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CORRECTIVE ACTION MANAGEMENT PLAN CNC CHARLESTON SC  
9/8/1992  
ENSAFE/ ALLEN AND HOSHALL

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**COMPREHENSIVE LONG-TERM  
ENVIRONMENTAL ACTION  
CHARLESTON NAVAL SHIPYARD  
CHARLESTON, SOUTH CAROLINA**

**CORRECTIVE ACTION MANAGEMENT PLAN  
CHARLESTON NAVAL SHIPYARD**

**Prepared for:**

**Department of the Navy  
Southern Division  
Naval Facilities Engineering Command  
Washington, DC**

**SOUTHDIV Contract Number:  
N62467-89-D-0318**



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**September 8, 1992**

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## **1.0 INTRODUCTION**

Nominally, this document is a Corrective Action Management Plan for use during the RCRA Facility Investigation (RFI) planned for the Charleston (South Carolina) Naval Shipyard. As such it discusses scheduling priorities, the grouping of work elements to promote efficiency, interim measures necessary to protect human health or the environment, and the necessity for a groundwater monitoring plan. However, since the RFI is largely investigatory, this document is primarily devoted to management of the investigations to be conducted and discusses corrective action at the facility only to the extent that the need for interim corrective measures may be uncovered during the investigation.

This is not a stand alone document. It is intended for use in conjunction with, and supplements, the RFI Work Plan submitted 17 August 1992 to the U.S. Environmental Protection Agency (USEPA), Region IV and to the South Carolina Department of Health and Environmental Control by the Charleston Naval Shipyard (NSY). It was prepared at the request of USEPA by Southern Division, Naval Facilities Engineering Command (Todd Daniels, Engineer in Charge) under the direction of the Commanding Officer, Charleston Naval Base.

Section 2 of this document discusses the potential need for interim corrective measures to abate contaminant migration if and as such migration is documented during the investigation. Section 3 describes scheduling priorities and the potential for efficiencies through the ordering of SWMUs in the investigation schedule. Sections 4 and 5 provides describe the general schedule for implementing the RFI Work Plan. The actual detailed schedule which has been generated on Time Line is included as an attachment. Finally, Section 6 provides a general plan for developing a groundwater monitoring plan for all existing and future monitoring wells.

## **2.0 INTERIM CORRECTIVE MEASURES**

No interim corrective measures are planned at this time. An earlier draft of the RFI Work Plan had planned interim corrective measures at SWMU #2. However, Hurricane Hugo inundated

the area since it was last sampled and it is uncertain what current lead concentrations are or whether the contamination has spread or attenuated. Consequently, the site will be resampled and interim corrective measures will be revised as necessary.

Interim corrective measures may be appropriate at SWMU #8 if free floating petroleum is detected. Appropriate measures will be proposed as necessary. It currently appears unlikely that interim corrective measures will be warranted at any other site. However, as the RFI is implemented, the need for interim corrective measures will be reevaluated as often as the data warrant. SCDHEC and USEPA will be kept abreast of data indicating that interim corrective measures may be warranted and the need for and approach to such measures will be determined in consultation with the agency project officers.

### **3.0 SOLID WASTE MANAGEMENT UNIT GROUPS**

A total of 36 SWMUs have been identified at the NSY. Table 3-1 list these SWMUs along with the type of investigative action required. Twenty-seven SWMUs have been identified that must be assessed or investigated to implement the RCRA Corrective Action Program at the NSY. A strategy has been developed to make this cumbersome task more manageable and to ensure that high priority SWMUs are investigated in a timely fashion. The 27 SWMUs have been divided into 5 prioritized groups that will be investigated in an overlapping, phased approach (Table 3-2). The groupings were derived based on factors such as potential threat to human health and the environment, geographic locations, and data needs. The rationale used to establish the groups is discussed below.

#### **3.1 Risk**

Data gathered during previous investigations indicates that releases of hazardous constituents to the environment have occurred. Utilizing current data, a Baseline Risk Assessment has been completed at four of the SWMUs while the remaining SWMUs have been evaluated only on a

qualitative basis. The SWMUs that may pose a greater risk to human health and the environment have been assigned a higher priority.

