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CORRECTIVE ACTION MANAGEMENT PLAN NS MAYPORT FL
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ABB ENVIRONMENTAL SERVICES

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CORRECTIVE ACTION MANAGEMENT PLAN

NAVAL STATION MAYPORT MAYPORT, FLORIDA

Unit Identification Code: N60201

Contract No. N62467-89-D-0317/028

Prepared by:

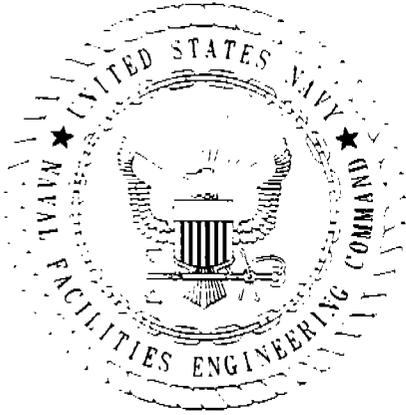
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March 1995

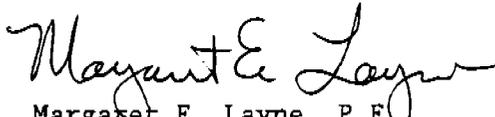


CERTIFICATION OF TECHNICAL
DATA CONFORMITY (MAY 1987)

The Contractor, ABB Environmental Services, Inc., hereby certifies that, to the best of its knowledge and belief, the technical data delivered herewith under Contract No. N62467-89-D-0317/076 are complete and accurate and comply with all requirements of this contract.

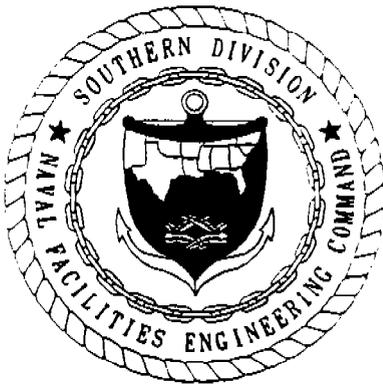
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FOREWORD

To meet its mission objectives, the U.S. Navy performs a variety of operations, some requiring the use, handling, storage, or disposal of hazardous materials. Through accidental spills and leaks and conventional methods of past disposal, hazardous materials may have entered the environment in ways unacceptable by today's standards. With growing knowledge of the long-term effects of hazardous materials on the environment, the Department of Defense (DOD) initiated various programs to investigate and remediate conditions related to suspected past releases of hazardous materials at their facilities. The U.S. Navy's program is called the Navy Installation Restoration Program (NIRP, which was previously called the Navy Assessment and Control of Installation Pollutants [NACIP] prior to 1987).

The Resource Conservation and Recovery Act (RCRA) addresses present hazardous material management. RCRA ensures that solid and hazardous wastes are managed in an environmentally sound manner. The law applies primarily to facilities that generate or handle hazardous waste. The RCRA corrective action program is designed to identify and clean up releases of hazardous substances at RCRA-permitted facilities.

The RCRA corrective action program is conducted in three stages.

- The RCRA Facility Assessment (RFA) identifies solid waste management units (SWMUs), evaluates the potential for releases of contaminants, and determines the need for future investigations.
- The RCRA Facility Investigation (RFI) then determines the nature, extent, and fate of contaminant releases.
- The Corrective Measures Study (CMS) identifies and recommends measures to correct the release.

The hazardous waste investigations at Naval Station Mayport are presently being conducted under the RCRA corrective action program. Earlier investigations were conducted at Naval Station Mayport under the Navy's former NACIP program and NIRP following Superfund guidelines. In 1988, in coordination with the U.S. Environmental Protection Agency (USEPA) and the Florida Department of Environmental Regulation (FDER, which became the Florida Department of Environmental

Protection [FDEP] on July 1, 1993), the hazardous waste investigations were formalized under the RCRA program.

Mayport is conducting investigations and cleanup at the facility by working through the Southern Division, Naval Facilities Engineering Command (SOUTHNAVFAC-ENGGCOM). The USEPA and the FDEP oversee the Navy environmental program at Mayport. All aspects of the program are conducted in compliance with State and Federal regulations, as ensured by the participation of these regulatory agencies.

Questions regarding the RCRA program at Naval Station Mayport should be addressed to Mr. David Driggers, Code 1852, at (803) 743-0501.

EXECUTIVE SUMMARY

ABB Environmental Services, Inc. (ABB-ES), under the Comprehensive Long-term Environmental Action, Navy (CLEAN) Contract, No. N62467-89-D-0317, is conducting a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) on behalf of the U.S. Navy at the Naval Station (NAVSTA) Mayport. This investigation is being conducted in accordance with the Hazardous and Solid Waste Amendments (HSWA) of 1984 permit No. FL9-170-024-260, issued by the U.S. Environmental Protection Agency (USEPA) on March 25, 1988, and revised and renewed on June 15, 1993. This document presents the Corrective Action Management Plan (CAMP). The purpose of the CAMP is to update the NAVSTA Mayport corrective action program strategy and schedule in compliance with the HSWA regulations. The CAMP also prioritizes the solid waste management units (SWMUs) and areas of concern (AOCs) listed in the HSWA permit. Appendix A of this document contains anticipated sequences and durations of the major tasks for the NAVSTA Mayport corrective action program.

NAVSTA Mayport is located in Jacksonville, Florida, in northeastern Duval County on the south shore of the confluence of the St. Johns River and the Atlantic Ocean. An RCRA Facility Assessment and Visual Site Inspection (RFA/VSI) for NAVSTA Mayport was conducted by the USEPA Region IV in 1989 (A.T. Kearney, 1989). The RFA/VSI identified 56 SWMUs and 2 AOCs at NAVSTA Mayport. Fifteen of these SWMUs were determined to require no further action. Twenty-three of the remaining SWMUs were determined to require further investigation by conducting RCRA Facility Assessment and Sampling Visits (RFA/SVs) referred to in the current HSWA permit as confirmatory sampling. The remaining 18 SWMUs were determined to require an RFI.

Due to the number of SWMUs, the diversity of their past and/or present operations, and the magnitude of the permit requirements, the USEPA recommended that a phased approach be used to implement the RFI and other corrective action activities at NAVSTA Mayport. This CAMP was included as Appendix F in the RFI workplan (ABB-ES, 1991) and was prepared to describe the strategy to implement the RCRA corrective action program at NAVSTA Mayport. This document has been revised in response to new language in the revised HSWA permit.

The purpose of the NAVSTA Mayport CAMP is to outline the strategy for conducting assessments to confirm and characterize the nature and extent of suspected releases of hazardous substances to the environment at NAVSTA Mayport. The assessments consist of RFIs to characterize the nature and extent of confirmed contamination and confirmatory sampling (RFA/SVs) to confirm the presence of suspected contamination in accordance with the requirements of HSWA permit No. FL9-170-024-260.

The corrective action program at NAVSTA Mayport has been structured to permit a phased approach to assure collection of adequate site characterization data to support the selection of effective corrective measures. The structure of the corrective action program at NAVSTA Mayport is based on the establishment of four SWMU groups. The Corrective Action activities at each group of SWMUs will be implemented in phases. Corrective action investigations during the phases will be composed of multiple investigative rounds to achieve confirmatory sampling or site characterization at each SWMU. The following definitions are used in this CAMP.

- An SWMU group is a group of SWMUs and AOCs that are geographically close to each other with common characteristics making implementation of corrective actions more efficient and effective collectively as a group. Four SWMU groups are defined for NAVSTA Mayport: Group I, Group II, Group III, and Group IV. These SWMU groups are described in Chapter 3.0 of the CAMP.
- A corrective action phase is the entire scope of corrective action activities implemented at an SWMU group over a period of time. Corrective action activities at an SWMU group can include confirmatory sampling, RFIs, interim measures, and corrective measures. Phases are defined in permit implementation of corrective action activities at an SWMU group independently of other SWMU groups for flexibility and to prioritize efforts by addressing relatively high risk SWMUs early in the corrective action program. Four corrective action phases are planned: Phase 1 at SWMU Group I, Phase 2 at SWMU Group II, Phase 3 at SWMU Group III, and Phase 4 at SWMU Group IV.
- An investigative round is a sampling and data gathering event that occurs during investigative activities as part of a corrective action phase at an SWMU group. For example, an investigative round will be conducted as an RFA/SV at SWMUs requiring confirmatory sampling. SWMUs in a group that require an RFI in accordance with the HSWA permit or are determined to require an RFI during confirmatory sampling will have investigative rounds of sampling and data gathering to characterize the lateral and vertical extent of contamination. The scope of RFIs will be broad enough to address known data gaps; however, new data often brings to light new questions that must be answered. RFIs may, therefore, require multiple investigative rounds of sampling to assure that significant data gaps are adequately addressed.

The Group I SWMUs are located in the southwest part of NAVSTA Mayport and include former landfills, active dredge material disposal areas, and other individual SWMUs. These SWMUs were incorporated in Group I because of their: (1) proximity to each other, (2) common drainage to the Sherman Creek watershed, (3) similarity of past waste disposal activities, and (4) the potential for similar or related corrective measures. RFI and confirmatory sampling (RFA/SV) assessment activities have been implemented for Group I SWMUs. The results of the first round of sampling at Group I RFI SWMUs are included in Volumes I and II of the Phase I RCRA Facility Investigation report dated November 1992 (ABB-ES, 1992b). The results of confirmatory sampling at Group I RFA/SV SWMUs are included in the RFA/SV report (final draft) dated November 1992 (ABB-ES, 1992c).

The Group II SWMUs are located along the northern part of NAVSTA Mayport contiguous with the St. Johns River and include former hazardous and solid waste storage areas, petroleum waste treatment and disposal, and wastewater treatment facilities. The SWMUs were incorporated into Group II because of their: (1) proximity to each other, (2) nearness to the St. Johns River, and (3) potential for similar or related corrective measures. Group II SWMUs were ranked as Priority 2 because of a "moderate perceived risk" for contaminants to be of moderate areal extent and to affect moderate volumes of soil and groundwater, and moderate potential for adverse impacts to ecological receptors by soil and groundwater. RFI and confirmatory sampling assessment activities have been implemented for Group II SWMUs.

