



## Naval Facilities Engineering Command - Atlantic Vieques, Puerto Rico

### Status Report for the Vieques Restoration Advisory Board

Through January 2010

This report provides the Restoration Advisory Board (RAB) with a status of on-going work at the Solid Waste Management Units and Areas of Concern (SWMUs and AOCs) on the former Naval Ammunition Support Detachment (NASD) property in western Vieques and an overview of the Environmental Restoration and Munitions Response activities on eastern Vieques. The following is a summary of the activities completed through January 2010, and the activities planned for completion for the next few months.

## ENVIRONMENTAL RESTORATION PROGRAM

### WEST VIEQUES

- PREQB approved the proposed No Further Action (NFA) under CERCLA for nine west Vieques sites (solid waste management units [SWMUs] 5, 10, 14, 15; areas of concern [AOCs] B, C, F, K, and L) in February 2007.
- **AOC E (Former Waste Oil Tank)**  
The Draft Final Remedial Investigation (RI) Report for AOC E was issued to the RAB in June 2008. No RAB comments were received. The Final RI Report was issued in July 2008. Based on the recommendations in the RI Report, additional sampling to support the Feasibility Study (FS) for AOC E was conducted in July 2008. Evaluation of the data indicates the concentrations of contaminants at the site have declined over time since the removal of the Underground Tank (UST) in 1996. Evaluation of the data further suggests an onsite pilot study (in lieu of an FS) is appropriate to evaluate the capability of a particular remedial technology to accelerate remediation of soil and groundwater contamination. A memorandum detailing the rationale and approach for the pilot study was submitted for regulatory consideration in December 2008. Based on subsequent discussions between the regulatory agencies and the Navy, a work plan for conducting the pilot study was submitted to the regulatory agencies in June 2009. Regulatory comments on the Draft Pilot Study Work Plan were received in August 2009. The comments were resolved and the Draft Final Work Plan issued to the RAB in January 2010.
- **AOC H (Abandoned Power Plant)**

**Note:** This summary is presented in English and Spanish for the convenience of the reader. Every effort has been made for the translations to be as accurate as reasonably possible. However, readers should be aware that the English version of the text is the official version.

**Nota:** Este resumen se presenta en inglés y en español para la conveniencia del lector. Se han hecho todos los esfuerzos para que la traducción sea precisa en lo más razonablemente posible. Sin embargo, los lectores deben estar al tanto que el texto en inglés es la versión oficial.

Based on the RI Report findings, a No Further Action Proposed Plan was made available to the public on January 28, 2008 for a 45-day public comment period. A public meeting to present and discuss the Proposed Plan was held on February 7, 2008. No public comments were submitted to the Navy or EPA (other than questions asked at the Public Meeting). Based on the Proposed Plan, the Record of Decision was signed by the Navy, EPA, and PREQB in September 2008, which released the site from CERCLA without restriction.

- **AOC I (Former Asphalt Mixing Plant)**

The Draft Final RI Report was prepared and issued to the RAB in April 2008. No RAB comments were received on the Draft Final RI Report. The Final RI Report was issued in June 2008. Based on the recommendations in the RI Report, additional sampling to support the FS for AOC I was conducted in July 2008. Evaluation of the data indicates the concentrations of contaminants at the site have declined over time since termination of asphalt plant operations in 1998. Evaluation of the data further suggests an onsite pilot study (in lieu of an FS) is appropriate to evaluate the capability of a particular remedial technology to accelerate remediation of groundwater contamination. A memorandum detailing the rationale and approach for the pilot study was submitted for regulatory consideration in November 2008. Based on subsequent discussions between the regulatory agencies and the Navy, a work plan for conducting the pilot study was submitted to the regulatory agencies in June 2009. Regulatory comments on the Draft Pilot Study Work Plan were received in August 2009. The comments were resolved and the Draft Final Work Plan issued to the RAB in January 2010.

- **AOC J (Former Operations/Staging Area Disposal Site)**

The Final RI Report for AOC J was issued in May 2007. Because waste at the site may have posed a potential risk of future releases of contaminants, the RI Report recommended a waste removal action.

Regulatory agency approval of the Removal Action Work Plan was received in February 2008. Based on the approved work plan, waste profile sampling to determine the appropriate disposition of soil associated with the waste was conducted in February 2008. Risk assessments were performed on the sample data to help determine the appropriate disposition of soil that may be excavated as part of the waste removal action. The risk assessments were submitted for regulatory review in October 2008. Physical removal of the waste and confirmatory sampling was completed in mid 2009 following regulatory approval of the risk assessments. A construction completion report detailing the removal action activities was submitted to the regulatory agencies in September 2009. PREQB submitted comments to the Navy in November 2009. The report is still under review by EPA. Human health and ecological risk assessments using the confirmatory data will be conducted once the regulatory comments on the construction completion report are resolved.