### **3.2 Geographic Location**

The RFI Work Plan describes five sets or sub-groups of SWMUs that will be investigated as though they are five individual sites. Each member of a set shares the same physical location and has contaminant plumes commingled. Data gathering activities for one SWMU of a set will satisfy data gathering needs of the other. For this reason, a group which includes one member of a set also contains the other member(s).

### **3.3 Data Needs**

For certain SWMUs, laboratory analysis of samples will occur in a phased manner. That is, samples from a greater depth or further distance from the source of contamination at a site will be analyzed only after it is determined that shallower (or closer) samples are contaminated. Because of this approach, total laboratory time for a particular SWMU can be several weeks if all samples need to be analyzed. Field activities at those SWMUs with the potential for the greatest amount of laboratory time will be performed early enough in the investigation so that laboratory analysis does not extend well beyond the completion of fieldwork. The schedule assumes that all potential phases of laboratory analysis will have to be performed. Sample analytical work in SWMUs other than the ones with phased analyses will be conducted within normal laboratory turnaround times and will occur concurrently with ongoing field activities. An average turnaround time of three weeks has been proposed in the project schedule. However, sample analytical work will be expedited to a one week (five business days) turnaround time as necessary. An expedited turnaround time will be primarily needed for SWMUs where a phased sampling approach is proposed. For a SWMU that has several laboratory analysis phases, a two day delay is assumed between the results from an earlier phase and the decision to begin the next phase of analysis.

Table 3-1 Solid Waste Management Units (SWMU)		
SWMU #	Description	Action Required
SWMU #1	DRMO Building 1617	RFI
SWMU #2	Lead Contaminated Area	RFI
SWMU #3	Pesticide Mixing Area	RFI
SWMU #4	Pesticide Storage Building	RFI
SWMU #5	Battery Electrolyte Treatment Area	RFI
SWMU #6	Public Works Storage Yard (Old Corral)	RFI
SWMU #7	PCB Transformer Storage Area	RFI
SWMU #8	Oil Sludge Pit Area	RFI
SWMU #9	Closed Landfill	RFI
SWMU #10	Hazardous Waste Storage Facility*	None
SWMU #11	Caustic Pond	None
SWMU #12	Old Fire Fighting Training Area	RFI
SWMU #13	Current Fire Fighting Training Area*	CSI
SWMU #14	Chemical Disposal Area	RFI
SWMU #15	Incinerator*	None
SWMU #16	Paint Storage Bunker	None
SWMU #17	Oil Spill Area	RFI
SWMU #18	PCB Spill Area	None
SWMU #19	Solid Waste Transfer Station*	None
SWMU #20	Waste Disposal Area*	RFI
SWMU #21	Old Paint Storage Area	RFI
SWMU #22	Old Plating Shop Waste Treatment System	RFI
SWMU #23	New Plating Shop WWTS*	None
SWMU #24	Waste Oil Reclamation Facility*	None
SWMU #25	Building 44, Old Plating Operation	RFI
SWMU #26	Waste Storage Area, Building 64-40, Pier C	RFI
SWMU #27	Waste Storage Area, East End, Pier C*	CSI
SWMU #28	Waste Paint Storage Area, West End, Pier C	CSI
SWMU #29	Building X-10	RFI

Table 3-1 Solid Waste Management Units (SWMU)		
SWMU #	Description	Action Required
SWMU #30	Satellite Accumulation Area, Building 13*	CSI
SWMU #31	Waste Paint Storage Area, Dry Dock No. 5	CSI
SWMU #32	Waste Paint Storage Area, Building 195	CSI
SWMU #33	Waste Paint Storage Area, West End, Dry Dock No.2	CSI
SWMU #34	MWR, SW of Building X-10	RFI
SWMU #35	Building X-12	RFI
SWMU #36	Building 68, Battery Shop*	RFI

\* SWMUs which are still in use.