The Group III SWMUs are located in the eastern part of NAVSTA Mayport adjacent to the turning basin and include isolated areas with contamination confined to localized areas. The SWMUs were incorporated into Group III because of their: (1) proximity to the turning basin, the St. Johns River, and the Atlantic Ocean; (2) similarity of surrounding land use; and (3) potential for similar or related corrective measures. Group III SWMUs were ranked as Priority 3 because of a "low perceived risk" because contaminants are of localized areal extent and affect small volumes of soil and groundwater. In addition, some of the SWMUs in Group III are being addressed by other environmental management, regulatory, and maintenance programs, which will provide data to assist in determining appropriate RCRA investigative actions. RFI and confirmatory sampling (RFA/SV) assessment activities for Group III SWMUs are scheduled for 1995.

The Group IV SWMUs and AOCs are composed of utility networks and system components that span multiple geographic areas at NAVSTA Mayport. None of the SWMUs in Group IV are required in the HSWA permit to have an RFI conducted, but are to have confirmatory sampling (RFA/SV) to assess whether an RFI would be required. Group IV SWMUs were formed because of similarity of investigation and corrective measures that may be required for utilities networked throughout NAVSTA Mayport. In addition, some of the SWMUs in Group IV are being addressed by other environmental management, regulatory, and maintenance programs, which will provide data to assist in determining appropriate RCRA investigative actions. RFA/SV assessment activities have not been implemented for Group IV SWMUs.

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NAVSTA Mayport
Mayport, Florida

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GLOSSARY

ABB-ES	ABB Environmental Services, Inc.
AOCs	areas of concern
CAMP	Corrective Action Management Plan
CFR	Code of Federal Regulations
CLEAN	Comprehensive Long-term Environmental Action, Navy
CMS	Corrective Measures Study
DRMO	Defense Reutilization and Marketing Office
ESI	Expanded Site Inspection
FAC	Florida Administrative Code
FDEP	Florida Department of Environmental Protection
FDER	Florida Department of Environmental Regulation
HW	hazardous waste
HSWA	Hazardous and Solid Waste Amendments
IAS	Initial Assessment Study
IR	Installation Restoration
JSI	Jacksonville Ship Yard Inc.
NACIP	Naval Assessment and Control of Installation Pollutants
NADEP	Naval Aviation Depot
NAVSTA	Naval Station
NFI	North Florida Ship Yard Inc.
NIRP	Naval Installation Restoration Program
NOTI	Notice of Technical Inadequacy
NPDES	National Pollutant Discharge Elimination System
OWTP	Oily Waste Treatment Plant
PCBs	polychlorinated biphenyls
PWD	Public Works Department
QA/QC	quality assurance and quality control
RAB	Restoration Advisory Board
RCRA	Resource Conservation and Recovery Act
RFA	RCRA Facility Assessment
RFA/SV	RCRA Facility Assessment and Sampling Visit (confirmatory sampling)
RFA/VSII	RCRA Facility Assessment and Visual Site Inspection
RFI	RCRA Facility Investigation
RPM	Remedial Project Management
SIMA	Ships Intermediate Maintenance Area
SOUTHNAV- FACENCOM	Southern Division, Naval Facilities Engineering Command

GLOSSARY (Continued)

TRC Technical Review Committee

USEPA U.S. Environmental Protection Agency
USTs underground storage tanks

1.0 INTRODUCTION

ABB Environmental Services, Inc. (ABB-ES), under the Comprehensive Long-term Environmental Action, Navy (CLEAN) Contract No. N62467-89-D-0317, is conducting a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) on behalf of the U.S. Navy at the Naval Station (NAVSTA) Mayport. This document presents the Corrective Action Management Plan (CAMP) for NAVSTA Mayport. The CAMP presents the schedule for planning and implementing the Corrective Action Program as required by the Hazardous and Solid Waste Amendment (HSWA) of 1984 part of the RCRA Permit Number FL9-170-024-260 for NAVSTA Mayport, Florida. The HSWA part of the permit was issued by Region IV of the U.S. Environmental Protection Agency (USEPA) on March 25, 1988, and was revised and renewed on June 15, 1993. The current HSWA permit has an expiration date of June 15, 2003.

When approved by the Region IV Administrator of the USEPA, the CAMP contains the enforceable schedule of compliance for submittal of workplans and reports. The CAMP also prioritizes the solid waste management units (SWMUs) and areas of concern (AOCs) listed in the HSWA permit (USEPA, 1993; Appendix A).

The schedule presented in Appendix A contains the anticipated sequences and durations of the major tasks for the NAVSTA Mayport Corrective Action Program that are required to comply with the HSWA permit. Actual milestone dates may vary depending on unanticipated site conditions, investigative findings, and regulatory requirements. Workplans, which are required by the HSWA permit to accomplish the corrective action program, will also contain operational schedules that may modify and update milestones presented in the current CAMP schedule. Revisions to the current schedule in the CAMP will be made in accordance with Section II.I. and II.K.2. of the HSWA permit. Revisions to the CAMP are subject to approval by the USEPA Region IV Administrator.

The corrective action program at NAVSTA Mayport has been structured to permit a phased approach to assure collection of adequate site characterization data to support the selection of effective corrective measures. The structure of the corrective action program at NAVSTA Mayport is based on the establishment of four SWMU groups. The corrective action activities at each group of SWMUs will be implemented in phases. Corrective action investigations during the phases will be composed of multiple investigative rounds to achieve confirmatory sampling or site characterization at each SWMU. The following definitions are used in this CAMP.

- An SWMU group is a group of SWMUs and AOCs that are geographically close to each other with common characteristics making implementation of corrective actions more efficient and effective collectively as a group. Four SWMU groups are defined for NAVSTA Mayport: Group I, Group II, Group III, and Group IV. These SWMU groups are described in Chapter 3.0 of the CAMP.
- A corrective action phase is the entire scope of corrective action activities implemented at an SWMU group over a period of time. Corrective action activities at an SWMU group can include confirmatory sampling, RFI, interim measures, and corrective measures. Phases are defined in order to permit implementation of corrective action activities at an SWMU group independently of other SWMU groups for flexibility and to prioritize

2.0 OBJECTIVES

The goal of the NAVSTA Mayport corrective action program is to comply with the HSWA permit by effectively assessing the presence and concentration of suspected or known releases of hazardous waste or hazardous constituents from SWMUs to determine corrective measures to prevent adverse effects to human health and the environment. The following objectives support attainment of this goal:

- measure background contaminants and their concentrations to ensure the adequacy of investigative data and to appropriately identify contaminants of concern such as hazardous wastes or hazardous constituents that potentially emanate from SWMUs,
- conduct confirmatory sampling at SWMUs with suspected releases of hazardous wastes or hazardous constituents to the environment,
- characterize the lateral and vertical extent of hazardous waste or hazardous constituents that have been released from an SWMU,
- estimate risks to human health and the environment posed by the characterized extent of hazardous waste or hazardous constituents released from SWMUs,
- implement interim measures where necessary to mitigate potential risks posed by known releases of hazardous waste or hazardous constituents from SWMUs,
- conduct corrective measures studies at SWMUs determined to require corrective measures to reduce adverse risks posed by the hazardous waste or hazardous constituents, and
- implement corrective measures approved by USEPA and Florida Department of Environmental Protection (FDEP).

To achieve these objectives, the CAMP provides the strategy and schedule to implement the corrective action program.

3.0 BACKGROUND

HSWA Permit History. Table 3-1 provides a chronology of the RCRA investigations and related activities conducted at NAVSTA Mayport up to the present HSWA permit. An HSWA permit (number FL9-170-024-260) was issued by the USEPA Region IV Administrator to NAVSTA Mayport on March 25, 1988, with an expiration date of March 25, 1993 (USEPA, 1988). This HSWA permit combined with the State of Florida hazardous waste storage permit (number H016-118598 issued on March 5, 1988) constituted a full RCRA permit. The HSWA permit identified 17 SWMUs that required corrective actions for known releases of hazardous wastes or hazardous constituents to the environment.

A RCRA Facility Assessment and Visual Site Inspection (RFA/VSI) for NAVSTA Mayport was conducted by Region IV USEPA between June 26 and 29, 1989 (A.T. Kearny, 1989). The RFA/VSI identified 56 SWMUs and 2 AOCs at the NAVSTA Mayport facility. Fifteen of these SWMUs were determined not to require further action. Twenty-three of the remaining SWMUs were determined to require further investigation (confirmatory sampling). The remaining 18 SWMUs were determined to require an RFI.

Of these 18 SWMUs, 17 had been previously identified in the HSWA permit. The additional SWMU, Building 1600 Blasting Area, was identified during the RFA/VSI by the USEPA and determined to require an RFI. The Navy prepared a final draft RFI workplan (C.E. Environmental, 1989) in response to the HSWA permit requirements addressing the 17 permitted SWMUs. The final draft RFI workplan was reviewed by applicable regulatory agencies and their comments were received by the Navy on May 6, 1991 (USEPA, 1991a). The USEPA reported in their comments on the final draft RFI workplan that they would address the remaining 39 SWMUs identified during the RFA/VSI under revised permit conditions at a later date. The final draft RFI workplan was revised in response to regulatory comments, the Building 1600 Blasting Area was added to the RFI, and a CAMP was included. The RFI CAMP provided the initial strategy for corrective action implementation and prioritization of SWMUs. The CAMP also included a schedule for implementation of corrective action tasks. The final RFI workplan and CAMP were approved by the USEPA on October 24, 1991 (USEPA, 1991c).