- **AOC R (Former Staging and Operations Area)**

The RI field work, comprising monitoring well installation and surface water, sediment, soil, and groundwater sampling, began in December 2005 and was completed in March 2006. Preliminary evaluation of the analytical data suggests additional data were needed to adequately delineate the nature and extent of contamination and assess potential

risks. This additional data collection took place in August 2009, following completion of the removal action. See the discussion above under AOC J regarding the removal action work, which included AOC R.

Human health and ecological risk assessments will be conducted and an RI Report prepared once the regulatory comments on the construction completion report are resolved.

- **SWMU 4 (Former OB/OD Unit)**

An RI was performed at SWMU 4 in 2007. Preliminary evaluation of the RI data suggested additional sampling was warranted to sufficiently characterize the site. The rationale for additional sampling and the proposed locations was submitted to the regulatory agencies in November 2007. Regulatory comments on the proposed additional sampling were received in January 2008. The comments were resolved in March 2008. The Final Work Plan Addendum was issued and the additional samples were collected between April and August 2008. The Draft RI Report was submitted for regulatory review in August 2009. Regulatory agency comments were received October (PREQB) and November (EPA) 2009. Once the comments are resolved, the Draft Final RI Report will be issued to the RAB.

- **SWMU 6 (Mangrove Disposal Site at Kiani Lagoon)**

The Final SWMU 6 RI Report was issued in February 2007. Because waste at the site may have posed a potential risk of future releases of contaminants, the RI Report recommended a waste removal action. See the discussion above under AOC J regarding the removal action work, which included SWMU 6. Based on preliminary evaluation of the post-removal confirmatory data, additional data collection has been deemed warranted. It is anticipated that a Draft Work Plan for collection of additional data at SWMU 6 will be issued for regulatory agency review in the Spring of 2010.

- **SWMU 7 (Quebrada Disposal Site)**

The Final SWMU 7 RI Report was issued in March 2008. Because the waste at the site may have posed a potential risk of future releases of contaminants, the RI Report recommended a waste removal action. See the discussion above under AOC J regarding the removal action work, which included SWMU 7.

## EASTERN VIEQUES

- **Original 12 SWMUs/AOCs Contained in the RCRA Consent Order**

The Draft Final PA/SI Report (which included 8 PI/PAOC sites, as stated below) was issued to the RAB in April 2008. No RAB comments were received. The Final Report was issued in June 2008. Based on the findings in the PA/SI Report, an Expanded SI was recommended for 7 of the original 12 Consent Order sites; no action was recommended for 4 of the sites; and no action pending the outcome of a groundwater study was recommended for the remaining site.

A Draft SI/Expanded SI Work Plan for the aforementioned 7 Consent Order sites (together with 16 PI/PAOC sites [see below]) was submitted for regulatory agency review in July 2008. Regulatory comments were received in August (PREQB) and October (EPA) 2008. Resolution of the preliminary responses to the comments was

achieved and the Draft Final SI/Expanded SI Work Plan was issued to the RAB in January 2009. No RAB comments were received. The Final SI/Expanded SI Work Plan was issued in February 2009. The SI/Expanded SI fieldwork took place between February and July 2009. The Draft SI/Expanded SI Report was submitted for regulatory agency review in October 2009. PREQB submitted comments to the Navy in December 2009. The report is still under review by EPA.

A Draft No Action Decision Document for the aforementioned 4 Consent Order sites (together with 6 PI/PAOC sites [see below]) was submitted for regulatory agency review in August 2008. Regulatory comments were received in October 2008. The comments were resolved and the Draft Final No Action Decision Document issued to the RAB in December 2008. No RAB comments were received. The Final No Action Decision Document was issued in January 2009.

- **PI/PAOC sites (24 sites currently in the Environmental Restoration Program)**

The Draft Final PA/SI Report (which included the Consent Order sites discussed above) for 8 PI/PAOC sites was issued to the RAB in April 2008. No RAB comments were received. The Final Report was issued in June 2008. Based on the findings in the PA/SI Report, an Expanded SI was recommended for 5 of the 8 PI/PAOC sites; no action was recommended for 1 of the sites; and no action pending the outcome of a groundwater study was recommended for the remaining 2 sites.

