

October 15, 2021

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

Attn: Mr. Jim Saric
Remedial Project Manager
Superfund Division

Re: Monthly Progress Report for September 2021
Beck's Lake NPL Site / LaSalle Park Area

Dear Mr. Saric:

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 2021 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
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MONTHLY PROJECT STATUS REPORT FOR SEPTEMBER 2021
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. Use of the SMP (Addendum 2) will be expanded into the park for the soccer field irrigation project and other planned activities involving soil disturbance.
- 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, 2017 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 existing LPA monitor wells was completed in late January, early February 2018. Raw data results were received on February 26, 2018 and forwarded to EPA via email. Data validation was later completed. Validated 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 September 17, 2018; 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 September 25, 2018. Plan approved by EPA on October 9, 2018.
- Expansion of the CBRC and the related SMP Addendum 1 implementation was completed on October 31, 2018.
- Waste delineation borings (12) were completed along the Linden Avenue ROW on November 14-15, 2018. No fill material was observed in borings at the proposed well screen interval. Surface and subsurface soil samples were obtained for TAL metals following the approved work plan; laboratory analytical results received; data validation completed.
- Soccer field irrigation system installed in December 2018; SMP compliance monitored during installation.
- New monitor wells along Linden Avenue and soccer field lines surveyed.
- Eight (8) new groundwater monitor wells were installed along the Linden Avenue ROW the week of November 26, 2018; well development and IDW management to the secured storage area followed in December. Wells sampled January 8-18, 2019 along with all existing LPA wells. Analytical results received; data validation completed and submitted to EPA in April.
- The Groundwater Technical Memorandum summarizing the work completed along Linden Avenue and re-sampling of monitor wells within the LPA was submitted to EPA on May 24, 2019. Formal comments not received as of the date of this report.
- Meeting held with EPA in Chicago July 2, 2019 with representatives of EPA and the City of South Bend. Letter response from PRPs sent to EPA on August 8, 2019. Teleconference held September 17, 2019 to clarify issues. Work Plan for additional sampling within the LPA submitted to EPA September 20, 2019; revised and submitted to EPA on October 25, 2019; approved by EPA on October 31, 2019. Field work completed on December 10, 2019. Raw lab data provided EPA on January 24, 2020
- Teleconference May 29, 2020 between PRPs, EPA, and IDEM to agree to “expedited approach” and present conceptual plan for moving forward.
- Removal Action Work Plan (draft) and new ASAOC (draft) sent to EPA on 6/21/21. Waiting on response. Work Plan approved in EPA letter dated September 7, 2021.

2.0 SUMMARY OF RELEVANT FINDINGS

- The exposure route and receptor of concern identified in the Baseline Human Health Risk Assessment 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 2021**

- Prepare bid specifications
- Await signing of revised ASAOC.

7.0 **KEY PERSONNEL CHANGES**

- None on the part of the PRPs.

8.0 **DEVIATIONS FROM THE PROPOSED SCHEDULE**

- Schedule on hold per EPA