Table 3-2 Solid Waste Management Unit Groups		
Group #	SWMU #	Description
I	SWMU #1	DRMO Building 1617
	SWMU #2	Lead Contaminated Area
	SWMU #21	Old Paint Storage Area
	SWMU #22	Old Plating Shop Waste Treatment System
	SWMU #25	Building 44, Old Plating Operation
II	SWMU #8	Oil Sludge Pit Area
	SWMU #9	Closed Landfill
	SWMU #20	Waste Disposal Area
	SWMU #29	Building X-10
	SWMU #34	MWR, SW of Building X-10
	SWMU #35	Building X-12
III	SWMU #6	Public Works Storage Yard (Old Corral)
	SWMU #7	PCB Transformer Storage Area
	SWMU #12	Old Fire Fighting Training Area
	SWMU #14	Chemical Disposal Area
	SWMU #17	Oil Spill Area
IV	SWMU #3	Pesticide Mixing Area
	SWMU #4	Pesticide Storage Building
	SWMU #5	Battery Electrolyte Treatment Area
	SWMU #36	Building 68, Battery Shop

Table 3-2 Solid Waste Management Unit Groups		
Group #	SWMU #	Description
V	SWMU #13	Current Fire Fighting Training Area
	SWMU #27	Waste Storage Area, East End, Pier C*
	SWMU #28	Waste Paint Storage Area, West End, Pier C
	SWMU #30	Satellite Accumulation Area, Building 13*
	SWMU #31	Waste Paint Storage Area, Dry Dock No. 5
	SWMU #32	Waste Paint Storage Area, Building 195
	SWMU #33	Waste Paint Storage Area, West End, Dry Dock No.2

#### **4.0 SCHEDULING OF RFI FIELD WORK**

Field activities will commence within ten weeks of final Agency approval of the RFI Work Plan. A brief description of the work schedule for each SWMU is provided below. The days referred to are the business days of the schedule.

A Time Line schedule for implementation of the RFI Work Plan including Phase I field work, laboratory analyses, a Phase II investigation period and preparation and submittal of RFI Contamination Assessment Reports is included as an attachment.

The implementation of field work will involve several teams of sampling personnel. This will allow multiple group investigations to be conducted concurrently. It is currently anticipated that Groups I, II, and III will be investigated concurrently. For this reason, the SWMUs that were assigned the highest priority have been divided amongst these groups in such a manner that each of the first three groups actually carries an similar weighting.

#### **4.1 Phase I**

##### **GROUP I**

**SWMUs #1 and #2:** The boundary of SWMU #2 encompasses that of SWMU #1; therefore, the investigation of these SWMUs will be done concurrently. These SWMUs have been assigned the highest priority in Group I. Field activities are anticipated to take three weeks.

**SWMU #21:** SWMU #21 has been assigned the lowest priority in Group I. Surface soil sampling, monitoring well installations, and sediment sampling will succeed activities at SWMUs #22 and #25.

**SWMUs #22 and #25:** SWMUs #22 and #25 are also located in close proximity to one another and will be investigated as one site. Field activities will be implemented upon completion of those at SWMUs #1 and #2.

## **GROUP II**

**SWMU #8:** SWMU #8 has been assigned the highest priority in Group II. Soil boring and sampling, pit sampling, and monitoring well installation and sampling is anticipated to last approximately two weeks.

**SWMUs #9 and #20:** The geophysical survey was initiated in May 1992 per an agreement between USEPA and NSY, and is currently scheduled for completion in late September 1992. The soil gas survey was implemented on 3 June 1992 and subsequently completed on 22 June 1992. The proposed soil boring/sampling, monitoring well installation/sampling, sediment sampling, and trenching activities are slated to begin in February 1993.

**SWMUs #29, #34, and #35:** Soil sampling will begin at SWMUs #29, #34, and #35 upon completion of field activities at SWMUs #9 and #20. These SWMUs make up one sub-groups previously mentioned and received a high priority due to the phased analytical approach and the possibility that additional sampling may be warranted in Phase II. Soil borings and sampling should take approximately two days.

## **GROUP III**

**SWMUs #6 and #7:** SWMUs #6 and #7 will be investigated as one site and represent another of the sub-groups mentioned above. These SWMUs were assigned the highest priority in Group III. Soil sampling activities will focus primarily on SWMU #7; however, the groundwater investigation is intended to address both SWMUs. Monitoring well installation/sampling and soil sampling is anticipated to last slightly over two weeks.