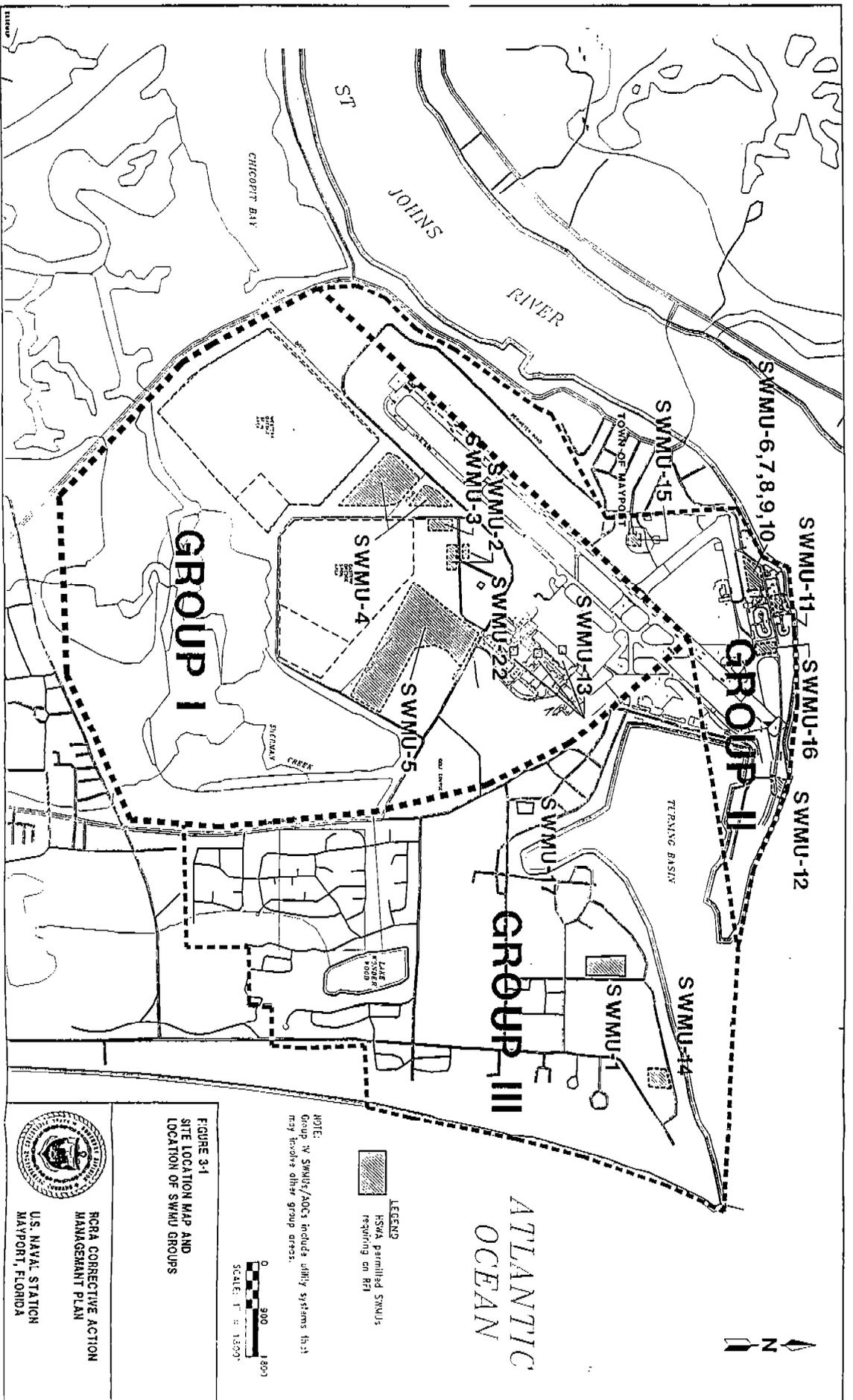
The CAMP contained in the final RFI workplan grouped the 56 SWMUs into four groups (Figure 3-1). Three of these groups were defined geographically by the proximity of the SWMUs to each other and to site features such as wetlands, rivers, and land use patterns. The fourth group contains SWMUs and AOCs associated with utility networks and appurtenances located within multiple SWMU groups and are being actively managed under other State or Federal environmental programs for underground storage tanks (UST) (e.g., Chapters 62-761 and 62-770, Florida Administrative Code [FAC], and others) or National Pollutant Discharge Elimination System (NPDES) permits (point source and stormwater discharges). The RFI CAMP also prioritized the SWMUs according to the perceived relative risks posed by the SWMUs based on the existing knowledge of the sites and their past releases. The highest priority group of SWMUs was Group I. The Groups II, III, and IV were assigned sequentially lower priorities.

HSWA permit FL9-170-024-260 was revised and renewed on June 15, 1993 (USEPA, 1993). This CAMP is a revision of the CAMP approved by USEPA on October 24, 1991, and reflects changes made in response to the revised HSWA permit.

Table 3-1 (Continued)
Naval Station (NAVSTA) Mayport Resource Conservation and Recovery Act (RCRA)
Corrective Action Program Chronology

Corrective Action Management Plan
NAVSTA Mayport
Mayport, Florida

Date	Event
1-Dec-93	Draft RFI workplan Addendum 4. supplemental sampling at Groups I and II submitted for regulatory review
09-May-94	Begin field investigation for supplementary sampling at Groups I and II SWMUs
21-Apr-94	Final technical memorandum. background characterization activities. submitted for approval
13-May-94	Draft interim measures workplan. SWMU 19. Naval Aviation Depot (NADEP) Blasting Area. submitted for review
13-May-94	Draft interim measures workplan. SWMU 2. Polychlorinated Biphenyl Area. submitted for review
16-May-94	Draft RFA/SV workplan. Group III SWMUs 20, 21, 29, 46, and 52. submitted for approval
20-May-94	Draft interim measures workplan. SWMU 6 and 7. Sludge Drying Beds Area. submitted for review
01-Jun-94	Draft RFI workplan Addendum 5. Group III SWMUs. submitted for approval
02-Jun-94	TRC meeting for Mayport corrective action program
08-Aug-94	Final draft Clean Closure Equivalency Demonstration Petition. SWMU 12. submitted for approval
26-Oct-94	End field investigation for supplementary sampling at Groups I and II SWMUs
15-Nov-94	Final RFI workplan Addendum 5. Group III SWMUs. submitted for approval
15-Nov-94	Final RFA/SV workplan. Group III SWMUs 20, 21, 29, 46, and 52. submitted for approval
22-Dec-94	Draft Corrective Measures Study workplan submitted for review
03-Feb-95	Draft RFI General Information report submitted for review
10-Feb-95	Final Corrective Measures Study workplan submitted for approval



GROUP I

GROUP II

GROUP III

LEGEND
 Hatched area: SWMU's requiring RCRA corrective action

NOTE:
 Group IV SWMU's/AGCs include utility systems that may include other group areas.



FIGURE 3-1
SITE LOCATION MAP AND
LOCATION OF SWMU GROUPS

RCRA CORRECTIVE ACTION
MANAGEMENT PLAN
U.S. NAVAL STATION
MAYPORT, FLORIDA



The initial CAMP included a schedule for implementing the corrective action program. The general outline of the schedule addressed each group of SWMUs sequentially, initiating RFI and confirmatory sampling activities at the Group I through Group IV SWMUs. The groupings and prioritization of the 56 SWMUs are generally maintained in this CAMP, except as modified due to new information gathered since the original CAMP was prepared and to comply with new conditions enjoined by the current HSWA permit. A revised schedule for implementation of the corrective action program is presented in this CAMP to comply with the revised conditions defined in the current HSWA permit.

SWMU and AOC Summary and Status. Appendix A of the HSWA permit presents the permitted SWMUs (USEPA, 1993). The 56 SWMUs and 2 AOCs are placed into three categories:

- SWMUs and AOCs requiring no further action at this time,
- SWMUs and AOCs requiring confirmatory sampling, and
- SWMUs and AOCs requiring an RFI.

Table 3-2 provides a summary of the 56 SWMUs addressed by the HSWA permit and a brief description.

Four SWMU Groups were defined in the initial NAVSTA Mayport RCRA CAMP (ABB-ES, 1991; Appendix F). The grouping of SWMUs is used in this CAMP to maintain consistency and to comply with the current HSWA permit. SWMU Groups I through III were defined by the geographic proximity of individual SWMUs and the commonality of past waste management practices and corrective measures (Figure 3-1). SWMUs and AOCs in Group IV, such as utility networks, are not directly associated with a given geographic area and span multiple groups of SWMUs.

The Group I SWMUs are located in the southwest part of NAVSTA Mayport and include former landfills, active dredge material disposal areas, and other individual SWMUs. These SWMUs were incorporated in Group I because of their: (1) proximity to each other, (2) common drainage to the Sherman Creek watershed, (3) similarity of past waste disposal activities, and (4) the potential for similar or related corrective measures. RFI and confirmatory sampling (RFA/SV) assessment activities have been implemented for Group I SWMUs. The results of the first round of sampling at Group I RFI SWMUs are included in Volumes I and II of the Phase I RFI report dated November 1992 (ABB-ES, 1992b). The results of confirmatory sampling at Group I RFA/SV SWMUs are included in the RFA/SV report (final draft) dated November 1992 (ABB-ES, 1992c). Additional investigations were performed at Group I SWMUs in 1994, as described in the RFA/SV workplan Addendum 1 (ABB-ES, 1993a) and the RFI workplan Addendum 4 (ABB-ES, 1993b). The schedule for report submittals is presented in Appendix B.

The Group II SWMUs are located along the northern part of NAVSTA Mayport contiguous with the St. Johns River and include former hazardous and solid waste storage areas, petroleum waste treatment and disposal operations, and wastewater treatment facilities. The SWMUs were incorporated into Group II because of their: (1) proximity to each other, (2) nearness to the St. Johns River, and (3) potential for similar or related corrective measures. RFI and confirmatory sampling activities were implemented at Group II SWMUs in 1993 and 1994, as described in the RFA/SV Workplan, Group II SWMUs (ABB-ES, 1993c) and the RFI workplan Addendum 4 (ABB-ES, 1993b). The schedule for report submittals is presented in Appendix B.

