
B0064410.2014

This First Quarter 2014 Progress Report (No. 11) covers the period of January 1, 2014 through March 31, 2014.

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 2014 Annual CMI Report, except as noted below.

1.1 Storm Sewer Water Samples

In January, February, and March, ARCADIS conducted the “NPDES Plus” Monitoring Program (NPMP) sampling program. The NPMP typically consists of collecting monthly samples from the following Site storm sewers as access allows MP001, MP003, MP006, MP009, MP010, MP011, and MP013. However, due to winter weather some of these locations were inaccessible during this quarters’ sampling events. NPMP samples collected in March were also submitted for dissolved metals analysis, to aid in determining the potential sources of metal impacts in the storm water. This data will be included in the annual CMI Report.

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 2014 Yearly Pollutant Minimization Plan (PMP) for PCBs report, which will submitted to the MDEQ as required in the NPDES permit.

1.2 Soil Samples

In January, February and March ARCADIS collected soil samples as part of the LNAPL area investigations to delineate and characterize the PCB impacts in soil. A total of 163 soil samples were collected from soil boring locations and submitted for laboratory analysis. This data will be included in the LNAPL remedy selection memos.

1.3 LNAPL Samples

In the first quarter, ARCADIS collected a one oil sample from the 003/004 storm sewer system in order to characterize this waste for the upcoming cleaning/maintenance activities that are planned for the second quarter. The LNAPL sample was submitted for laboratory analysis of total PCBs. This data will be included in the annual CMI Report.

In addition, 13 LNAPL samples were collected as part of the PCB delineation activities at the Site and submitted for Laboratory analysis of PCBs. This data will be included in the LNAPL remedy selection memos.

2. Work Performed This Quarter

Attachments 1, 2, and 3 present the monthly Site progress reports for January, February, and March which document the work performed this quarter.

3. Problems Encountered

As mentioned in Section 1, due to winter weather conditions NPMP sampling could not be completed at all locations during this quarters' sampling events. No other problems were encountered.

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

A projected field work schedule for the second and third quarter of 2014 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 8 *NPDES PLUS Monitoring*

- Perform NPMP monitoring in April, May, and June.

Task 10 *Maintain Select Surface Covers*

- Perform semi-annual inspection of surface cover.

Task 12 *Agency Coordination/Negotiation, Reporting, Project Management*

- Continue to participate in regulatory agency calls.
- Prepare Quarterly Report for submittal to EPA.
- Complete Annual CMI report.

Task 13 *Outfall 002/005 Oil Minimization & Investigation*

- Continue quarterly P-trap inspections.

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

- Continue OM&M phase of Outfall 002 passive recovery trench.

4.2 Non-Routine Work

Task 1 Outfall 003/004 Oil Removal System

- Perform annual maintenance event of Outfall 003/004 Oil Removal System. Dispose of waste as necessary.

Task 2 LNAPL Investigation

- Complete additional investigation of LNAPL plumes and impacts.
- Complete evaluation of Site data to aid in selecting methods and locations for additional LNAPL pilot testing.
- Finalize Remedy Recommendation report.

Task 3 LNAPL Recovery Bench and Field-Scale Testing

- Propose pilot testing activities to EPA for approval.

Task 6 Maintain Booms on Outfalls

- Perform maintenance event of Oil Interceptor #2. Dispose of waste as necessary.

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

- Finalize remedy recommendations memos for waste management units (WMU) #3, #7, and #10 to be incorporated in Remedy Recommendation report.

Task 11 Lead Soil Removal

- Complete RFI-38-12 Manganese Soil Removal.

Task 13 Outfall 002/005 Oil Minimization & Investigation

- Complete additional bulkhead activities at select locations.
- Complete review of re-routing options for Outfall 004 and 013 storm sewer with the City of Flint.

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

- Restart OM&M phase of AOI 09-B LNAPL remediation system.

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 – 33%

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 – 95%
- Northern Parcel Investigation – 90%
- Northern Parcel Soil Removal – 25%

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 – 25%

Task 13 Outfall 002/005 Oil Minimization & Investigation

- Outfall 002 Storm Sewer Evaluation - 100%
- Outfall 003 Storm Sewer Evaluation – 50%
- 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 – 25%
- 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 – 25%
- Secondary LNAPL Remediation – 0%

6. Budget Status

- 2014 Budget – The 2014 Budget Request was approved by the EPA on December 16, 2013.
- 2014 Budget Amendment No. 1 – Budget Amendment No. 1 was approved by the EPA on March 7, 2014.

If you have any questions, please call me.

