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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:
Fourth Quarter 2014 Progress Report (No. 14)
Revitalizing Auto Communities Environmental Response (RACER) Trust
Buick City Site, Flint, Michigan

Date:
January 15, 2015

Contact:
Micki M. Maki

Dear Mr. Black:

Phone:
248.994.2271

On behalf of Revitalizing Auto Communities Environmental Response Trust (RACER), ARCADIS is submitting this Fourth Quarter 2014 Progress Report (No. 14) 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

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 Fourth Quarter 2014 Progress Report (No. 14) covers the period of October 1, 2014 through December 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 October, November, and December, 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, MP011, and MP013. The NPMP 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 be submitted to the Michigan Department of Environmental Quality (MDEQ) as required in the NPDES permit.

1.2 Soil Samples

In October, November, and December, ARCADIS collected soil samples as part of the Supplemental Corrective Measures Investigation (SCMI) to delineate and characterize the impacts in soil. A total of 235 soil samples were collected from soil boring locations and submitted for laboratory analysis of volatile organic compounds (VOCs), semi volatile organic compounds (SVOCs), metals, and/or PCBs. This data will be included in the annual CMI Report.

1.3 LNAPL Samples

In the fourth quarter, ARCADIS collected a total of 10 LNAPL sample as part of the SCMI plan. The LNAPL samples were submitted for laboratory analysis of PCBs. This data will be included in the annual CMI report.

1.4 Groundwater Samples

In October, 50 monitoring wells were sampled 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, metals, and/or PCBs.

In December, fifteen monitoring wells in the Outfall 008 drainage area were sampled to confirm the results of the October sampling event. The groundwater samples were submitted for laboratory analysis of metals.

1.5 AOI 09-B System Samples

ARCADIS continues to collect samples from the AOI 09-B Multiphase Extraction (MPE) system as required by the City of Flint Sanitary Use Permit #2-02-RBC001. In accordance with the permit four grab samples and one composite sample are collected from the system effluent line on a monthly basis. The composite sample is submitted for laboratory analysis of ammonia-nitrogen, BOD, total phosphorous, total suspended solids, metals, SVOCs, and PCBs and the grab samples were submitted for laboratory analysis of hexane extractable material (HEM), amenable cyanide, and VOCs plus xylenes. This data is submitted to the City of Flint on a monthly basis in the AOI 09-B Monthly Discharge Report.

In October and November, monthly air samples were collected from the AOI 09-B MPE system as required by the MDEQ Permit # 165-11. Samples were collected from the Thermal Oxidizer influent piping. For endpoint verification, additional samples were collected on a weekly basis July 1, 2014 through August 15, 2014. This data is submitted to the MDEQ on a monthly basis in the AOI 09-B Monthly Air Report.

The system was shut down on November 19, 2014.

2. Work Performed This Quarter

Attachments 1, 2, and 3 present the monthly Site progress reports for October, November, and December 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 fourth quarter of 2014 and first quarter of 2015 is included in Attachment 4. Please note that the 2015 Schedule includes the new tasks that were included in the 2015 Budget Request.

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 January, February, and March.

Task 12 Agency Coordination/Negotiation, Reporting, Project Management

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

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 2 LNAPL Investigation

- Complete additional investigation of LNAPL areas and impacts.
- Complete evaluation of Site data to aid in selecting methods and locations for additional LNAPL pilot testing.

Task 3 LNAPL Recovery Bench and Field-Scale Testing

- Propose treatability study activities for LNAPL infiltration elimination to EPA for approval.
- Conduct the AOI 36 MPE Pilot Test activities.

Task 13 Outfall 002/005 Oil Minimization & Investigation

- Complete the re-routing of Outfall 004 and 013 storm sewer.
- Investigate Outfall 003 storm sewer reroute 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 – 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 – 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



Micki Maki
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 – October 2014 Project Update - RACER Buick City Site
Attachment 2 – November 2014 Project Update - RACER Buick City Site
Attachment 3 – December 2014 Project Update - RACER Buick City Site
Attachment 4 – RACER Buick City Field Schedule – 1st and 2nd Quarter 2015



Attachment 1

October 2014 Project Update



ARCADIS of Michigan, LLC
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MEMO

To:
Chris Black, USEPA

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

From:
Micki M. Maki

Date:
December 4, 2014

ARCADIS Project No.:
B0064410.2014.01202

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

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this October 2014 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from October 1, 2014 through October 31, 2014. Please note that format of the report has been changed slightly to provide more detailed description of activities completed. Also, the summary of routine operations, maintenance, and monitoring (OMM) tasks has been moved to the end of the document.