For the remaining 16 PI/PAOC sites, the regulatory agencies and Navy met in October 2007 to discuss the path forward for each of the sites. The meeting included a site visit to the majority of the sites. Five sites were determined to require no action. An SI was determined to be necessary for the remaining 11 sites.

The sites requiring an SI were included in the SI/Expanded SI Work Plan discussed above. The sites requiring no action were included in the No Action Decision Document discussed above.

- MUNITIONS RESPONSE PROGRAM
- Progress through January 2010
- 1,447 acres in the LIA, ECA and SIA have been surface cleared
- All beaches (65 acres) have previously been surface cleared
- Over 20,000 live munitions removed
- Approximately 7,500 tons of munitions debris (MD) and range related debris (RRD) has been recovered and is being processed for eventual shipment to a recycler.
- Over 5500 tons of MD and RRD have been shipped off island to be recycled
- Sub Surface investigation has been occurring in the LIA, ECA and SWMU 4, over 7700 anomalies have been investigated

## WEST VIEQUES

- The final work plan for the removal of subsurface Munitions and Explosives of Concern (MEC) at selected roads and beaches was submitted October 2008.

- **SWMU 4 (Open Burn/Open Detonation (OB/OD) Area)**  
The MEC RI investigation data was evaluated along with the environmental restoration investigation data and a RI report was developed presenting both the munitions response and environmental restoration findings. The Draft RI Report was submitted for regulatory review in August 2009.
- A draft engineering evaluation/cost analysis (EE/CA) to remove munitions at selected areas in the vicinity of SWMU 4 and East Vieques was submitted for public review on October 3, 2007. All comments were received and addressed and the EE/CA was finalized February 2008.

### **EASTERN VIEQUES** - Munitions Response Actions

- The Time Critical Removal Action in the LIA is complete with the exception of lagoons that have not dried and the sub munitions area determined to be unsafe to clear without conducting a controlled burn. The Non-Time Critical Removal Action has begun in the SIA. Fourteen hundred forty seven acres have been surface cleared within the LIA, ECA, and SIA, significantly reducing explosive risk in these areas. During these removal efforts over 20,000 munitions items have been removed, including over 10,000 extremely sensitive sub-munitions. Additionally, 65 acres of beaches have previously been surface cleared of munitions.
- Air monitoring is being conducted along the LIA-SIA border to determine if there are metals or explosives releases above National Ambient Air Quality Standards from the BIP activities. To date no metals have exceeded the regulatory standards and no explosives have been detected at these near source locations.
- The Final Expanded Range Assessment/Phase II Site Inspection work plan was submitted December 2006 and further investigation efforts to determine the munitions extent across the east side has been initiated including the subsurface geophysical surveys for the beach areas. The Phase II Site Inspection will also address munitions response sites not yet investigated, by conducting surface evaluations to determine if munitions items are present. The actual field work associated with the Phase II Site Inspection commenced 3 March, 2008 and was temporarily suspended in June. Site inspection activities started again in October 2008 and include an aerial magnetometer survey. The SI field investigation has been completed and the comprehensive SI report for MEC (including both phases of investigation) is being developed.
- The final amendment to the Phase II Site Inspection work plan was submitted September 2008. This amendment includes inspection of additional areas at the former VNTR. As part of this work plan an aerial magnetometer survey was performed. The aerial survey was conducted November and December 2008.
- Digital Geophysical Mapping (DGM) has been conducted on 80 acres of beaches and 24 acres of selected roadways. The mapping will identify anomalies that may indicate the

presence of munitions and explosives of concern (MEC) below the ground surface. DGM operations were suspended on October 12, 2007 but will resume when the sub-surface removal begins. Eventually, approximately 300 acres of beaches and roadways will be geophysical surveyed and will undergo a sub-surface removal. Biological survey of the Eastern Conservation Area was completed to support future removal action activities. An Archaeological survey of the beach areas has been conducted and additional surveys across the entire range will be conducted as needed to support future removal action activities.

- Final EE/CA and Draft Work Plan were submitted for munitions removal action at beach areas and selected roadways on February 6, 2008. The Final work plan to support the subsurface removal efforts was submitted to the regulatory agencies on October 22, 2008.
- A Final Engineering Evaluation/Cost Analysis (EE/CA) was submitted to the regulatory agencies on October 22, 2008 for the removal of surface MEC in the former Surface Impact Area. The final work plan to support the EE/CA was submitted January 2009.