**Table 3-2
Solid Waste Management Unit (SWMU) and Area of Concern (AOC) Summary**

Corrective Action Management Plan
NAVSTA Mayport
Mayport, Florida

Group	RFI or RFA/SV	SWMU	NIRP	Description
I	RFI	02	02	Landfill B
I	RFI	03	04	Landfill D
I	RFI	04	05	Landfill E
I	RFI	05	06	Landfill F
I	RFI	13	13	Old Fire Training Area
I	RFI	22	NA	Building 1600 Blasting Area
I	RFA/SV	26	03	Landfill C
I	RFA/SV	49	NA	Flight Line Retention Ponds
I	RFA/SV	50	NA	Dredge Spoil Disposal Area
I	RFA/SV	56	NA	Building 1552 Accumulation Area
II	RFI	06	08	Waste Oil Pit
II	RFI	07	8A	OWTP Sludge Beds
II	RFI	08	8B	OWTP Percolation Pond
II	RFI	09	8C	OWTP
II	RFI	10	8D	RCRA Hazardous Waste Storage Area
II	RFI	11	09	Fuel Spill Area
II	RFI	12	11	Neutralization Basin
II	RFI	15	15	Old Pesticide Handling Area
II	RFI	16	16	Old Transformer Storage Yard
II	RFA/SV	19	NA	NADEP Blasting Area
II	RFA/SV	28	10	DRMO Yard
II	RFA/SV	48	NA	Former Chemistry Laboratory
II	RFA/SV	51	NA	Waste Oil Tanks
III	RFI	01	01	Landfill A
III	RFI	14	14	Mercury and Oily Waste Spill Area
III	RFI	17	17	Carbonaceous Fuel Boiler
III	RFA/SV	18	NA	FTC Diesel Generator Sump
III	RFA/SV	20	NA	Hobby Shop Drain
III	RFA/SV	21	NA	Hobby Shop Scrap Storage Area
III	RFA/SV	23	NA	Jacksonville Ship Yard, Inc., (JSI) Area

See notes at end of table.

Table 3-2 (Continued)
Solid Waste Management Unit (SWMU) and Area of Concern (AOC) Summary

Corrective Action Management Plan
NAVSTA Mayport
Mayport, Florida

Group	RFI or RFA/SV	SWMU	NIRP	Description
III	RFA\SV	24	NA	North Florida Ship Yard, Inc. (NFI) Area
III	RFA/SV	25	NA	Atlantic Marine, Inc. (AMI), Area
III	RFA/SV	29	12	Oily Waste Pipe Line Break
III	RFA/SV	44	NA	Wastewater Treatment Facility Clarifiers 1 and 2
III	RFA/SV	45	NA	Wastewater Treatment Facility Sludge Drying Beds
III	RFA/SV	46	NA	Ships Intermediate Maintenance Area (SIMA) Engine Drain Sump
III	RFA/SV	52	NA	Public Works Department (PWD) Service Station Storage Area
IV	RFA/SV	47	NA	Oily Waste Collection System
IV	RFA/SV	53	NA	Sewer Pipeline
IV	RFA/SV	54	NA	Oil-Water Separators
IV	RFA/SV	55	NA	Storm Sewer and Drainage Pipes
IV	RFA/SV	AOC-A	NA	Fuel Distribution Systems
IV	RFA/SV	AOC-B	NA	Underground Product Storage Tanks

Notes: RFI = Resource Conservation and Recovery Act (RCRA) Facility Investigation.
RFA/SV = RCRA Facility Assessment and Sampling Visit.
NIRP = Naval Installation Restoration Program.
NA = not applicable.
OWTP = Oily Waste Treatment Plant.
RCRA = Resource Conservation and Recovery Act.
NADEP = Naval Aviation Depot.
DRMO = Defense Reutilization and Marketing Office.
FTC = Fleet Training Center.

The Group III SWMUs are located in the eastern part of NAVSTA Mayport adjacent to the turning basin and include isolated areas with suspected contaminants confined to localized areas. The SWMUs were incorporated into Group III because of their: (1) proximity to the turning basin, the St. Johns River, and the Atlantic Ocean; (2) similarity of surrounding land use; and (3) potential for similar or related corrective measures. RFI and confirmatory sampling (RFA/SV) activities for Group III SWMUs are described in the RFI workplan Addendum 5 (ABB-ES, 1994e) and the RFA/SV workplan, Group III SWMUs (ABB-ES, 1994f) and are scheduled for 1995.

The Group IV SWMUs and AOCs are composed of utility networks and system components that span multiple geographic areas at NAVSTA Mayport. Group IV SWMUs were formed because of similarity of investigative and corrective measures that may be required for utilities networked throughout NAVSTA Mayport. In addition, some of the SWMUs in Group IV are being addressed by other environmental management, regulatory, and maintenance programs that will provide data to assist in determining appropriate RCRA investigative actions. Confirmatory sampling (RFA/SV) activities have not been implemented for Group IV SWMUs. None of the Group IV SWMUs or AOCs require an RFI at this time.

A Corrective Measures Study (CMS) workplan has been prepared describing the approach that will be implemented for CMS activities at NAVSTA Mayport (ABB-ES, 1995b). CMS activities will be implemented for Group I and II SWMUs determined to require a CMS in 1995.

Two reports have been submitted presenting background information relevant to all the SWMUs at NAVSTA Mayport. The Technical Memorandum, Background Characterization Activities (ABB-ES, 1994a) describes the development of the Naval Station and presents the results of sample collection and analyses at locations believed to be unaffected by any of the SWMUs. The RFI General Information Report (ABB-ES, 1995a) updates the information in the Technical Memorandum, Background Characterization Activities, describes natural habitats observed at NAVSTA Mayport, including wetlands, and presents the approach to ecological and human health risk assessment that will be applied for the RFI SWMUs.

4.0 PRIORITIES

The current CAMP maintains the same prioritization of SWMUs described in the earlier CAMP (ABB-ES, 1991; Appendix F). The prioritization of SWMUs was based on a qualitative assessment of the potential relative risks posed by the SWMUs based on existing site knowledge. The qualitative assessment considered the following factors:

- potential types of contaminants,
- potentially affected media and migration pathways,
- potential volume of contaminated media,
- anticipated scope of the corrective action investigations (for example, the type, frequency, and analyses of samples), and
- relationship of SWMUs to other environmental management programs.

The Group I SWMUs are ranked as Priority 1. This group has the "highest" perceived relative risk and was the first phase (Phase 1) of the RFI implemented from January 1992 to April 1992. Group I SWMUs as a unit were perceived to have a variety of possible types of contaminants potentially affecting large areas and volumes of soil and groundwater. Because of the proximity of Group I SWMUs to Sherman Creek, this group potentially impacts sensitive environmental receptors by groundwater, surface water, or soil migration pathways. Initial Phase 1 RFI findings characterized soil, sediment, and groundwater contamination at specific SWMUs (ABB-ES, 1992b). Additional investigations were performed in 1994 to characterize the horizontal and vertical extent of the contamination. Confirmatory sampling conducted during the Phase 1 RFA/SV found sediment and surface water contamination at specific SWMUs. Additional investigations were conducted in 1994 to determine if the contamination is SWMU related and to characterize the horizontal and vertical extent of contamination.

None of the contaminants released from SWMUs in Group I appear to present an immediate hazard to public health. However, SWMU 2 was determined to contain surface soil contaminated by polychlorinated biphenyls (PCBs). Early interim measures have minimized the potential for direct human contact by using institutional controls of fencing and posting. Additional interim measures as described in the draft Interim Measures workplan, SWMU 2 (ABB-ES, 1994c), will be implemented in 1995 to remove PCB-contaminated soil to further reduce the potential for adverse effects to human health or the environment.

The Group II SWMUs are ranked as Priority 2, and have a "moderate" perceived relative risk. This group as a unit was perceived to have a variety of possible types of contaminants potentially affecting moderate areas and volumes of soil and groundwater. Because of the proximity of Group II SWMUs to the St. Johns River, this group may adversely impact sensitive environmental receptors by groundwater or soil migration pathways. RFI and confirmatory sampling activities were conducted at Group II SWMUs in 1993 and 1994.

Floating free-phase petroleum hydrocarbons were found on the water table aquifer near SWMU 8. Interim measures as described in the draft Interim Measures

workplan, SWMUs 6 and 7 (ABB-ES, 1994d), will be implemented in 1995 to remove the free-phase petroleum hydrocarbons as a source of groundwater contamination. None of the contaminants released from SWMUs in Group II appear to present an immediate hazard to public health.

The Group III SWMUs are ranked as Priority 3. This group has a "low" perceived relative risk. This group as a unit was perceived to have a variety of possible types of contaminants potentially affecting localized areas and volumes of soil and groundwater. Some of the SWMUs are operated under an NPDES permit for point discharges. Because of the proximity of Group III SWMUs to the turning basin, the St. Johns River, and the Atlantic Ocean, this group may adversely impact sensitive environmental receptors by groundwater or soil pathways. None of the contaminants that may be released from SWMUs in Group III are perceived to present an immediate hazard to public health. RFI and confirmatory sampling at Group III SWMUs as described in the RFI workplan Addendum 5 (ABB-ES, 1994e) and the RFA/SV workplan, Group III SWMUs (ABB-ES, 1994f) will be implemented in 1995.

The Group IV SWMUs are ranked as Priority 4. This group has the "lowest" perceived relative risk. This group as a unit has a variety of possible types of contaminants potentially affecting localized areas and volumes of soil and groundwater. No quantitative analytical data exist for Group IV SWMUs to assess whether release to the environment has occurred. The AOCs are managed as USTs or UST appurtenances under RCRA (e.g., 40 Code of Federal Regulations [CFR] 280 and applicable State regulations). Anticipated investigations for this group will include RFA/SVs (confirmatory sampling) for designated SWMUs and assessment of AOCs to determine if designation as an RCRA SWMU are appropriate. A workplan for the investigation of Group IV SWMUs will be developed in 1995.

5.0 CORRECTIVE ACTION MANAGEMENT PLAN (CAMP) SCHEDULE

5.1 SCHEDULING ASSUMPTION. The basis of the CAMP schedule (Appendix A) is the schedule of compliance specified in the current HSWA permit (USEPA 1993a; Appendix D). Additional details are presented in the CAMP schedule to show the tasks and durations anticipated for assessing each SWMU group and implementing corrective measures as required. This schedule is idealized and is based on the following assumptions.