Task 2 - LNAPL Investigation

- Coordinated traffic control permitting with City of Flint for the Supplemental Corrective Measures Investigation (SCMI) field activities.
- Finalized SCMI drilling investigation request for proposal (RFP), reviewed bids and selected subcontractor.
- Began SCMI investigation field investigation activities at Factory 36.

Task 4 - Operate Fact. 10 LNAPL/GW System

This task was previously completed prior to the month of October 2014. No work was performed during this month for this task.

Task 5 - Operate Fact. 36 LNAPL/GW System

This task was previously completed prior to the month of October 2014. No work was performed during this month for this task.

Task 7 - Enhanced Groundwater Monitoring

- Completed planning and coordination of annual 2014 groundwater monitoring and sampling activities.
- Completed annual 2014 groundwater monitoring and sampling event.

Task 8 - NPDES PLUS Monitoring

- Completed the monthly NPMP sampling event for October.
- Evaluated additional outfall sampling locations upgradient of the River.
- Developed flowchart to outline MS4, CWA, and GSI regulations and how the regulations apply to the Site.

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

- Completed the well survey for the groundwater restrictive zone and finalized the well survey memo and attachments.

Task 11 - Lead Soil Removal

- Finalize Northern Parcel Completion Memo and submitted revision to USEPA.
- Developed follow up letter to the MDEQ discussing sale of Northern Parcel to ASW.
- Coordinated disposal of waste totes.

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

- Finalized and submitted Quarterly Report to Racer for review.
- Finalized and submitted MDEQ bulkheading notification
- Incorporate RACER comments into SCMI work plan, finalize and submit to EPA for review.

Task 13 - Outfall 002/005 Oil Minimization & Investigation

- Performer the Outfall 003 Boom Study Investigation to better define where LNAPL is infiltrating the storm sewers.
- Continued to advance Outfall 004 sewer reroute design, including meeting with the City of Flint and RACER regarding alternatives and development of the work plan.

Task 14 - Address 15 Areas of Subsurface LNAPL

- Continued evaluation of potential remedies for Outfall 003 LNAPL infiltration elimination. The evaluation identified potential data gaps and a ranking of the elimination options based on a variety of effectiveness and implementability criteria.

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.
- Continued coordinating Outfall 003/004 system maintenance event including development of the RFP.

Task 6 - Maintain Booms on Outfalls

- Completed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, 005 and of Oil Interceptor #2. Inspections of the outfalls were performed once per week, prior to forecasted rain events, and following rain 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 15 - LNAPL Recovery OM&M Followed by Secondary LNAPL Remediation

- Completed routine O&M and reporting for the AOI-09B system.
- Developed and reviewed AOI-09 system end point memo.
- Performed weekly O&M visits, monthly monitoring well gauging, monthly system groundwater sample collection, monthly and weekly vapor sample collection at the AOI-09B system. Weekly vapor sample collections were performed to provide additional data sets to better determine whether system operations are nearing asymptotic conditions.
- Generated and submitted the September monthly POTW report to the City of Flint and September monthly air report to MDEQ for the AOI-09B system.
- Completed monthly 002 passive recovery trench inspection and gauging.



Attachment 2

November 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:
December 19, 2014

ARCADIS Project No.:
B0064410.2014.01202

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

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this November 2014 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from November 1, 2014 through November 30, 2014. Please note that format of the report has been changed slightly to provide more detailed description of activities completed. Also, the summary of routine operations, maintenance, and monitoring (OMM) tasks has been moved to the end of the document.

Task 2 - LNAPL Investigation

- Continued Supplemental Corrective Measures Implementation (SCMI) field investigation activities in the Northend of the Site. Completed temporary wells, permanent wells, soil borings and soil sample collection activities.
- Coordinated SCMI investigation waste documentation, container inspections, and disposal.

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

- Finalized Draft Vapor Intrusion Evaluation Memo and submitted to RACER for review.
- Coordinated vapor intrusion (VI) Request for Proposal (RFP) for sampling locations included in the SCMI work plan.
- Postpone implementation of the AOI 36-1/36-2 multi-phase extraction (MPE) pilot test to 2015.