## **OTHER DOCUMENTS AND ACTIONS**

- **Master Standard Operating Procedures, Protocols, and Plans**

The Draft Master Standard Operating Procedures, Protocols, and Plans document was submitted for regulatory review in July 2009. The Master plan document provides standard procedures for data collection, analysis, and evaluation as part of the environmental restoration program. Although project-specific deviations from the Master plan document may be warranted, the Master plan document facilitates consistency and efficiency across the program. Regulatory comments were received in September 2009. Comment resolution and document revisions are ongoing, primarily to ensure robust Master human health and ecological risk assessment protocols. It is anticipated that the Draft Final Master plan document will be issued to the RAB in February or March 2010.

- **Federal Facility Agreement (FFA)**

The Federal Facility Agreement (FFA) was signed by the agencies: U.S. Environmental Protection Agency (EPA), U.S. Department of the Navy, and the Puerto Rico Environmental Quality Board (EQB) and Department of the Interior (DOI). The FFA had a Public Notice with a 45 days comment period. After the comments were addressed the Responsiveness Summary finalized. The FFA was effective beginning on March 28, 2008

- **Site Management Plan**

A Site Management Plan (SMP) was prepared in accordance with requirements defined in the FFA. The Draft Final SMP for FY2010 was submitted for public review in August, 2009.

## **Public Involvement Activities**

- A RAB meeting was held on November 4, 2009 at the Lighthouse.
- Informational Flyers continue to be distributed on a monthly basis on Vieques.
- The Navy organized a photo exhibit on November 18, 2009 at the Multiple Use Center. It showed the progress of the clean up and gave important safety information.
- New warning buoys and warning signs are being stalled on the dangerous areas.

## VIEQUES DOCUMENT SUBMITTAL UPDATE

(As of January 2010)

Site	Document	Submitted By Navy To Regulators or RAB for Review	Regulator or RAB Comments Submitted To Navy
<b>West Vieques</b>			
AOC E	Draft (revised) RI Report	December 2007	February and March 2008
	Preliminary responses to regulatory comments	April 2008	Comments resolved in June 2008
	Draft Final RI Report	Submitted to RAB in June 2008	No comments submitted
	Final RI Report submitted in July 2008	Not Applicable	Not Applicable
	Pilot Study Memorandum	December 2008	Not Applicable
	Draft Pilot Study Work Plan	June 2009	August 2009
	Draft Final Pilot Study Work Plan	January 2010	
AOC H	Draft RI Report	April 2004	October 2005
	Preliminary responses to regulatory comments	January 2006	Discussed in May, September, and December 2006
	Draft Final RI Report	Submitted to RAB in May 2007	No comments submitted
	Final RI Report submitted in July 2007	Not Applicable	Not Applicable
	Draft Proposed Plan	August 2007	September 2007
	Preliminary responses to comments on Draft Proposed Plan	November 2007	Comments resolved in January 2008
	Final Proposed Plan and initiation of 45-day public comment period	January 28, 2007	Not Applicable
	Draft Record of Decision	May 2008	July 2008
Final Record of Decision signed	Not Applicable	Not Applicable	



Site	Document	Submitted By Navy To Regulators or RAB for Review	Regulator or RAB Comments Submitted To Navy
	by Navy, EPA, PREQB in September 2008		
AOC I	Draft RI Report  Preliminary responses to comments  Draft Final RI Report  Final RI Report submitted in June 2008  Pilot Study Memorandum  Draft Pilot Study Work Plan  Draft Final Pilot Study Work Plan	November 2007  March 2008  Submitted to RAB in April 2008  Not Applicable  November 2008  June 2009  January 2010	January 2008  Comments resolved in April 2008  No comments submitted  Not Applicable  Not Applicable  August 2009
AOC R	Final RI Work Plan submitted in November 2005  Draft EE/CA  Final EE/CA  Draft Removal Action Work Plan  Revised Draft Removal Action Work Plan  Response to comments and revised Removal Action Work Plan  Draft Final Removal Action Work Plan  Waste Characterization HHRA Interim Deliverables  Waste Characterization HHRA and ERA  Draft Construction Completion Report	Not Applicable  August 2005  Submitted to RAB/Public in December 2005  November 2005  April 2007  August 2007  January 2008  July 2008  October 2008  September 2009	Not Applicable  October 2005  Not Applicable  March 2006  June 2007  January 2008  Regulatory agency approval in February 2008  August 2008  December 2008  November 2009 (PREQB)