- Timely and adequate resources will be available to the Navy to carry out the required tasks.
- RFI workplans, RFI reports, CMS workplans, and CMS reports will be considered "primary" documents.
- Confirmatory sampling (RFA/SV) workplans, confirmatory sampling (RFA/SV) reports, interim measures workplans, and interim measures reports will be considered "secondary" documents. workplan addenda, report addenda, or technical memoranda will also be considered secondary documents.
- workplans will contain operational schedules for implementation of their specific scope of work. The final approved workplan schedules will have precedence over the CAMP schedule.
- Partnering team (Navy, USEPA, and Florida Department of Environmental Protection) meetings will be scheduled on a regular basis as needed depending on corrective action program activities.
- Regulatory agencies will provide review and comment on documents in a timely fashion.
- Restoration Advisory Board (RAB) meetings will be scheduled on a regular basis as needed depending on corrective action program activities.
- The scope of corrective actions will be revised in response to new information gathered during field investigations and corrective measures. Applicable schedule revisions will be made to the CAMP due to scope changes, in accordance with the HSWA permit conditions.

5.2 DELIVERABLE SCHEDULE. Appendix B presents the milestone deliverable dates for primary and secondary documents. The schedule was developed based on the assumptions described in Section 5.1. Primary deliverables (e.g., applicable workplans and reports, described below) will be submitted to the USEPA Regional Administrator as draft documents. Regulatory comments will be incorporated into the document and the document will be resubmitted to the USEPA Regional Administrator as a final document. The USEPA Regional Administrator will then approve the document or issue Notice of Technical Inadequacy (NOTI) as appropriate. If no response from the USEPA Regional Administrator is received within 30 calendar days of the final submittal, the document will be considered

ready to be implemented in accordance with the CAMP or applicable workplan schedule, as appropriate.

Reasonable attempts will be made by NAVSTA Mayport to comply with the deliverable dates. However, when a deliverable deadline cannot be achieved, NAVSTA Mayport will notify the USEPA Regional Administrator as soon as it is known, but no later than 14 calendar days before the deliverable date. The notification will describe the reason for the delay and request a revision to the deliverable date. This notification will be subject to the USEPA Regional Administrator's approval. In addition, the CAMP schedule will be updated on an annual basis to reflect existing conditions found at NAVSTA Mayport. Revision of the CAMP will be subject to the USEPA Regional Administrator's approval.

As described in Chapter 1.0, Introduction, confirmatory sampling and RFI activities may require iterative investigative rounds to obtain sufficient site characterization data to support corrective measures decisions. If confirmatory sampling results at an SWMU indicate a need for additional investigation, the next investigative round at that SWMU will be an RFI. If characterization sampling at an SWMU undergoing an RFI indicates the need for additional investigation, subsequent investigative rounds would be implemented to resolve significant data gaps.

Two families of deliverables deserve special note, workplan addenda for additional investigations and reporting of investigative results.

Workplan Addenda for Additional Investigations. The scope of work for subsequent investigations will be presented in workplan addenda that are attachments to the existing approved RFI workplan (ABB-ES, 1991). The workplan addenda will describe SWMU-specific sampling activities and refer to applicable quality assurance and quality control (QA/QC) requirements and standard operating procedures described in the approved RFI workplan (ABB-ES, 1991).

Workplan addenda for confirmatory sampling will be titled *RCRA Facility Assessment Sampling Visit Workplan Addendum* (RFA/SV workplan Addendum) for the applicable SWMU or group of SWMUs. Workplan addenda for confirmatory sampling will be considered secondary documents. RFA/SV workplans have been prepared for SWMU Groups I, II, and III, and implemented for SWMU Groups I and II.

The scope of the subsequent RFA/SV workplan addenda will be designed to achieve a preliminary level of exposure pathway characterization so that a preliminary risk evaluation can be accomplished. This will provide a greater degree of confidence in determining if no further action at this time is appropriate for the applicable SWMUs. This level of effort at the confirmatory sampling stage will also collect the majority of data needed for site characterization if an RFI is found to be necessary. This will allow subsequent investigations at the RFI stage to focus on resolving outstanding data gap issues discovered during confirmatory sampling and permit timely progress to the CMS stage.

Workplan addenda for characterization sampling will be titled *RCRA Facility Investigation Workplan Addendum* (RFI Workplan Addendum) for the applicable SWMU or group of SWMUs. RFI workplan addenda will be considered secondary documents. The RFI workplan addenda will be prepared for SWMUs where confirmatory sampling results indicate that an RFI is required, and at SWMUs where RFI activities

conducted under the approved RFI workplan indicate that additional investigation is required to resolve significant data gaps.

By making the workplan addenda for additional investigations derivative documents of the approved RFI workplan, regulatory review can focus on the SWMU-specific scope of the proposed investigation because information on facility background, QA/QC protocols, and standard operating procedures has already been presented in the approved RFI workplan.

Reporting of Investigative Results. Confirmatory sampling results obtained from implementation of the RFA/SV workplan addenda will be presented in RFA/SV reports. RFA/SV reports will be considered secondary documents.

RFA/SV reports will present investigative findings, conclusions, and recommendations. As previously described, the RFA/SV reports will present a preliminary site characterization and a preliminary risk evaluation. A recommendation of no further action at this time or RFI for applicable SWMUs will be based on this analysis.

Characterization sampling results at SWMU groups will be reported in RFI reports. RFI reports will be considered primary documents. The RFI reports will present the investigative findings, conclusions, and recommendations. If additional investigation is necessary for a given SWMU or SWMU group (as described in the applicable RFI workplan addendum), results will be reported in RFI addenda reports. RFI addenda reports will be considered primary documents.

RFI addenda reports will be attachments to the initial RFI report for the applicable SWMU group. This report structure will allow the majority of characterization data to be presented in the initial RFI report reviewed by the USEPA Regional Administrator prior to implementation of any subsequent work. This will permit the RFI addenda report to supplement the initial RFI report without repeating previously reported data and conclusions. This will allow regulatory review to focus on assessment of new results and conclusions so that data gap issues can be resolved for timely transition to the CMS stage.

REFERENCES

- ABB Environmental Services, Inc., (ABB-ES), 1991, Interim Final RFI Workplan Volumes I, II and III, U.S. Naval Station Mayport, Florida: prepared for Southern Division, Naval Facilities Engineering Command (SOUTHNAVFACENGCOM), Charleston, South Carolina, October.
- ABB-ES, 1992a, RCRA Facility Assessment Sampling Visit Workplan, Group I SWMUs, U.S. Naval Station Mayport, Florida: prepared for SOUTHNAVFACENGCOM Charleston, South Carolina, February.
- ABB-ES, 1992b, Final RCRA Facility Investigation Report, Phase I, Volumes I and II, U.S. Naval Station Mayport, Florida: prepared for SOUTHNAVFACENGCOM, South Carolina, November.
- ABB-ES, 1992c, Final Draft RCRA Facility Assessment Sampling Visit Report, Phase I, U.S. Naval Station Mayport, Florida: prepared for SOUTHNAVFACENGCOM, Charleston, South Carolina, November.
- ABB-ES, 1992d, RFI Workplan, Addenda 1, 2, and 3, Investigation Derived Waste Management Plan, Phase 2 Background Sampling and Analysis Plan, Light Non-Aqueous Phase Liquid (LNAPL) Sampling and Analysis Plan: prepared for SOUTHNAVFACENGCOM, December.
- ABB-ES, 1993a, Draft RCRA Facility Assessment Sampling Visit Workplan Addendum I, Group I SWMUs 26, 49, 50 and 56, U.S. Naval Station Mayport, Mayport, Florida: prepared for SOUTHNAVFACENGCOM, Charleston, South Carolina, November.
- ABB-ES, 1993b, Draft RCRA Facility Investigation Workplan, Supplemental Sampling Plan, Addendum 4, Group I and II SWMUs, U.S. Naval Station Mayport, Mayport, Florida: prepared for SOUTHNAVFACENGCOM, Charleston, South Carolina, December.
- ABB-ES, 1993c, Final Draft RCRA Facility Assessment Sampling Visit Work Plan Group II SWMUs, U.S. Naval Station Mayport, Florida: prepared for SOUTHNAVFACENGCOM, Charleston, South Carolina, November.
- ABB-ES, 1994a, Final Technical Memorandum Background Characterization Activities, RCRA Facility Investigation, U.S. Naval Station Mayport, Mayport, Florida: prepared for SOUTHNAVFACENGCOM, Charleston, South Carolina, April.
- ABB-ES, 1994b, Draft Interim Measures Workplan, SWMU 19, Naval Aviation Depot Blasting Area, Naval Station Mayport, Mayport, Florida: prepared for SOUTHNAVFACENGCOM, Charleston, South Carolina, May.
- ABB-ES, 1994c, Draft Interim Measures Workplan, SWMU 2, Polychlorinated Biphenyl (PCB) Area, Naval Station Mayport, Mayport, Florida: prepared for SOUTHNAVFACENGCOM, Charleston, South Carolina, May.