Sincerely,
ARCADIS



Micki Maki, P.E.
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 – January 2014 Project Update - RACER Buick City Site
Attachment 2 – February 2014 Project Update - RACER Buick City Site
Attachment 3 – March 2014 Project Update - RACER Buick City Site
Attachment 4 – RACER Buick City Field Schedule – 2nd and 3rd Quarter 2014



Attachment 1

January 2014 Monthly Update



ARCADIS of Michigan, LLC
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Fax 248 994 2241

MEMO

To:
Chris Black, USEPA

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

From:
Micki Maki

Date:
March 25, 2014

ARCADIS Project No.:
B0064410.2014

Subject:
January 2014 Project Update - RACER Buick City Site, Flint, Michigan

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this January 2014 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from January 1, 2014 through January 31, 2014.

Task 1 - Outfall 003/004 Oil Removal Systems

Routine Work

- Continued operations, maintenance, and monitoring (OMM) activities on the 003/004 system. 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.

Non - Routine Work

- No work performed.

Task 2 - LNAPL Investigation

Routine Work

- No work performed.

Non - Routine Work

- Coordinated and conducted PCB and AOI delineation investigation activities.
- Continued development of Evaluation and Remedy Recommendation memos.
- Continued development and drafting of cross sections.

Task 3 - LNAPL Recovery Bench and Field-Scale Testing

Routine Work

- No work performed.

Non - Routine Work

- Investigated potential pilot test technologies.

Task 4 - Operate Fact. 10 LNAPL/GW System

- Task Completed.

Task 5 - Operate Fact. 36 LNAPL/GW System

- Task Completed.

Task 6 - Maintain Booms on Outfalls

Routine Work

- Performed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Disposed of waste as necessary.
 - As a result of the bulkheading work previously performed at the site, observations of sheen and product at Outfall 002 have dramatically decreased. Recent observations have noted that oxidized oil is very minimal and the amount of emulsified oil has steadily declined since bulkheading activities were completed.
- Performed inspections of Oil Interceptor #2.

Non - Routine Work

- No work performed.

Task 7 - Enhanced Groundwater Monitoring

Routine Work

- No work performed.

Non - Routine Work

- No work performed.

Task 8 - NPDES PLUS Monitoring

Routine Work

- Completed the monthly NPDES Plus Monitoring event for January.

Non - Routine Work

- No work Performed.

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

Routine Work

- No work performed.

Non - Routine Work

- Prepared the Waste Management Unit (WMU) remedy recommendation memos.

Task 10 – Maintain Select Surface Covers

Routine Work

- Completed semi-annual inspection of Select Surface Covers.

Non - Routine Work

- No work performed.

Task 11 - Lead Soil Removal

Routine Work

- No work performed.

Non - Routine Work

- Reviewed and finalized the Northern Parcel excavation work plan.
- Correspondence regarding NPDES and SWPPP requirements for the Northern Parcel and rented portion of AOI 36-1.

Task 12 - Agency Coordination/Negotiation, Reporting, Project Management

Routine Work

- Prepared the Monthly EPA update memo.
- Began coordination and completion of the 2013 CMI Report.

Non - Routine Work

- Attended an EPA meeting to discuss remedy recommendation memo.
- Completed and submitted the 2014 Budget Amendment #1.

Task 13 - Outfall 002/005 Oil Minimization & Investigation

Routine Work

- Not Applicable.

Non - Routine Work

- Finalized and submitted the Outfall 004 Flow Monitoring Memo.
- Began the Outfall 013 storm sewer boom study.
- Reviewed CCTV video and documented notable findings from Outfall 003 and 013 storm sewers.
- Completed the bid solicitation process for the upcoming bulkheading Addendum #2 project.

Task 14 - Address 15 Areas of Subsurface LNAPL

Routine Work

- Not Applicable.

Non - Routine Work

- Continued evaluating possible AOI remedy selections.

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

Routine Work

- Performed OMM activities on the Outfall 002 passive recovery trench.

Non - Routine Work

- Assessed 2013 operation summary and developed 2014 operational options for the AOI 09-B MPE system.



Attachment 2

February 2014 Monthly Update



ARCADIS G&M of Michigan, LLC
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MEMO

To:
Chris Black, USEPA

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

From:
Micki Maki

Date:
March 25, 2014

ARCADIS Project No.:
B0064410.2014

Subject:
February 2013 Project Update - RACER Buick City Site, Flint, Michigan

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this February 2014 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from February 1, 2014 through February 28, 2014.

Task 1 - Outfall 003/004 Oil Removal Systems

Routine Work

- Continued operations, maintenance, and monitoring (OMM) activities on the 003/004 system. 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.

Non - Routine Work

- Completed high density polyethylene (HDPE) pipe jetting of manholes 3-6 and 4-6 to remove blockages from piping to ensure operation of the 003/004 system.