Site	Document	Submitted By Navy To Regulators or RAB for Review	Regulator or RAB Comments Submitted To Navy
SWMU 4	Draft RI Work Plan	June 2004	January 2006
	Preliminary responses to regulatory comments	April 2006	Discussed in May and September 2006
	Draft Final Work Plan	Submitted to RAB in November 2006	Not Applicable
	Final Work Plan submitted in January 2007	Not Applicable	Not Applicable
	Proposed additional sampling locations	November 2007	January 2008
	Preliminary responses to comments	February 2008	Comments resolved in March 2008
	Final Work Plan addendum submitted in April 2008	Not Applicable	Not Applicable
	HHRA Interim Deliverable	October 2008	October 2008 (EPA) November 2008 (PREQB)
SWMU 6	Draft RI Report	April 2004	June 2006
	Preliminary responses to regulatory comments	August 2006	Discussed in December 2006
	Final RI Report submitted in February 2007	Not Applicable	Not Applicable
	Draft EE/CA	August 2005	October 2005
	Final EE/CA	Submitted to RAB/Public in December 2005	Not Applicable
	Draft Removal Action Work Plan	November 2005 April 2007	March 2006
	Revised Draft Removal Action Work Plan	August 2007	June 2007
	Responses to comments and		January 2008

Site	Document	Submitted By Navy To Regulators or RAB for Review	Regulator or RAB Comments Submitted To Navy
	revised Removal Action Work Plan  Draft Final Removal Action Work Plan  Waste Characterization HHRA Interim Deliverables  Waste Characterization HHRA and ERA  Draft Construction Completion Report	January 2008  July 2008  October 2008  September 2009	Regulatory agency approval in February 2008  August 2008  December 2008  November 2009 (PREQB)
SWMU 7	Response to comments on Draft RI Report  Final RI Report  Draft EE/CA  Final EE/CA  Draft Removal Action Work Plan  Revised Draft Removal Action Work Plan  Responses to comments and revised Removal Action Work Plan  Draft Final Removal Action Work Plan  Waste Characterization HHRA Interim Deliverables  Waste Characterization HHRA and ERA  Draft Construction Completion Report	November 2004  March 2008  August 2005  Submitted to RAB/Public in December 2005  November 2005  April 2007  August 2007  January 2008  July 2008  October 2008  September 2009	Discussed in September 2006  Not Applicable  October 2005  Not Applicable  March 2006  June 2007  January 2008  Regulatory agency approval in February 2008  August 2008  December 2008  November 2009 (PREQB)
AOC J	Draft RI Report	April 2004	January 2006

Site	Document	Submitted By Navy To Regulators or RAB for Review	Regulator or RAB Comments Submitted To Navy
	Preliminary responses to regulatory comments  Final RI Report  Draft EE/CA  Final EE/CA  Draft Removal Action Work Plan  Revised Draft Removal Action Work Plan  Responses to comments and revised Removal Action Work Plan  Draft Final Removal Action Work Plan  Waste Characterization HHRA Interim Deliverables  Waste Characterization HHRA and ERA  Draft Construction Completion Report	May 2006  May 2007  August 2005  Submitted to RAB/Public in December 2005  November 2005  April 2007  August 2007  January 2008  July 2008  October 2008  September 2009	Discussed in December 2006  Not Applicable  October 2005  Not Applicable  March 2006  June 2007  January 2008  Regulatory agency approval in February 2008  August 2008  December 2008  November 2009 (PREQB)
NFA Sites	PREQB Response to Public Comments on No Further Action Report  Final NFA Report	Not Applicable  October 2006	Not Applicable  PREQB issued a Resolution and Notification concurring with NFA in February 2007
<b>Eastern Vieques</b>			
SIA	Draft Work Plan for Removal of Surface MEC Draft Final Work Plan for Removal of Surface MEC Final Work Plan for Removal of Surface MEC	July 14, 2008  November 27, 2008  January 2009	