**SWMU #12:** Field activities at SWMU #12 will entail the installation of 25 soil borings. Initiation of work is scheduled to begin upon completion of the investigative activities at SWMUs #6 and #7, and last approximately one week.

**SWMU #14:** The geophysical survey described in the Work Plan has already been completed at SWMU #14. The soil boring/sampling and monitoring well installation/sampling program will be implemented as part of Phase I of the RFI. Phase I field activities are anticipated to last approximately two weeks.

**SWMU #17:** This will be the final SWMU investigated in Group III. The scope of work includes the installation of four monitoring wells with an expected one week completion time.

#### **GROUP IV**

**SWMU #3:** SWMU #3 is the first SWMU to be investigated in Group IV. The proposed schedule for RFI field activities indicates the Group IV investigation will follow the Group I investigation. The proposed soil boring/sampling and monitoring well installation/sampling is expected to last approximately one week.

**SWMU #4:** The proposed investigative activities for SWMU #4 include surface soil sampling and sediment sampling. Completion of the scope of work is expected to take approximately two days.

**SWMU #5:** Boring and monitoring well installation at SWMU #5 will follow the investigative activities at SWMU #4. The proposed field work should take approximately one week to complete.

**SWMU #6:** SWMU #36 will be the final SWMU investigated in Group IV. Field work is anticipated to last one day.

#### **GROUP V**

Group V consists of SWMUs #13, #27, #28, #30, #31, #32, and #33. The level of effort for the investigations proposed at these SWMUs will be equivalent to a Confirmatory Site Inspection

(CSI). The sampling objectives for these SWMUs will be to determine if releases have occurred and to determine if a full RFI characterization is warranted. The SWMUs will be investigated in the order listed above with field activities commencing following completion of Group II.

#### **4.2 Phase II**

It is assumed that several of the SWMUs will need a Phase II investigation including installation of additional monitoring wells, sampling and analysis. The Phase II Investigation will be initiated immediately after all results from the Phase I are received and after communicating with EPA. A period of approximately 60 working days will be necessary to complete Phase II.

#### **5.0 SCHEDULING OF RFI REPORTS**

Quarterly progress reports will be sent to EPA and SCDHEC beginning 90 days from the date of RFI Work Plan approval. Phase II field activities will be implemented with the intention of addressing all data gaps identified during Phase I. Therefore, additional communication with EPA and SCDHEC will occur as necessary in the form of technical memorandums to keep the agencies informed of Phase I results and proposed Phase II field activities.

Writing of full contamination assessment reports will begin at the end of Phase II field activities. Individual reports will be submitted for each of the SWMU groups. Draft report submittals will be staggered in a manner that will allow NSY a 20 day review period for each group report prior to receiving the next report. The RFI Reports will be submitted in the same order in which the groups were investigated.

#### **6.0 GROUNDWATER MONITORING**

In view of the number of existing SWMU's and associated monitoring wells across NSY, a comprehensive groundwater monitoring program should be implemented for the entire facility. All existing monitoring wells can be placed on a facility base map. The map can then be used to display a variety of well gauging and analytical data. Ultimately, the program will allow

comparison of analytical and hydrogeological data across the entire facility. The program will consist of the following two major components:

### **6.1 Surveying and Gauging Of All NSY Monitoring Wells.**

Because of the large number of wells to be installed, surveying of these wells was split into two periods with one week of surveying occurring approximately halfway through field activities. The remaining wells will be surveyed at the end of field activities.

A list of all existing monitoring wells will be compiled. The list will include well ID number, date of installation, well depth, depth to water, surveyed coordinates, vertical elevation of well casing, and types and concentrations of constituents (if any) detected by analysis of groundwater samples. The wells will be accurately located on a base map of the facility. Monitoring wells installed in support of the RFI will be incorporated into the list and identified on the base map. Water levels in all NSY monitoring wells should be periodically gauged to determine the overall pattern of groundwater flow rate and direction across the facility. Well gauging data combined with analytical results from the RFI should provide a comprehensive illustration of groundwater conditions at NSY.

### **6.2 Surveying all public and private wells**

A survey of groundwater users within a 7-mile radius of the NSY was provided by the South Carolina Water Resources Commission to ascertain the extent, if any, of shallow groundwater usage in the vicinity of the NSY. The survey indicated there are no wells screened in the surficial aquifer being utilized as a source for drinking water within a 4-mile radius of the NSY. Currently, there is no evidence of shallow groundwater usage at the NSY.