REFERENCES (Continued)

- ABB Environmental Services, Inc. (ABB-ES), 1994d, Draft Interim Measures Workplan, SWMUs 6 and 7, Sludge Drying Beds Area, Naval Station Mayport, Mayport, Florida: prepared for SOUTHNAVFACENGCOC, Charleston, South Carolina, May.
- ABB-ES, 1994e, Final RCRA Facility Investigation Workplan, Supplemental Sampling Plan, Addendum 5, Group III SWMUs, Naval Station Mayport, Mayport, Florida: prepared for SOUTHNAVFACENGCOC, Charleston, South Carolina, November.
- ABB-ES, 1994f, Final RCRA Facility Assessment Sampling Visit Workplan, Group III SWMUs 20,21,29, 46, and 52, Naval Station Mayport, Mayport, Florida: prepared for SOUTHNAVFACENGCOC, Charleston, South Carolina, November.
- ABB-ES, 1995a, Draft RCRA Facility Investigation General Information Report, Naval Station Mayport, Mayport, Florida: prepared for SOUTHNAVFACENGCOC, Charleston, South Carolina, February.
- ABB-ES, 1995b, Final Corrective Measures Study Workplan, Naval Station Mayport, Mayport, Florida: prepared for SOUTHNAVFACENGCOC, Charleston, South Carolina, February.
- A.T. Kearny, 1989, RCRA Facility Assessment of the Naval Station Mayport, Jacksonville, Florida (Draft): prepared for U.S. Environmental Protection Agency (USEPA), September, 165 p.
- C.E. Environmental, 1989, Final Draft RCRA Facility Investigation Work Plan, U.S. Naval Station Mayport, Florida: prepared for SOUTHNAVFACENGCOC, Charleston, South Carolina, December.
- U.S. Environmental Protection Agency (USEPA), 1988, HSWA Permit Number FL9-170-024-260: USEPA Region IV, March 25.
- USEPA, 1991a, Letter with enclosures from USEPA (John Dickinson, Waste Compliance Section, RCRA and Federal Facilities Branch, Region IV) to Department of the Navy (Captain Peter Long, Commanding Officer, Naval Station Mayport), May 6.
- USEPA, 1991b, Letter from USEPA (John H. Scarbrough, RCRA and Federal Facilities Branch Division, Waste Management Division, Region IV) to Department of the Navy (Captain J. B. Mitchell, Jr., Commanding Officer, Naval Station Mayport), June 14.
- USEPA, 1991c, Letter from USEPA (John H. Scarbrough, RCRA and Federal Facilities Branch Division, Waste Management Division, Region IV) to Department of the Navy (Captain J. B. Mitchell, Jr., Commanding Officer, Naval Station Mayport), October 24.
- USEPA, 1993, HSWA Permit Number FL9-170-024-260: USEPA Region IV, June 15.

APPENDIX A
CORRECTIVE ACTION MANAGEMENT PLAN SCHEDULE

1994 1995 1996
 A M J J A S O N D J F M A M J J J A S O N D J F M A M J J A S O N D

ACTIVITY ID	ACTIVITY DESCRIPTION	EARLY START	EARLY FINISH
179.02	SUBMIT SMMU 2 IM WORKPLAN		12MAY94
187.02	SUBMIT SMMU 19 IM WORKPLAN		12MAY94
183.02	SUBMIT SMMU 6/7 IM WORKPLAN		19MAY94
154.02	SUBMIT DRAFT CMS WORKPLAN		21DEC94
016.02	SUBMIT DRAFT G1R		3FEB95
155.04	SUBMIT FINAL CMS WORKPLAN		10FEB95
099.02	SUBMIT DRAFT GROUP I RFA REPORT AD		7APR95
116.02	SUBMIT DRAFT GR II RFA REPORT		7APR95
138.02	SUBMIT DRAFT FINAL GR IV RFA WP		12MAY95
046.02	SUBMIT DRAFT GROUP II RFI REPORT		26MAY95
016.06	SUBMIT FINAL G1R		9JUN95
100.03	SUBMIT RESPONSE TO REG CMNTS GROUP I RFA RPT		21JUN95
117.03	SUBMIT RESPONSE TO REG COMMENTS GR II RFA RPT		21JUN95
030.02	SUBMIT DRAFT GROUP I RFI RPT		23JUN95
162.02	SUBMIT DRAFT CMS REPORT GROUP II		12JUL95
191.02	SUBMIT FINAL GROUP I RFA REPORT AD		21JUL95
119.02	SUBMIT FINAL GR II RFA REPORT		21JUL95
047.04	SUBMIT RESPONSE TO REG CMNTS GROUP II RFI RPT		10AUG95
139.03	SUBMIT RESPONSE TO REG COMMENTS GR IV RFA WP		11AUG95
156.02	SUBMIT DRAFT CMS REPORT GROUP I		15AUG95
031.03	SUBMIT RESP. TO REG COMMENTS GROUP I RFI RPT		6SEP95
140.02	SUBMIT FINAL GR IV RFA WP		8SEP95
048.02	SUBMIT FINAL GROUP II RFI RPT		11SEP95
032.02	SUBMIT FINAL GROUP I RFI RPT		5OCT95
164.02	SUBMIT FINAL GROUP II CMS REPORT		6NOV95
158.02	SUBMIT FINAL GROUP I CMS REPORT		14DEC95
132.02	SUBMIT DRAFT GR III RFA REPORT		3FEB96
063.02	SUBMIT DRAFT GROUP III RFI RPT		2FEB96
168.02	SUBMIT DRAFT CMS REPORT GROUP III		12MAR96
133.03	SUBMIT RESPONSE TO REG COMMENTS GR III RFA RPT		29APR96
064.04	SUBMIT RESP TO REG COMMENTS GROUP III RFI RPT		30APR96
134.02	SUBMIT FINAL GR III RFA RPT		29MAY96
065.02	SUBMIT FINAL GROUP III RFI REPORT		31MAY96
170.02	SUBMIT FINAL GROUP III CMS REPORT		10JUL96
148.02	SUBMIT DRAFT GR IV RFA REPORT		18JUL96
149.03	SUBMIT RESPONSE TO REG COMMENTS GR IV RFA RPT		18OCT96
150.02	SUBMIT FINAL GR IV RFA REPORT		18NOV96

NAVYCLEAN
NS MAYPORT CAMP SCHEDULE
MILESTONE SCHEDULE

Sheet 1 of 1

Plot Date	2MAR95	Activity	Baseline/Early Dates
Data Date	15EP93	Control Activity	None
Project Start	15EP93	Revision	1
Project Finish	30DEC99	Checked	Approved

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ACTIVITY ID	ACTIVITY DESCRIPTION	ORIG DUR	EARLY START	EARLY FINISH	1994	1995	1996	1997	1998	1999
002.00	PRM MEETINGS (QUARTERLY)	1606	1SEP93	30DEC99						
003.00	TRC MEETINGS (SEMI-ANNUALLY)	255	1SEP93	1SEP94						
004.00	RIAB MEETINGS (QUARTERLY)	1166	1FEB95	1SEP99						
005.00	RFI PROGRESS REPORTS (QUARTERLY)	1586	1SEP93	1DEC99						
006.00	IM PROGRESS REPORTS (SEMI-ANNUALLY)	1270	1SEP94	1SEP99						
007.00	WASTE MIN. CERTIF. CONDITION III (ANNUALLY)	1555	1SEP93	15OCT99						
009.00	PROCUREMENT/SUBCONTRACTING-BEGINNING OF EACH FY	1524	15OCT93	15OCT99						
011.01	BACKGROUND CHARACTERIZATION TM (20)	164	1SEP93	25APR94						
016.00	GENERAL INFORMATION REPORT	155	31OCT94	9JUN95						
016.01	PREPARE DRAFT GIR	66	31OCT94	3FEB95						
016.02	SUBMIT DRAFT GIR	0		3FEB95						
016.03	REGULATORY REVIEW DRAFT GIR	45	6FEB95	7APR95						
016.04	RESPONSE TO COMMENTS DRAFT GIR	22	10APR95	9MAY95						
016.05	PREPARE FINAL GIR	22	10MAY95	9JUN95						
016.06	SUBMIT FINAL GIR	0		9JUN95						
017.01	GROUP I SMMUS RFI	501	15OCT93	5OCT95						
018.01	GROUP I RFI WORKPLAN ADDENDUM 4	179	15OCT93	29JUN94						
023.01	GROUP I RFI FIELD INVESTIGATION	243	9MAY94	21APR95						
024.01	SUBMIT EPA SAMPLING NOTICE GROUP I RFI	0	9MAY94							
025.01	PROCUREMENT/MOBILIZATION GROUP I RFI	16	9MAY94	31MAY94						
026.01	FIELD ACTIVITIES GROUP I RFI	105	31MAY94	26OCT94						
027.01	DATA REDUCTION AND ANALYSIS GROUP I RFI	124	26OCT94	21APR95						
028.01	GROUP I RFI REPORT	117	21APR95	5OCT95						
028.02	GROUP I RISK ASSESSMENT	30	24APR95	5JUN95						
029.01	DRAFT GROUP I RFI REPORT	45	21APR95	23JUN95						
030.02	SUBMIT DRAFT GROUP I RFI RPT	0		23JUN95						
031.01	REGULATORY REVIEW GROUP I RFI RPT	30	26JUN95	7AUG95						
031.02	RESPONSE TO REG. COMMENTS GROUP I RFI RPT	22	7AUG95	6SEP95						
031.03	SUBMIT RESP. TO REG COMMENTS GROUP I RFI RPT	0		6SEP95						
032.01	FINAL GROUP I RFI REPORT	22	6SEP95	5OCT95						
032.02	SUBMIT FINAL GROUP I RFI RPT	0		5OCT95						
033.01	GROUP II SMMUS RFI	483	15OCT93	11SEP95						
034.01	GROUP II RFI WORKPLAN ADDENDUM 4	179	15OCT93	29JUN94						
039.01	GROUP II RFI FIELD INVESTIGATION	219	9MAY94	20MAR95						
040.01	EPA SAMPLING NOTICE GROUP II RFI	0	9MAY94							
041.01	PROCUREMENT/MOBILIZATION GROUP II RFI	16	9MAY94	31MAY94						

NAVYCLEAN
NS MAYPORT CAMP SCHEDULE
PROJECTED SCHEDULE

Sheet 1 of 5

BASELINE PROJECT SCHEDULE	
Date	Approved
Revision	Checked

Plot Date: 2MAR95
 Data Date: 1SEP93
 Project Start: 1SEP93
 Project Finish: 30DEC99

Activity Bar/Early Dates
 Critical Activity
 Progress Bar
 Milestone/Flag Activity