Task 7 - Enhanced Groundwater Monitoring

- Reviewed and tabulated field notes and analytical data from 2014 annual groundwater monitoring event.
- Provided CSX with the analytical data results from samples collected on their property during the annual groundwater sampling event, per the access agreement.
- Coordinated waste characterization and disposal related to the annual groundwater monitoring event.
- Began drafting the 2014 Annual Corrective measures Implementation (CMI) report.

Task 8 - NPDES PLUS Monitoring

- Completed the November monthly NPMP sampling event.
- Additional NPMP sample collected along Outfall 001 storm sewer, downgradient of the Site near the river.
- Prepared for and attended meeting with RACER to discuss groundwater/surface water interface (GSI) criteria and Municipal Separate Storm Sewer (MS4) regulations.
- Evaluated next steps for metals issues at Outfall 006 and 008.

Task 10 – Maintain Select Surface Covers

- Inspect AOI 40 area to determine practicability of slope cover.

Task 11 - Lead Soil Removal

- Assembled waste disposal performance metric report for EPA.
- Continued to coordinate disposal of waste totes.

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

- Finalized and submitted revised SCMI work plan to EPA.
- Drafted letter to City of Flint discussing odors observed along the Outfall 001 storm sewer during NPDES monitoring.
- Submitted Outfall 004 Reroute plans to the City of Flint (11/9/14).

Task 13 - Outfall 002/005 Oil Minimization & Investigation

- Continued evaluation of potential remedies for Outfall 003 LNAPL infiltration elimination. Summarized Outfall 003 Boom Study information. Met with RACER to discuss boom study results and develop Outfall 003 strategy.
- Continued to advance Outfall 004 sewer reroute design. Began preparation of post construction monitoring plan and distributed the Outfall 004 Reroute RFP.

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.
- Continued coordinating Outfall 003/004 system maintenance event including distribution of the RFP and conducting the bid walk.

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 rain events, and following rain 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 15 - LNAPL Recovery OM&M Followed by Secondary LNAPL Remediation

- Completed routine O&M and reporting for the AOI-09B system.
- Revised Draft AOI-09 System memo.
- Performed weekly O&M visits, monthly monitoring well gauging, monthly system groundwater sample collection, monthly and weekly vapor sample collection at the AOI-09B system. Weekly vapor sample collections were performed to provide additional data sets to better determine whether system operations are nearing asymptotic conditions.
- Generated and submitted the October monthly POTW report to the City of Flint and October monthly air report to MDEQ for the AOI-09B system.
- Completed monthly 002 passive recovery trench inspection and gauging.



Attachment 3

December 2014 Project Update



ARCADIS of Michigan, LLC
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MEMO

To:
Chris Black, USEPA

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

From:
Micki M. Maki

Date:
January 15, 2014

ARCADIS Project No.:
B0064410.2014.01202

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

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this December 2014 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from December 1, 2014 through December 31, 2014. Please note that format of the report has been changed slightly to provide more detailed description of activities completed. Also, the summary of routine operations, maintenance, and monitoring (OMM) tasks has been moved to the end of the document.

Task 2 - LNAPL Investigation

- Continued Supplemental Corrective Measures Implementation (SCMI) field investigation activities at multiple AOIs in the Northend and Southend of the Site. Completed temporary wells, permanent wells, soil borings, and soil and LNAPL sample collection activities.
- Began review and analysis of analytical data and development of electronic boring logs associated with the SCMI investigation.
- Coordinated SCMI investigation waste documentation, container inspections, and disposal.

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

- Coordinated vapor intrusion (VI) for sampling locations included in the SCMI work plan.

Task 7 - Enhanced Groundwater Monitoring

- Reviewed and tabulated field notes and analytical data from 2014 annual groundwater monitoring event.
- Provided City of Flint with the analytical data results from samples collected on their property during the annual groundwater sampling event, per the access agreement.
- Coordinated waste characterization and disposal related to the annual groundwater monitoring event.
- Finalize draft 1,4-dioxane Work Plan for RACER review.

Task 8 - NPDES PLUS Monitoring

- Collect samples to assess metals issues at the Outfall 008 in the Former Factory 84 Area.