Site	Document	Submitted By Navy To Regulators or RAB for Review	Regulator or RAB Comments Submitted To Navy
SIA	Draft EE/CA for Surface MEC Draft Final EE/CA for Surface MEC Draft Final EE/CA for Surface MEC Removal Final EE/CA for Surface MEC Removal	June 24, 2008 August 2008  September 2008  October 22, 2008	
LIA, SIA, EMA	Draft ERA/Phase II SI Work Plan Amendment Final ERA/Phase II SI Work Plan Amendment	July 14, 2008  September 2008	
LIA, SIA, EMA	Revised Draft ERA/Phase I Site Inspection Report	May 2007	
Former VNTR	Draft EE/CA for subsurface removal of MEC of roads and beaches Draft Final EE/CA for subsurface removal of MEC at roads and beaches Final EE/CA for subsurface removal of MEC at roads and beaches  Draft Work Plan for subsurface removal of MEC of roads and beaches Draft Final Work Plan for subsurface removal of MEC of roads and beaches Final Work Plan for subsurface removal of MEC of roads and beaches	May 2007  To RAB October 3 2007  February 6, 2008  February 6, 2008  August 2008  October 22, 2008	July, 2007
East Vieques Munitions Sites	Final MEC Master Work Plan	Final Submission – November 2006	
Various Munitions Response Sites and Beaches on East Vieques	Final Expanded Range Assessment/Phase II Site Inspection Work Plan	Final submission – December 2006. Editorial comments addressed and submitted – January 2007	
Background Soil	Revised Draft Final Background Soil Inorganics Investigation Work Plan  Final Background Soil Inorganics Investigation Work Plan	Public Comments Submitted to EPA in June 2005  Not Applicable	November 2005  Not Applicable

Site	Document	Submitted By Navy To Regulators or RAB for Review	Regulator or RAB Comments Submitted To Navy
	<p>Draft Background Soil Inorganics Investigation Report</p> <p>Preliminary responses to comments</p> <p>Draft Final Background Soil Inorganics Report</p> <p>Final Background Soil Inorganics Report submitted in October 2007</p>	<p>January 2007</p> <p>May 2007</p> <p>Submitted to RAB August 2007</p> <p>Not Applicable</p>	<p>April 2007</p> <p>Comments resolved July 2007</p> <p>No written RAB comments submitted; verbal comments addressed via conference call</p> <p>Not Applicable</p>
Original 12 Consent Order Sites	<p>Data Summary Report</p> <p>Draft PA/SI Report</p> <p>Preliminary responses to comments</p> <p>Draft Final PA/SI Report</p> <p>Final PA/SI Report submitted in June 2008</p> <p>Draft SI/Expanded SI Work Plan (7 sites)</p> <p>Draft No Action Decision Document (4 sites)</p> <p>Draft Final No Action Decision Document (4 sites)</p> <p>Final No Action Decision Document (4 sites)</p> <p>Draft Final SI/Expanded SI Work Plan (7 sites)</p> <p>Final SI/Expanded SI Work Plan (7 sites)</p>	<p>May 2005</p> <p>November 2007</p> <p>March 2008</p> <p>Submitted to RAB in April 2008</p> <p>Not Applicable</p> <p>July 2008</p> <p>August 2008</p> <p>Submitted to RAB December 2008</p> <p>January 2009</p> <p>Submitted to RAB January 2009</p> <p>February 2009</p> <p>October 2009</p>	<p>Not Applicable</p> <p>January 2008</p> <p>Comments resolved in April 2008</p> <p>No comments received</p> <p>Not Applicable</p> <p>August 2008 (PREQB) October 2008 (EPA)</p> <p>October 2008</p> <p>No comments received</p> <p>Not Applicable</p> <p>No comments received</p> <p>Not Applicable</p>

Site	Document	Submitted By Navy To Regulators or RAB for Review	Regulator or RAB Comments Submitted To Navy
	Draft SI/Expanded SI Report		December 2009 (PREQB)
PI/PAOC Sites	Final PA/SI Work Plan (8 sites)	January 2006	Not Applicable
	Draft PA/SI Report (8 sites)	November 2007	January 2008
	Preliminary responses to comments	March 2008	Comments resolved in April 2008
	Draft Final PA/SI Report (8 sites)	Submitted to RAB in April 2008	No comments received
	Final PA/SI Report (8 sites)	June 2008	Not Applicable
	Draft SI/Expanded SI Work Plan (16 sites)	July 2008	August 2008 (PREQB) October 2008 (EPA)
	Draft No Action Decision Document (6 sites)	August 2008	October 2008
	Draft Final No Action Decision Document (6 sites)	Submitted to RAB December 2008	No comments received
	Final No Action Decision Document (6 sites)	January 2009	Not Applicable
	Draft Final SI/Expanded SI Work Plan (16 sites)	Submitted to RAB January 2009	No comments received
Final SI/Expanded SI Work Plan (16 sites)	February 2009	Not Applicable	
	Draft SI/Expanded SI Report	October 2009	December 2009 (PREQB)
Baseline Groundwater	Draft Final Groundwater Baseline Investigation Report	May 2005	Not Applicable