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ACTIVITY ID	ACTIVITY DESCRIPTION	ORIG DUR	EARLY START	EARLY FINISH	Year					
					1994	1995	1996	1997	1998	1999
042.01	FIELD ACTIVITIES GROUP II RFI	105	31MAY94	26OCT94						
043.01	DATA REDUCTION AND ANALYSIS GROUP II RFI	100	26OCT94	20MAR95						
044.01	GROUP II RFI REPORT	122	21MAR95	11SEP95						
044.02	GROUP II RISK ASSESSMENT	30	21MAR95	1MAY95						
045.01	DRAFT GROUP II RFI REPORT	49	21MAR95	26MAY95						
046.02	SUBMIT DRAFT GROUP II RFI REPORT	0		26MAY95						
047.01	REGULATORY REVIEW GROUP II RFI RPT	30	30MAY95	11JUL95						
047.02	RESPONSE TO REG. COMMENTS GROUP II RFI RPT	23	11JUL95	10AUG95						
047.04	SUBMIT RESPONSE TO REG CHNTS GROUP II RFI RPT	0		10AUG95						
048.01	FINAL GROUP II RFI REPORT	22	10AUG95	11SEP95						
048.02	SUBMIT FINAL GROUP II RFI RPT	0		11SEP95						
050.01	GROUP III SMMUS RFI	551	1APR94	31MAY96						
051.01	GROUP III RFI WORKPLAN ADDENDUM 5	159	1APR94	14NOV94						
056.01	GROUP III RFI FIELD INVESTIGATION	178	15FEB95	25OCT95						
057.01	EPA SAMPLING NOTICE GROUP III RFI	0	15FEB95							
058.01	PROCUREMENT/MOBILIZATION GROUP III RFI	20	15FEB95	14MAR95						
059.01	FIELD ACTIVITIES GROUP III RFI	117	14MAR95	25AUG95						
060.01	DATA REDUCTION AND ANALYSIS GROUP III RFI	55	9AUG95	25OCT95						
061.00	GROUP III RISK ASSESSMENT	45	26OCT95	2JAN96						
061.01	GROUP III RFI REPORT (10)	152	26OCT95	31MAY96						
062.01	DRAFT GROUP III RFI REPORT	68	26OCT95	2FEB96						
063.02	SUBMIT DRAFT GROUP III RFI RPT	0		2FEB96						
064.01	REGULATORY REVIEW GROUP III RFI RPT	40	5FEB96	29MAR96						
064.02	RESPONSE TO REG. COMMENTS GROUP III RFI RPT	23	29MAR96	30APR96						
064.04	SUBMIT RESP TO REG COMMENTS GROUP III RFI RPT	0		30APR96						
065.01	FINAL GROUP III RFI REPORT	22	1MAY96	31MAY96						
065.02	SUBMIT FINAL GROUP III RFI REPORT	0		31MAY96						
083.01	GROUP I RFA SMMUS (CONFIRMATORY SAMPLING)	448	15OCT93	21JUL95						
084.01	GROUP I RFA WP ADDENDUM (CONFIRM. SAMP.)	166	15OCT93	10JUN94						
090.01	GROUP I RFA FIELD INVEST. (CONFIRM. SAMP.)	194	9MAY94	13FEB95						
092.01	EPA SAMPLING NOTICE GROUP I RFA	0	9MAY94							
093.01	PROCUREMENT/MOBILIZATION GROUP I RFA	16	9MAY94	31MAY94						
094.01	FIELD ACTIVITIES GROUP I RFA	105	31MAY94	26OCT94						
095.01	DATA REDUCTION AND ANALYSIS GROUP I RFA	75	26OCT94	13FEB95						
096.01	GROUP I RFA RPT ADDEN. (CONFIRM. SAMP.) 20	113	13FEB95	21JUL95						
098.01	DRAFT GROUP I RFA REPORT AD	40	13FEB95	7APR95						
099.02	SUBMIT DRAFT GROUP I RFA REPORT AD	0		7APR95						
100.01	REGULATORY REVIEW GROUP I RFA RPT AD	30	10APR95	19MAY95						
100.02	RESPONSE TO REG. COMMENTS GROUP I RFA RPT	23	19MAY95	21JUN95						
100.03	SUBMIT RESPONSE TO REG CHNTS GROUP I RFA RPT	0		21JUN95						

1994 1995 1996 1997 1998 1999

ACTIVITY ID ACTIVITY DESCRIPTION ORIG DUR EARLY START EARLY FINISH

ACTIVITY ID	ACTIVITY DESCRIPTION	ORIG DUR	EARLY START	EARLY FINISH
101.01	FINAL GROUP I RFA REPORT AD	22	21JUN95	21JUL95
101.02	SUBMIT FINAL GROUP I RFA REPORT AD	0		21JUL95
103.01	GROUP II RFA SWMUS (CONFIRMATORY SAMPLING)	448	15OCT93	21JUL95
104.01	GROUP II RFA WORKPLAN (CONFIRMATORY SAMPLING)	166	15OCT93	10JUN94
109.01	GROUP II RFA FIELD INVESTIGATION (CONFIRM SAMPLING)	194	9MAY94	13FEB95
110.01	EPA SAMPLING NOTICE GR II RFA	0	9MAY94	
111.01	PROCUREMENT/MOBILIZATION GR II RFA	16	9MAY94	31MAY94
112.01	FIELD ACTIVITIES GR II RFA	105	31MAY94	26OCT94
113.01	DATA REDUCTION AND ANALYSIS GR II RFA	75	26OCT94	13FEB95
114.01	GROUP II RFA REPORT (CONFIRMATORY SAMPLING) (10)	113	13FEB95	21JUL95
115.01	DRAFT GR II RFA REPORT	40	13FEB95	7APR95
116.02	SUBMIT DRAFT GR II RFA REPORT	0		7APR95
117.01	REGULATORY REVIEW AND COMMENTS (10)	30	10APR95	19MAY95
117.02	RESPONSE TO REGULATORY COMMENTS	23	19MAY95	21JUN95
117.03	SUBMIT RESPONSE TO REG COMMENTS GR II RFA RPT	0		21JUN95
118.01	FINAL GR II RFA REPORT	22	21JUN95	21JUL95
118.02	SUBMIT FINAL GR II RFA REPORT	0		21JUL95
119.01	GROUP III RFA SWMUS (CONFIRMATORY SAMPLING)	544	8APR94	29MAY96
120.01	GROUP III RFA WORKPLAN (CONFIRM SAMPLING) (10)	154	8APR94	14NOV94
125.01	GROUP III RFA FIELD INVEST. (CONFIRM. SAMPLING)	187	22FEB95	14NOV95
126.01	EPA SAMPLING NOTICE GR III RFA	0	22FEB95	
127.01	PROCUREMENT/MOBILIZATION GR III RFA	20	22FEB95	21MAR95
128.01	FIELD ACTIVITIES GR III RFA	105	21MAR95	16AUG95
129.01	DATA REDUCTION AND ANALYSIS GR III RFA	64	16AUG95	14NOV95
130.01	GROUP III RFA REPORT (CONFIRM SAMPLING) (10)	137	14NOV95	29MAY96
131.01	DRAFT GR III RFA REPORT	54	14NOV95	1FEB96
132.02	SUBMIT DRAFT GR III RFA REPORT	0		1FEB96
133.01	REGULATORY REVIEW GR III RFA RPT	40	2FEB96	28MAR96
133.02	RESPONSE TO REG. GR III RFA RPT	23	28MAR96	29APR96
133.03	SUBMIT RESPONSE TO REG COMMENTS GR III RFA RPT	0		29APR96
134.01	FINAL GR III RFA REPORT	22	29APR96	29MAY96
134.02	SUBMIT FINAL GR III RFA RPT	0		29MAY96
135.01	GROUP IV RFA WORKPLAN (CONFIRM. SAMPLING) (10)	433	9MAR95	18NOV96
136.01	GROUP IV RFA WORKPLAN (CONFIRM. SAMPLING) (10)	129	9MAR95	8SEP95
137.01	DRAFT GR IV RFA WP	47	9MAR95	12MAY95
138.02	SUBMIT DRAFT FINAL GR IV RFA WP	0		12MAY95
139.01	REGULATORY REVIEW GR IV RFA WP	44	15MAY95	17JUL95
139.02	RESPONSE TO REG. GR IV RFA WP	20	17JUL95	11AUG95
139.03	SUBMIT RESPONSE TO REG COMMENTS GR IV RFA WP	0		11AUG95
140.01	FINAL GR IV RFA WP	20	11AUG95	8SEP95

ACTIVITY ID	ACTIVITY DESCRIPTION	ORIG DUR	EARLY START	EARLY FINISH	Year					
					1994	1995	1996	1997	1998	1999
140.02	SUBMIT FINAL GR IV RFA WP	0		BSEP95						
141.01	GROUP IV RFA FIELD INVESTIGATION (10)	139	300C195	15MAY96						
142.01	EPA SAMPLING NOTICE GR IV RFA	0	300C195							
143.01	PROCUREMENT/MOBILIZATION GR IV RFA	14	300C195	16NOV95						
144.01	FIELD ACTIVITIES GR IV RFA	63	16NOV95	16FEB96						
145.01	DATA REDUCTION AND ANALYSIS GR IV RFA	64	16FEB96	15MAY96						
146.01	GROUP IV RFA REPORT (10)	131	15MAY96	18NOV96						
147.01	DRAFT GR IV RFA REPORT	45	15MAY96	18JUL96						
148.02	SUBMIT DRAFT GR IV RFA REPORT	0		18JUL96						
149.01	REGULATORY REVIEW GR IV RFA RPT	44	19JUL96	19SEP96						
149.02	RESPONSE TO REG. GR IV RFA RPT	22	19SEP96	18OCT96						
149.03	SUBMIT RESPONSE TO REG COMMENTS GR IV RFA RPT	0		18OCT96						
150.01	FINAL GR IV RFA REPORT	22	18OCT96	18NOV96						
150.02	SUBMIT FINAL GR IV RFA REPORT	0		18NOV96						
153.01	GROUP I SMMUS CMS	402	16MAY94	14DEC95						
154.01	DRAFT CMS WORKPLAN	153	16MAY94	21DEC94						
154.02	SUBMIT DRAFT CMS WORKPLAN	0		21DEC94						
155.01	REGULATORY REVIEW CMS WP	20	22DEC94	20JAN95						
155.02	RESPONSE TO REG. CMS WP	5	23JAN95	27JAN95						
155.03	FINAL CMS WORKPLAN	10	30JAN95	10FEB95						
155.04	SUBMIT FINAL CMS WORKPLAN	0		10FEB95						
156.01	GROUP I CMS IMPLEMENTATION & REPORT (10)	50	6JUN95	15AUG95						
156.02	SUBMIT DRAFT CMS REPORT GROUP I	0		15AUG95						
157.01	REGULATORY REVIEW GR I CMS WPI	40	16AUG95	11OCT95						
157.02	RESPONSE TO REG. GR I CMS RPT	22	12OCT95	10NOV95						
158.01	GR I CMS RPT REVISION/STATEMENT OF BASIS	22	13NOV95	14DEC95						
158.02	SUBMIT FINAL GROUP I CMS REPORT	0		14DEC95						
159.01	GROUP II SMMUS CMS	132	2MAY95	6NOV95						
162.01	GROUP II CMS IMPLEMENTATION & REPORT (10)	50	2MAY95	12JUL95						
162.02	SUBMIT DRAFT CMS REPORT GROUP II	0		12JUL95						
163.01	REGULATORY REVIEW COMMENTS GR II CMS RPT	40	12JUL95	6SEP95						
163.02	RESPONSE TO REG. GR II RPT	22	6SEP95	5OCT95						
164.01	GR II CMS RPT REVISION/STATEMENT OF BASIS (10)	22	6OCT95	6NOV95						
164.02	SUBMIT FINAL GROUP II CMS REPORT	0		6NOV95						
165.01	GROUP III SMMUS CMS	134	3JAN96	10JUL96						
168.01	GROUP III CMS IMPLEMENTATION & REPORT (10)	50	3JAN96	12MAR96						
168.02	SUBMIT DRAFT CMS REPORT GROUP III	0		12MAR96						
169.01	REGULATORY REVIEW GR III CMS RPT	40	13MAR96	7MAY96						
169.02	RESPOND TO REG. COMMENTS GR III CMS RPT	22	8MAY96	7JUN96						
170.01	GR III CMS RPT REVISION/STATEMENT OF BASIS (10)	22	10JUN96	10JUL96						