Task 11 - Lead Soil Removal

- Complete disposal of waste totes.

Task 13 - Outfall 002/005 Oil Minimization & Investigation

- Continued evaluation of potential remedies for Outfall 003 LNAPL infiltration elimination.

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.
- Completed the Outfall 003/004 system maintenance event including the disposal of 35,302 gallons of waste.

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 rain events, and following rain 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.
- Completed a maintenance event for Oil Interceptor #2.

Task 8 - NPDES PLUS Monitoring

- Completed the December monthly NPMP sampling event.

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

- Completed shut down activities for the AOI-09B system.
- Revised Draft AOI-09 System memo.
- Generated and submitted the November monthly POTW report to the City of Flint and November monthly air report to MDEQ for the AOI-09B system.
- Completed the monthly 002 passive recovery trench inspection and gauging.



Attachment 4

1st and 2nd Quarter 2015 Field
Schedule

ID	Task Name	Duration	Start	Finish	Predecessor	January	1st Quarter February	March	April	2nd Quarter May	June
1											
2	Task 1 - Outfall 003/004 Oil Removal Systems	129 days	Thu 1/1/15	Tue 6/30/15		[Task 1 Gantt Bar]					
3	Outfall 003/004 System OMM	129 days	Thu 1/1/15	Tue 6/30/15		[Task 1 Gantt Bar]					
4											
5	Task 2 - Supplemental Investigations	129 days	Thu 1/1/15	Tue 6/30/15		[Task 2 Gantt Bar]					
6	Supplemental Corrective Measures Implementation (SCMI) Work Plan Development	30 days	Mon 1/5/15	Fri 2/13/15		[Task 2 Gantt Bar]					
7	EPA Review and Approval Process	30 days	Mon 2/16/15	Fri 3/27/15	6	[Task 2 Gantt Bar]					
8	Investigation Field Work	20 days	Mon 4/13/15	Fri 5/8/15		[Task 2 Gantt Bar]					
9	Prepare SCMI Summary Memo	20 days	Mon 5/11/15	Fri 6/5/15	8	[Task 2 Gantt Bar]					
10											
11	Vapor Intrusion Investigation	129 days	Thu 1/1/15	Tue 6/30/15		[Task 2 Gantt Bar]					
12											
13	Task 3 - LNAPL Recovery Bench and Field Scale Pilot Testing	55 days?	Mon 3/23/15	Fri 6/5/15		[Task 3 Gantt Bar]					
14	AOI 36-1/36-2 Pilot Test	10 days	Mon 3/23/15	Fri 4/3/15		[Task 3 Gantt Bar]					
15	AOI 36-1/36-2 Pilot Test Summary/Basis of Design (BOD) Report	20 days	Mon 4/13/15	Fri 5/8/15		[Task 3 Gantt Bar]					
16	EPA Approval of AOI 36-1 BOD Recommendations	20 days	Mon 5/11/15	Fri 6/5/15	15	[Task 3 Gantt Bar]					
17											
18	Task 6 - Maintain Booms on Outfalls	129 days	Thu 1/1/15	Tue 6/30/15		[Task 6 Gantt Bar]					
19	Standard OMM	129 days	Thu 1/1/15	Tue 6/30/15		[Task 6 Gantt Bar]					
20	Oil Interceptor #2 Maintenance	129 days	Thu 1/1/15	Tue 6/30/15		[Task 6 Gantt Bar]					
21											
22	Task 8 - NPDES Plus Monitoring	129 days	Thu 1/1/15	Tue 6/30/15		[Task 8 Gantt Bar]					
23	Monthly Sampling Events	129 days	Thu 1/1/15	Tue 6/30/15		[Task 8 Gantt Bar]					
24											
25	Address Metal Impact in Site Storm Sewers	127 days	Mon 1/5/15	Tue 6/30/15		[Task 8 Gantt Bar]					
26											