<b>Charleston Naval Shipyard RCRA Facility Investigation Facility Submission Schedule</b>	
<b>Submission Requirements</b>	<b>Due Date</b>
Draft Final RFI Work Plan	Submitted 17 August 1992
Final RFI Work Plan	30 Days From Receipt of EPA Comments
Implement RFI Work Plan	45 Days From EPA Final Work Plan Approval
Quarterly Progress Reports	Beginning 90 Days From Final Work Plan Approval
Group I Draft Final RFI Report	277 Days From RFI Work Plan Implementation
Group I Final RFI Report	20 Days From Receipt of EPA Comments on Draft Final
Group II Draft Final RFI Report	20 Days From Submittal of Group I Draft Final RFI Report
Group II Final RFI Report	20 Days From Receipt of EPA Comments on Draft Final
Group III Draft Final RFI Report	20 Days From Submittal of Group II Draft Final RFI Report
Group III Final RFI Report	20 Days From Receipt of EPA Comments on Draft Final
Group IV Draft Final RFI Report	20 Days From Submittal of Group III Draft Final RFI Report
Group IV Final RFI Report	20 Days From Receipt of EPA Comments on Draft Final
Group V Draft Final RFI Report	20 Days From Submittal of Group IV Draft Final RFI Report
Group V Final RFI Report	20 Days From Receipt of EPA Comments on Draft Final

Note: Implementation of the proposed schedule is contingent upon the availability of funds. All schedule days represent business days.

Schedule Name : CHARLSTON NAVAL SHIPYARD  
 Responsible : PAUL STODDARD  
 As-of Date : 2-Jan-92

Schedule File : CNSY-RFI

RCRA FACILITY INVESTIGATION

Task Name	Start Date	End Date	Duration
COMMUNITY RELATIONS	2-Jan-92	30-Jan-92	20.0 days
COMM. REL. MTG.	2-Jan-92	3-Jan-92	2.0 days
COMMUNITY INTERVIEWS	2-Jan-92	23-Jan-92	15.0 days
DRAFT CRP	2-Jan-92	30-Jan-92	20.0 days
SOUTHDIV REVIEW/COMMENT	2-Jan-92	23-Jan-92	15.0 days
DRAFT-FINAL CRP	2-Jan-92	23-Jan-92	15.0 days
EPA REVIEW/COMMENT	2-Jan-92	30-Jan-92	20.0 days
FINAL CRP	2-Jan-92	23-Jan-92	15.0 days
RFI WORK PLAN	11-Jun-92	5-Nov-92	103.0 days
DRAFT-FINAL RFI WORK PL	11-Jun-92	18-Aug-92	48.0 days
EPA REVIEW/COMMENTS	19-Aug-92	30-Sep-92	30.0 days
FINAL RFI WORK PLAN	1-Oct-92	22-Oct-92	15.0 days
WORK PLAN APPROVAL BY E	23-Oct-92	5-Nov-92	10.0 days
MGT OF SUBCONTRACTORS	6-Nov-92	28-Dec-92	30.0 days
RFI FIELD WORK	2-Jan-92	26-Feb-93	286.0 days
MOBE	15-Jan-93	22-Jan-93	5.0 days
GRP-1	2-Jan-92	26-Feb-93	286.0 days
SWMU-1	25-Jan-93	9-Feb-93	12.0 days
SWMU-2	10-Feb-93	26-Feb-93	12.0 days
SWMU-21	2-Jan-92	3-Jan-92	2.0 days
SWMU-22	2-Jan-92	3-Jan-92	2.0 days
SWMU-25	2-Jan-92	3-Jan-92	2.0 days
GRP-2	2-Jan-92	2-Jan-92	0.0
SWMU-8	2-Jan-92	2-Jan-92	0.0
SWMU-9	2-Jan-92	2-Jan-92	0.0
SWMU-20	2-Jan-92	2-Jan-92	0.0
SWMU-29	2-Jan-92	2-Jan-92	0.0
SWMU-34	2-Jan-92	2-Jan-92	0.0
SWMU-35	2-Jan-92	2-Jan-92	0.0
GRP-3	2-Jan-92	2-Jan-92	0.0
SWMU-6	2-Jan-92	2-Jan-92	0.0
SWMU-7	2-Jan-92	2-Jan-92	0.0
SWMU-12	2-Jan-92	2-Jan-92	0.0
SWMU-14	2-Jan-92	2-Jan-92	0.0
SWMU-17	2-Jan-92	2-Jan-92	0.0
GRP-4	2-Jan-92	2-Jan-92	0.0
SWMU-3	2-Jan-92	2-Jan-92	0.0
SWMU-4	2-Jan-92	2-Jan-92	0.0
SWMU-5	2-Jan-92	2-Jan-92	0.0
SWMU-36	2-Jan-92	2-Jan-92	0.0
GRP-5	2-Jan-92	2-Jan-92	0.0
SWMU-13	2-Jan-92	2-Jan-92	0.0
SWMU-27	2-Jan-92	2-Jan-92	0.0
SWMU-28	2-Jan-92	2-Jan-92	0.0
SWMU-30	2-Jan-92	2-Jan-92	0.0
SWMU-31	2-Jan-92	2-Jan-92	0.0

