Glenn Springs Holdings, Inc.

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January 10, 2012

Mr. Kenneth S. Bardo
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Corrective Action Section (LU-9J)
Chicago, IL 60604-3590

RE: Occidental Chemical Corporation, Montague, Michigan - MID 006 014 906
2011 Fourth Quarter Corrective Measures Implementation Progress Report

Dear Mr. Bardo:

The following is a progress report for the corrective measures implementation (CMI) at the Occidental Chemical Corporation site in Montague, Michigan. This report is submitted pursuant to the United Sates Environmental Protection Agency's (U.S. EPA's) Administrative Order (Docket No. V-W-009-'93) Section VI.D.2 and Attachment 4 to the Order and to the "Amended Final Decision and Response to Comments for Occidental Chemical Corporation, Montague Township, Michigan" (October 2010). Glenn Springs Holdings, Inc (GSH) is submitting this quarterly report on behalf of Occidental Chemical Corporation (OCC).

1. A description of the CMI completed to date and projected work.

On October 12, 2010, U.S. EPA issued the Amended Final Decision and Response to Comments for Occidental Chemical Corporation Montague Township, Michigan. Under the Amended Final Decision, progress reports are due quarterly. GSH continues to implement the requirements of the Amended Final Decision, including the voluntary actions.

Operations and Monitoring: During the quarter, GSH continued to collect and treat contaminated groundwater using the existing purge well system located at White Lake. GSH also continued to perform long-term groundwater monitoring in accordance with the Groundwater Monitoring Plan approved by U.S. EPA in January 2004, revision 01. These activities will continue in the next quarter.

Soil Vapor Evaluation: During the fourth quarter, GSH completed the field work for the *Work Plan for Soil Gas Investigation South of Old Channel Trail near Montague, Michigan* dated February 7, 2010 and approved by the U.S. EPA on February 28, 2011. The final, third round of soil vapor samples was collected during November, 2012.

Periodic Technical Review Assessment Report: The first three-year technical review assessment report is due to U.S. EPA in January 2014. GSH is continuing to monitor technical developments and work toward completing the following elements that will be included in the report:

- Literature review to assess whether potentially applicable technologies have become available
- Research programs funded by GSH to study DNAPL at the OCC facility in Montague
- Technical review of long-term groundwater monitoring program and integrity of the remedy

Voluntary Conservation Easement: GSH continues to work toward development of a conservation easement to formalize preservation of the undeveloped and natural setting along portions of Occidental's lakefront property. GSH has been in discussion with the Muskegon Conservation District (MCD) who will be the easement holder. GSH plans to have the conservation easement finalized and in place in 2012. At the request of the MCD, the conservation easement will finalized after the shoreline restoration is complete, which is now anticipated to be in late 2012.

Voluntary Environmental Stewardship Program through Muskegon Conservation District (MCD):

(see attachment)

Additional Voluntary Shoreline Habitat Improvement: The Muskegon Conservation District has delayed the start of the shoreline project due to Army Corps of Engineer permitting delays. Anticipated to start in the 2nd quarter of 2012.

2. Monitoring Data

The purge well performance report is attached.

3. Summaries of all changes made to the CMI.

None.

4. Summary of problems or potential problems and actions being taken to rectify.

None.

5. Changes in personnel.

None.

If you have any questions concerning this information, please contact me at (972) 687-7506.

Sincerely,
Glenn Springs Holdings, Inc.

Clint Babcock
Project Manager

Enclosures
cc: Dan Dailey, MDEQ (P.O. Box 30241, Lansing, MI 48909)
James Tolbert, AECOM

2011 Quarterly (October-December) List of Projects in the White Lake Area

- Continued work with Blue Wing Environmental Solutions & Technology about floating islands for White Lake AOC Habitat Restoration Initiative
- Continued talks with property owners about Phragmites removal for 2012 along White Lake
- Finalizing putting together tasks and needed items for White River Watershed Monitoring Project
- Research of Karner Blue Butterfly for habitat creation
- Continued work with Tanya Cabala on education and outreach service aspects (creating websites, etc.)
- Planting trees on the Conservation Districts Benston Road property for the Global Relief Project
- Putting together No-Till Drill Usage reports and sending in to DNR office
- Going through files (back logs) for White Lake drinking water BUI
- Finalized DEQ end of year permit reports for White Lake and sent in
- Continued checking of engineering plans for calculations and correctness on site plans for Mill Pond and Tannery Bay-East site
- Continued finalizing engineering plans and taking soil samples for the White Lake AOC Habitat Restoration Initiative
- Installation of coir logs at Ravenswood for shoreline protection during winter
- Conducted elevation survey's at Maple Grove Park
- Erosion control work around the culvert at Maple Grove Park
- Moving of project coir logs to new storage area
- Macroinvertebrate sampling, identification and research paper for possible BUI delisting