ACTIVITY ID	ACTIVITY DESCRIPTION	ORIG DUR	EARLY START	EARLY FINISH	Year					
					1994	1995	1996	1997	1998	1999
170.02	SUBMIT FINAL GROUP III CMS REPORT	0		10-JUL-96						
178.01	SMMU 2 IM	379	1APR94	27SEP95						
179.01	SMMU 2 IM WORKPLAN (20)	30	1APR94	12MAY94						
179.02	SUBMIT SMMU 2 IM WORKPLAN	0		12MAY94						
180.01	REGULATORY REVIEW SMMU 2 IM WP	64	12MAY94	11AUG94						
181.01	SMMU 2 IM IMPLEMENTATION	171	27JAN95	27SEP95						
182.01	SMMU 6/7 IM	379	1APR94	27SEP95						
183.01	SMMU 6/7 IM WORKPLAN (20)	35	1APR94	19MAY94						
183.02	SUBMIT SMMU 6/7 IM WORKPLAN	0		19MAY94						
184.01	REGULATORY REVIEW SMMU 6/7 IM WP	64	19MAY94	18AUG94						
185.01	SMMU 6/7 IM IMPLEMENTATION	171	27JAN95	27SEP95						
186.01	SMMU 19 IM	379	1APR94	27SEP95						
187.01	SMMU 19 IM WORKPLAN (20)	30	1APR94	12MAY94						
187.02	SUBMIT SMMU 19 IM WORKPLAN	0		12MAY94						
188.01	REGULATORY REVIEW SMMU 19 IM WP	64	12MAY94	11AUG94						
189.01	SMMU 19 IM IMPLEMENTATION	171	27JAN95	27SEP95						
190.01	GROUP I RD/RA	1026	15DEC95	30DEC99						
191.01	GROUP II RD/RA	1052	7NOV95	30DEC99						
192.01	GROUP III RD/RA	881	11JUL95	30DEC99						
194.01	GROUP I OPERATIONS & MAINTENANCE	305	16OCT98	30DEC99						
195.01	GROUP II OPERATIONS & MAINTENANCE	305	16OCT98	30DEC99						
196.01	GROUP III OPERATIONS & MAINTENANCE	213	1MAR99	30DEC99						

APPENDIX B
SCHEDULE OF DELIVERABLES

Mayport CAMP

Deliverable Schedule – Revised 03/95

	Primary/ Secondary	Completion Date	Approval Date
Mayport RFI			
Draft RFI General Information Report Regulatory Review of Draft RFI General Information Report Response to Regulatory Comments on Draft RFI GIR Report Final RFI General Information Report	Primary	26 Jan 95	
Draft Corrective Measures Study Workplan Regulatory Review of Draft CMS Workplan Response to Regulatory Comments on Draft CMS Workplan Final Corrective Measures Study Workplan	Primary	21 Dec 94	
Group I RFI/CMS			
Draft RFI Workplan Addendum 4, Supplemental Sampling Plan Regulatory Review of RFI Workplan Addendum 4 Response to Regulatory Comments on RFI Workplan Addendum 4 Final RFI Workplan Addendum 4, Supplemental Sampling Plan	Secondary	29 Nov 93	
Draft Group I RFI Report and Risk Assessment Regulatory Review of Group I RFI Report and Risk Assessment Response to Regulatory Comments on Group I RFI Report and RA Final Group I RFI Report and Risk Assessment	Primary	23 Jun 95	
Draft Group I CMS Report Regulatory Review of Group I CMS Report Response to Regulatory Comments on Draft Group I CMS Report Final Group I CMS Report	Primary	15 Aug 95	
Group I RFA/SV (Confirmatory Sampling)			
Draft RFA/SV Workplan Addendum, Group I SWMUs Regulatory Review and Comment Response to Regulatory Comments Final RFA/SV Workplan Addendum, Group I SWMUs	Secondary	29 Nov 93	30 Mar 94
Draft RFA/SV (Confirmatory Sampling) Report, Group I & II SWMUs Regulatory Review and Comment Response to Regulatory Comments Final RFA/SV (Confirmatory Sampling) Report, Group I & II SWMUs	Secondary	7 Apr 95	
Group II RFI/CMS			
Draft RFI Workplan Addendum 4, Supplemental Sampling Plan Regulatory Review of RFI Workplan Addendum 4 Response to Regulatory Comments on RFI Workplan Addendum 4 Final RFI Workplan Addendum 4, Supplemental Sampling Plan	Secondary	29 Nov 93	
Draft Group II RFI Report and Risk Assessment Regulatory Review of Group II RFI Report and Risk Assessment Response to Regulatory Comments on Group II RFI Report and RA Final Group II RFI Report and Risk Assessment	Primary	26 May 95	
Draft Group II CMS Report Regulatory Review of Group II CMS Report Response to Regulatory Comments on Draft Group II CMS Report Final Group II CMS Report	Primary	12 Jul 95	
Group II RFA/SV (Confirmatory Sampling)			
Draft RFA/SV Workplan, Group II SWMUs Regulatory Review and Comment Response to Regulatory Comments Final RFA/SV Workplan, Group II SWMUs	Secondary	29 Nov 93	30 Mar 94
Draft RFA/SV (Confirmatory Sampling) Report, Group I & II SWMUs Regulatory Review and Comment Response to Regulatory Comments Final RFA/SV (Confirmatory Sampling) Report, Group I & II SWMUs	Secondary	7 Apr 95	
	Secondary	21 Jul 95	

Mayport CAMP

Deliverable Schedule – Revised 03/95

	Primary/ Secondary	Completion Date	Approval Date
Group III RFI/CMS			
Draft RFI Workplan Addendum 5, Group III SWMUs Regulatory Review of RFI Workplan Addendum 5 Response to Regulatory Comments on RFI Workplan Addendum 5 Final RFI Workplan Addendum 5, Group III SWMUs	Secondary	27 May 94	
	Secondary	14 Nov 94	12 Jan 95
Draft Group III RFI Report and Risk Assessment Regulatory Review of Group III RFI Report and Risk Assessment Response to Regulatory Comments on Group III RFI Report and RA Final Group III RFI Report and Risk Assessment	Primary	2 Feb 96	
	Primary	31 May 96	
Draft Group III CMS Report Regulatory Review of Group III CMS Report Response to Regulatory Comments on Draft Group III CMS Report Final Group III CMS Report	Primary	12 Mar 96	
	Primary	10 Jul 96	
Group III RFA/SV (Confirmatory Sampling)			
Draft RFA/SV (Confirmatory Sampling) Workplan, Group III SWMUs Regulatory review and comments Response to Regulatory Comments Final RFA/SV Workplan, Group III SWMUs	Secondary	27 May 94	
	Secondary	14 Nov 94	12 Jan 95
Draft RFA/SV Report, Group III SWMUs Regulatory review and comments Response to Regulatory Comments Final RFA/SV Report, Group III SWMUs	Secondary	1 Feb 96	
	Secondary	29 May 96	
Group IV RFI (Contingent on results of Group IV RFA)			
Draft RFI Workplan Addendum 6, Group IV SWMUs Regulatory Review of RFI Workplan Addendum 6 Response to Regulatory Comments on RFI Workplan Addendum 6 Final RFI Workplan Addendum 6, Group IV SWMUs	Secondary	TBD	
	Secondary	TBD	
Draft Group IV RFI Report and Risk Assessment Regulatory Review of Group IV RFI Report and Risk Assessment Response to Regulatory Comments on Group IV RFI Report and RA Final Group IV RFI Report and Risk Assessment	Primary	TBD	
	Primary	TBD	
Group IV RFA/SV (Confirmatory Sampling)			
Draft RFA/SV (Confirmatory Sampling) Workplan, Group IV SWMUs Regulatory review and comments Response to Regulatory Comments Final RFA/SV Workplan, Group IV SWMUs	Secondary	18 Aug 95	
		8 Sep 95	
Draft RFA/SV Report, Group IV SWMUs Regulatory review and comments Response to Regulatory Comments Final RFA/SV Report, Group IV SWMUs	Secondary	18 Jul 96	
	Secondary	18 Nov 96	
Interim Measures SWMUs 2, 6/7, & 19			
Interim Measures Workplan submitted Interim Measures initiated Interim Measures Complete		13 May 94 Jan 95 Sep 95	26 Jul 94

TBD = To Be Determined based on results of Group IV RFA/SV