Task 2 - LNAPL Investigation

Routine Work

- No work performed.

Non - Routine Work

- Coordinated and conducted PCB delineation investigation activities.
- Continued development of Evaluation and Remedy Recommendation memos.
- Continued development and drafting of cross sections.

Task 3 - LNAPL Recovery Bench and Field-Scale Testing

Routine Work

- No work performed.

Non - Routine Work

- No work performed.

Task 4 - Operate Fact. 10 LNAPL/GW System

- Task Completed.

Task 5 - Operate Fact. 36 LNAPL/GW System

- Task Completed.

Task 6 - Maintain Booms on Outfalls

Routine Work

- Performed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Disposed of waste as necessary.
 - As a result of the bulkheading work previously performed at the site, observations of sheen and product at Outfall 002 have dramatically decreased. Recent observations have noted that oxidized oil is very minimal and the amount of emulsified oil has steadily declined since bulkheading activities were completed.
- Performed inspections of Oil Interceptor #2.

Non - Routine Work

- No work performed.

Task 7 - Enhanced Groundwater Monitoring

Routine Work

- Began preparation of annual groundwater monitoring report.

Non - Routine Work

- No work performed.

Task 8 - NPDES PLUS Monitoring

Routine Work

- Completed the monthly NPDES Plus Monitoring event.

Non - Routine Work

- Began evaluation of the mercury in the monthly NPMP data, as well as the Site soil and groundwater data.

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

Routine Work

- No work performed.

Non - Routine Work

- Finalized remedy recommendation memos for waste management units (WMU) 3, 7, and 10.

Task 10 – Maintain Select Surface Covers

Routine Work

- Completed select surface covers inspection and documentation.

Non - Routine Work

- No work performed.

Task 11 - Lead Soil Removal

Routine Work

- No work performed.

Non - Routine Work

- Assisted with the preparation and review of documents associated with the sale of the Northern Parcel.

Task 12 - Agency Coordination/Negotiation, Reporting, Project Management

Routine Work

- Prepared the Monthly EPA update memo.
- Continued preparation of the 2013 CMI Report.

Non - Routine Work

- Attended EPA meeting to discuss remedy recommendations.

Task 13 - Outfall 002/005 Oil Minimization & Investigation

Routine Work

- Not Applicable.

Non - Routine Work

- Finalized draft Outfall 001 and 009 Bulkheading Work Plan.
- Awarded Outfall 002 and 005 - Addendum #2 bulkheading project to Job Site Services.
- Met with the City of Flint to discuss the proposed Outfall 004 Reroute.

Task 14 - Address 15 Areas of Subsurface LNAPL

Routine Work

- Not Applicable.

Non - Routine Work

- Continued evaluative possible remedy selections.

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

Routine Work

- Performed OMM activities on the Outfall 002 passive recovery trench.
- Completed the monthly monitoring well gauging at AOI-09-B.

Non - Routine Work

- Developed the AOI-09-B System Summary and Recommendation memo.



Attachment 3

March 2014 Monthly Update



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MEMO

To:
Chris Black, USEPA

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

From:
Micki Maki

Date:
April 15, 2014

ARCADIS Project No.:
B0064410.2014

Subject:
March 2014 Project Update - RACER Buick City Site, Flint, Michigan

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this March 2014 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from March 1, 2014 through March 31, 2014.

Task 1 - Outfall 003/004 Oil Removal Systems

Routine Work

- Continued operations, maintenance, and monitoring (OMM) activities on the 003/004 system. 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.

Non - Routine Work

- Completed high density polyethylene (HDPE) pipe jetting of manholes 3-6 and 4-6 to remove blockages from piping to ensure operation of the 003/004 system.
- Collected oil sample from the Baysaver Storage Unit for waste characterization purposes.

Task 2 - LNAPL Investigation

Routine Work

- No work performed.

Non - Routine Work

- Coordinated and conducted PCB delineation investigation activities.
- Continued development of Remedy Recommendation memos.
- Finalized natural source zone depletion (NSZD) Southend Memo and submitted to EPA.
- Continued development and drafting of cross sections.

Task 3 - LNAPL Recovery Bench and Field-Scale Testing

Routine Work

- No work performed.

Non - Routine Work

- No work performed.

Task 4 - Operate Fact. 10 LNAPL/GW System

- Task Completed.

Task 5 - Operate Fact. 36 LNAPL/GW System

- Task Completed.

Task 6 - Maintain Booms on Outfalls

Routine Work

- Performed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Disposed of waste as necessary.
- Performed inspections of Oil Interceptor #2.

Non - Routine Work

- No work performed.

