

October 15, 2018

United States Environmental Protection Agency  
Region 5, Superfund Division  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604

Attn: Ms. Jenny Davison  
Remedial Project Manager  
Superfund Division

Re: Monthly Progress Report for September 2018  
Beck's Lake NPL Site / LaSalle Park Area

Dear Ms. Davison:

On behalf of the City of South Bend and Honeywell International Inc., Veritas, LLC is pleased to submit the Monthly Progress Status Report for the September 2018 reporting period as required by the Consent Order dated October 2, 2015, as amended.

Please contact the undersigned should you have any questions.

Sincerely,



Richard T. Brown  
Project Coordinator

rtb

Cc : Steven D. Murray, CPG Amec Foster Wheeler (Wood)  
Chuck Gadelmann, Honeywell International Inc.  
Stephen A. Studer, Esq. Krieg DeVault LLP  
Kerry A. Dziubek, Esq. Arnold & Porter Kaye Scholer LLP  
Stephanie Steele, Esq., City of South Bend  
Anne Fuchs, City of South Bend

30845 Rockinghorse Lane  
Niles, MI 49120  
(574) 298-4943  
Rick.Brown.Veritasllc@outlook.com

**MONTHLY PROJECT STATUS REPORT FOR SEPTEMBER 2018**  
**BECK'S LAKE NPL SITE / LA SALLE PARK AREA**

**1.0 PROJECT STATUS AND PROGRESS TO DATE**

- Geophysical survey completed.
- Sled hill investigation, sample collection, laboratory analysis, and validation completed.
- Beck's Lake water and sediment sample collection, laboratory analysis, and validation completed.
- Expedited Area (Charles Black Recreation Center) investigation, sampling, laboratory analyses and validation completed.
- Surface soil sampling, laboratory analyses and validation completed.
- Subsurface soil borings and sampling of soil and groundwater, laboratory analyses, and validation completed.
- Soil gas vapor point installation completed, vapor sampling, laboratory analyses and validation completed.
- Monitor well installation completed; monitor well sampling and gauging completed; laboratory analyses and validation completed.
- All monitor wells (including two installed by others), vapor wells, and staff gauge surveyed by licensed land surveyor.
- The Data Evaluation Summary Report for the Expedited Area was completed and submitted to the Environmental Protection Agency (EPA) on November 30, 2016. Comments were received on January 6, 2017 and addressed in the Draft Expedited Area Remedial Investigation (EA RI) report.
- The Draft EA RI was submitted to the EPA on March 27, 2017. Comments were received on April 28, 2017. The response to the EPA's EA RI comments was submitted to the EPA on May 26, 2017, and indicated that in agreement with the EPA, a Final EA RI would not be submitted. The results of the EA RI were incorporated into the LaSalle Park Area (LPA) Focused RI report submitted to EPA on August 11, 2017.
- The Data Evaluation Summary Report for the LPA was submitted to the EPA on April 4, 2017. Comments were received from the EPA and the Indiana Department of Environmental Management (IDEM) on May 16, 2017 and May 12, 2017, respectively. Per May 26, 2017 correspondence, the comments were addressed in the LPA Focused RI Report that was submitted on August 11, 2017.

- The Data Evaluation Summary Report for the LPA was submitted to the EPA on April 4, 2017. Comments were received from the EPA and the Indiana Department of Environmental Management (IDEM) on May 16, 2017 and May 12, 2017, respectively. Per May 26, 2017 correspondence, the comments were addressed in the LPA Focused RI Report that was submitted on August 11, 2017.
- Correspondence was received from the EPA on April 14, 2017, which outlined their suggested approach for approval of the proposed Charles Black Recreation Center (CBRC) building expansion. The response was submitted May 8, 2017.
- A draft Soil Management Plan (SMP) for managing soils during construction activities at the CBRC was submitted to the EPA on July 7, 2017. EPA responded on July 28, 2017. After minor revisions, the SMP was re-submitted on August 18, 2017 and was approved by the EPA on August 21, 2017. Expansion of the CBRC has begun and the SMP has been implemented and will continue through the completion of soil excavation activity and use of the SMP expanded into the park irrigation project.
- EPA held a local public meeting on September 6, 2017 focused on upcoming off-site residential sampling.
- The Draft LPA RI report was submitted to the EPA on August 11, 2017. Comments were received from EPA on September 12, 2017. Following an extension by EPA on October 13, 2017 the revised RI report was submitted to EPA on October 20, 2017. The RI report was conditionally approved by EPA on November 29, 2017.
- A revised schedule culminating in the submittal of the Feasibility Study Report was submitted to the EPA on October 23, 2017 and discussed in November teleconferences.
- The Remedial Action Objectives Technical Memorandum was completed and submitted to EPA on January 5, 2018. EPA and IDEM comments were received March 8, 2018. Comments to be considered as appropriate in the ongoing development of remedial alternatives and to be incorporated into the Feasibility Study.
- Re-development and re-sampling of groundwater from all monitor wells completed in late January, early February 2018. Raw data results received on February 26, 2018 and forwarded to EPA via email. Validation later completed. Data was included in the Screening Alternatives Technical Memorandum submitted to EPA April 9, 2018; EPA has not commented as of the date of this Progress Report.
- EPA and IDEM comments on SLERA Attachment 4 received March 30, 2018; response to comments and revised SLERA submitted to EPA on April 30, 2018. SLERA Attachment 4 comments received from EPA on 9/17/18; PRPs will incorporate response into final RI report.
- Draft Work Plan for Off-Site Waste Delineation Borings and Monitor Wells submitted to EPA for review and approval on August 24, 2018.

- PRPs submitted final revisions to off-site Work Plan and QAPP revisions to EPA on 9/25/18.
- EPA acknowledged on 9/27/18 that they will complete additional off-site sampling along Kenmore.

## **2.0 SUMMARY OF RELEVANT FINDINGS**

- The exposure route and receptor of concern identified in the BHHRA is the inhalation pathway (i.e., dust) for the construction worker. A Soil Management Plan was written, approved by EPA, and implemented for managing this potential risk to CBRC expansion and other construction workers.

## **3.0 SUMMARY OF CHANGES MADE TO FIELD ACTIVITIES**

None this reporting period.

## **4.0 SUMMARY OF DIFFICULTIES ENCOUNTERED**

None this reporting period.

## **5.0 SUMMARY OF ACTION TAKEN TO RECTIFY DIFFICULTIES**

None required this reporting period.

## **6.0 SUMMARY OF ACTIVITIES TO BE PERFORMED IN OCTOBER 2018**

- EPA comments on the Screening Alternatives Technical Memorandum (SA TM) have been put on hold by EPA pending completion of off-site sampling to outside of the LPA. EPA to determine whether to proceed with Comparative Analysis Technical Memorandum or Feasibility Study. Final approval of ASAOC Amendment 2 and SMP Addendum 2 granted. Awaiting agency approval of Work Plan and QAPP revisions for off-site borings and wells.

## 7.0 KEY PERSONNEL CHANGES

- None this reporting period.

## 8.0 DEVIATIONS FROM THE PROPOSED SCHEDULE

- Schedule on hold per EPA per Item 6.0