27	Task 12 - Agency Coordination/Negotiation, Reporting, Project Management	129 days	Thu 1/1/15	Tue 6/30/15		[Task 12 Gantt Bar]					
28	Agency Meetings and Negotiations	129 days	Thu 1/1/15	Tue 6/30/15		[Task 12 Gantt Bar]					
29	Project Management and Administration	129 days	Thu 1/1/15	Tue 6/30/15		[Task 12 Gantt Bar]					
30	Reporting	91 days	Thu 1/1/15	Thu 5/7/15		[Task 12 Gantt Bar]					
31	Final Decision Issued by EPA	1 day	Mon 1/5/15	Mon 1/5/15		[Task 12 Gantt Bar]					
32	CMI Work Plan	88 days	Tue 1/6/15	Thu 5/7/15	31	[Task 12 Gantt Bar]					
33	CMI Annual Report -2015	63 days	Thu 1/1/15	Mon 3/30/15		[Task 12 Gantt Bar]					
34											
35	Task 17 - Compliance	129 days	Thu 1/1/15	Tue 6/30/15		[Task 17 Gantt Bar]					
36	Outfall 003A Weekly Sampling and eDMR's	129 days	Thu 1/1/15	Tue 6/30/15		[Task 17 Gantt Bar]					
37	SWPP annual review and inspections	129 days	Thu 1/1/15	Tue 6/30/15		[Task 17 Gantt Bar]					
38	Yearly Trend Monitoring and PMP	129 days	Thu 1/1/15	Tue 6/30/15		[Task 17 Gantt Bar]					
39											
40	Task 18 - Addressing Soil Impacts	118 days	Thu 1/1/15	Mon 6/15/15		[Task 18 Gantt Bar]					
41	Surface Cover Inspections	1 day	Mon 6/15/15	Mon 6/15/15		[Task 18 Gantt Bar]					
42	2015 Annual Inspection	1 day	Mon 6/15/15	Mon 6/15/15		[Task 18 Gantt Bar]					
43											
44	Surface Cover Installations	100 days	Thu 1/1/15	Wed 5/20/15		[Task 18 Gantt Bar]					
45	Addendum to Soil Cover Work Plan	40 days	Thu 1/1/15	Wed 2/25/15		[Task 18 Gantt Bar]					
46	EPA Review and Approval Process	30 days	Thu 2/26/15	Wed 4/8/15	45	[Task 18 Gantt Bar]					
47	Remedy Implementation	30 days	Thu 4/9/15	Wed 5/20/15	46	[Task 18 Gantt Bar]					
48											
49	Task 19 - Remedy Design, Implementation, and OM&M	129 days	Thu 1/1/15	Tue 6/30/15		[Task 19 Gantt Bar]					
50	AOI 36-1/36-2 MPE System	120 days	Thu 1/1/15	Wed 6/17/15		[Task 19 Gantt Bar]					
51	Infrastructure Coordination	120 days	Thu 1/1/15	Wed 6/17/15		[Task 19 Gantt Bar]					
52											
53	Outfall 004 Storm Sewer Reroute	20 days	Mon 2/9/15	Fri 3/6/15		[Task 19 Gantt Bar]					
54											
55	Outfall 002 Passive Recovery Trench OM&M	129 days	Thu 1/1/15	Tue 6/30/15		[Task 19 Gantt Bar]					
56											
57	Remedy Design and Implementation	129 days	Thu 1/1/15	Tue 6/30/15		[Task 19 Gantt Bar]					
58											
59	Restrictive Covenants	100 days	Thu 1/1/15	Wed 5/20/15		[Task 19 Gantt Bar]					
60											
61	AOI 09-B MPE System	21 days	Mon 1/19/15	Mon 2/16/15		[Task 19 Gantt Bar]					
62	Submit AOI 09-B Completion Memo to EPA	1 day	Mon 1/19/15	Mon 1/19/15		[Task 19 Gantt Bar]					
63	EPA Review and Approval Process	20 days	Tue 1/20/15	Mon 2/16/15	62	[Task 19 Gantt Bar]					
64											
65	Task 20 - Outfall Exit	122 days	Mon 1/12/15	Tue 6/30/15		[Task 20 Gantt Bar]					
66	Outfall 005	122 days	Mon 1/12/15	Tue 6/30/15		[Task 20 Gantt Bar]					
67	Coord with MDEQ/City Of Flint	30 days	Mon 1/12/15	Fri 2/20/15		[Task 20 Gantt Bar]					
68	EPA Review and Approval Process	30 days	Sun 2/22/15	Thu 4/2/15	67	[Task 20 Gantt Bar]					
69	End Outfall 005 Inspections	62 days	Mon 4/6/15	Tue 6/30/15	68	[Task 20 Gantt Bar]					