Task 7 - Enhanced Groundwater Monitoring

Routine Work

- Continued preparation of annual groundwater monitoring report.

Non - Routine Work

- Prepared the Notice Of Migration (NOM) Report pertaining to AOI 83/84-5 LNAPL Area.

Task 8 - NPDES PLUS Monitoring

Routine Work

- Completed the monthly NPDES Plus Monitoring event.

Non - Routine Work

- Continued evaluation of the mercury exceedances.
- Prepared enhanced additional upgradient sampling work plan.

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

Routine Work

- No work performed.

Non - Routine Work

- Finalized remedy recommendation memos for waste management units (WMU) 3, 7, and 10.

Task 10 – Maintain Select Surface Covers

Routine Work

- Completed select surface covers inspection and documentation.

Non - Routine Work

- No work performed.

Task 11 - Lead Soil Removal

Routine Work

- No work performed.

Non - Routine Work

- Assisted with Northern Parcel sale documents.
- Began preparation of the Northern Parcel Manganese Soil Removal Request for Proposal (RFP) Document.

Task 12 - Agency Coordination/Negotiation, Reporting, Project Management

Routine Work

- Prepared the Monthly EPA update memo.
- Continued preparation of the 2013 CMI Report.

Non - Routine Work

- Attended EPA meeting to discuss remedy recommendations.
- Obtain final lien waivers for 2013 invoices.

Task 13 - Outfall 002/005 Oil Minimization & Investigation

Routine Work

- Not Applicable.

Non - Routine Work

- Finalized Outfall 004 Reroute Summary Memo.
- Began locating and marking Outfall 002 and 005 bulkhead and manhole cap locations in preparation of the upcoming bulkheading work.
- Prepared Outfall 002 and 005 Bulkheading Work Plan (Addendum #3) for RACER review.
- Performed Outfall 003 storm sewer reroute surveying.

Task 14 - Address 15 Areas of Subsurface LNAPL

Routine Work

- Not Applicable.

Non - Routine Work

- Continued evaluative possible remedy selections.

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

Routine Work

- Performed OMM activities on the Outfall 002 passive recovery trench.
- Completed the monthly monitoring well gauging at AOI-09-B.

Non - Routine Work

- Finalized the AOI-09-B System Summary and Recommendation memo.
- Performed carbon changeout at the AOI-09-B multi-phase extraction (MPE) system and began preparing for system startup.
- Prepared Outfall 002 passive recovery trench summary memo.



Attachment 4

2nd and 3rd Quarter Field Schedule

RACER Buick City 2014 Field Schedule Second and Third Quarter 2014

ID	Task Name	Qtr 2, 2014			Qtr 3, 2014		
		Apr	May	Jun	Jul	Aug	Sep
1	REMEDIATION ACTIVITIES - Second and Third Quarter						
2	Task 1 - Outfall 003/004 Oil Removal Systems						
3	Subtask 01 - Weekly Inspections						
4	Subtask 03 - Maintenance Event						
5	003/004 Maintenance Event						
6	Task 2 - LNAPL Investigation						
7	Subtask 05 - LNAPL Transmissivity Evaluation (Northend)						
8	Transmissivity Testing						
9	Subtask 06- Miscellaneous LNAPL Evaluation/Testing						
10	Respirometry Testing						
11	Additional LNAPL/PCB Delineation						
12	Task 3 - Benchscale/pilot testing						
13	Pilot Test 1 - Planning						
14	Pilot Test 1 -Field						
15	Pilot test 1 - Reporting						
16	Task 6 - Maintain Booms on Outfalls						
17	Subtask 00 - Oil Interceptor #2 Inspection and Waste Removal						
18	Subtask 01 - Outfall Boom Inspections and Maintenance - 2 hours per day						
19	Task 8 - NPDES PLUS Monitoring						
20	April NPMP Sampling Event						
21	May NPMP Sampling Event						
22	June NPMP Sampling Event						
23	July NPMP Sampling Event						
24	August NPMP Sampling Event						
25	September NPMP Sampling Event						
26	Task 11 - Soil Removal						
27	Northern Parcel Soil Removal						
28	Task 13 - Outfall 002/005 Oil Minimization & Investigation						
29	Subtask 02 - Outfall 002 & 005 Bulkhead implementation						
30	Bulkhead Implementation						
31	Task 15 - LNAPL Recovery OM&M Followed by Secondary LNAPL Remediation						
32	Outfall 002 Passive Recovery Trench						
33	AOI 09-B NAPL Recovery O&M - 2013						
34	AOI 36-1 Preliminary System Installation Activities						

Routine Task Non-Routine Task Drilling Events Construction Events