Task Name	Start Date	End Date	Duration
SWMU-32	2-Jan-92	2-Jan-92	0.0
SWMU-33	2-Jan-92	2-Jan-92	0.0
RFI REPORTS	2-Jan-92	11-Mar-92	48.0 days
GRP-1	2-Jan-92	11-Mar-92	48.0 days
DRAFT RFI REPORT	2-Jan-92	11-Mar-92	48.0 days
SOUTHDIR REVIEW/COMME	2-Jan-92	11-Mar-92	48.0 days
DRAFT-FINAL RFI REPOR	2-Jan-92	11-Mar-92	48.0 days
EPA REVIEW COMMENTS	2-Jan-92	11-Mar-92	48.0 days
FINAL RFI REPORT	2-Jan-92	11-Mar-92	48.0 days
GRP-2	2-Jan-92	11-Mar-92	48.0 days
DRAFT RFI REPORT	2-Jan-92	11-Mar-92	48.0 days
SOUTHDIR REVIEW/COMME	2-Jan-92	11-Mar-92	48.0 days
DRAFT-FINAL RFI REPOR	2-Jan-92	11-Mar-92	48.0 days
EPA REVIEW/COMMENT	2-Jan-92	11-Mar-92	48.0 days
FINAL RFI REPORT	2-Jan-92	11-Mar-92	48.0 days
GRP-3	2-Jan-92	11-Mar-92	48.0 days
DRAFT RFI REPORT	2-Jan-92	11-Mar-92	48.0 days
SOUTHDIR REVIEW/COMME	2-Jan-92	11-Mar-92	48.0 days
DRAFT-FINAL RFI REPOR	2-Jan-92	11-Mar-92	48.0 days
EPA REVIEW/COMMENT	2-Jan-92	11-Mar-92	48.0 days
FINAL RFI REPORT	2-Jan-92	11-Mar-92	48.0 days
GRP-4	2-Jan-92	11-Mar-92	48.0 days
DRAFT RFI REPORT	2-Jan-92	11-Mar-92	48.0 days
SOUTHDIR REVIEW/COMME	2-Jan-92	11-Mar-92	48.0 days
DRAFT-FINAL RFI REPOR	2-Jan-92	11-Mar-92	48.0 days
EPA REVIEW/COMMENT	2-Jan-92	11-Mar-92	48.0 days
FINAL RFI REPORT	2-Jan-92	11-Mar-92	48.0 days
GRP-5	2-Jan-92	11-Mar-92	48.0 days
DRAFT RFI REPORT	2-Jan-92	11-Mar-92	48.0 days
SOUTHDIR REVIEW/COMME	2-Jan-92	11-Mar-92	48.0 days
DRAFT-FINAL RFI REPOR	2-Jan-92	11-Mar-92	48.0 days
EPA REVIEW/COMMENT	2-Jan-92	11-Mar-92	48.0 days
FINAL RFI REPORT	2-Jan-92	11-Mar-92	48.0 days