

U. S. DEPARTMENT OF ENERGY  
ROCKY FLATS PLANT  
ENVIRONMENTAL RESTORATION PROGRAM WEEKLY REPORT  
WEEK ENDING NOVEMBER 6, 1992

Section I - Interagency Agreement

OU 1 - 881 Assessment --

OU1, 881 Hillside, Draft RFI/RI Report Summary:

On October 28, 1992, the OU1, 881 Hillside, Draft RFI/RI Report was delivered to EPA and CDH, thus fulfilling DOE's IAG milestone obligation. The Draft RFI/RI Report was prepared in accordance with EPA Guidance and is based on findings from the 1991-92 field investigation. The field investigation was scoped and developed in the Work Plan, an IAG milestone document submitted to the Agencies in April 1991. The Draft RFI/RI Report will serve as a primary source of information for developing successor documents including the: CMS/PS, Proposed Remedial Action Plan, and Record of Decision.

Overall, the Draft RFI/RI Report indicates that the extent of contamination and the associated human and ecological risk are not as extensive as once regarded. Considering the absence of a significant groundwater migration pathway from IHSS 119.1 and the existence of the french drain/collector well system, the 881 Hillside poses a very low threat for contaminant migration offsite. As indicated, only in the hypothetical future-use residential setting does contamination at OU 1 present risk that could be considered unacceptable.

The Draft RFI/RI Report, which encompass 14 volumes, reports on the findings of comprehensive field investigations designed to assess the potential impacts of contamination arising from OU 1 to air, surface soils, subsurface soils, groundwater, surface water and sediments. Major findings detailed in the Draft RFI/RI Report include:

Groundwater contamination is localized to a relatively small area directly beneath IHSS 119.1. Significant groundwater contamination is limited to Volatile Organic Compounds (VOCs) some of which are present at concentrations exceeding regulatory compliance thresholds (e.g., carbon tetrachloride and perchloroethene are reported in the tens of parts-per-million range)

There exists very little actual "groundwater" beneath OU1 that is vulnerable to impact. The eastern portion of the site is characterized by generally dry conditions. Groundwater is seen to occur periodically as "wet zones" rather than saturated porous media subject to hydraulic forces. This is a major reason why contamination has not migrated beyond the general vicinity of IHSS 119.1. Additionally, aquifer and soil properties in the eastern portion of the site are not conducive to porous system flow. Traditional groundwater does exist on the western portion of the site, however, it is not significantly impacted by contamination. Water level measurements made since installation of the French Drain suggest that the western portion of OU1 is drying out similar to the eastern segment.

Surface soils have been impacted by polycyclic aromatic hydrocarbon (PAH) compounds. PAHs are fairly evenly distributed across the surface site. Their occurrence does not appear to be waste-activity related. Rather, PAHs in surface soils are probably the result of vehicular exhaust or possibly from the use of asphalt in nearby facilities such as

parking lots.

Local air, subsurface soils, sediments and surface waters in the South Interceptor Ditch (SID) and Woman Creek do not appear to be impacted by OU1.

The human health risk assessment findings demonstrate that:

Current offsite risks to the public and risks to onsite workers are well below the Agency's region of concern (i.e., well below 1E-6).

Risks to hypothetical future-use residents (e.g., residents homesteading right on OU1) range from 1E-5 to 1E-3. This range spans the typical to near worst-case spectrum. Interestingly, quantitative uncertainty analysis indicates that the range of uncertainty in these risk estimates spans approximately 3 to 5 orders of magnitude (1000 to 100,000). This may call into question the hypothetical future-use risk analysis as a reliable datum for decision making.

Risks to hypothetical future-use workers (including a research biologist) would be on the order of 1E-5 which is within the Agency's range of acceptability.

Findings of the Ecological Evaluation suggest that overall, contamination at OU 1 has not adversely impacted the local ecology. Several localized areas of concern were identified.

Work on the draft CMS/FS continued during the week. Initial effort will be directed toward refining ARARs and developing Preliminary Remediation Goals.

On October 13, 1992, RFO petitioned EPA and CDH for a 90-day extension on all IAG deliverables downstream of the Draft RFI/RI Report. Attainment of this extension is critical as FY93 funding assumes the extension, and the time will be needed to perform a quality job on the Draft CMS/FS-EA. Currently, the IAG milestone date for the Draft CMS/FS-EA is March 31, 1993; our schedule petition requested a date of June 30, 1993.

IRA Operations -- Tank 205 has been removed from service to allow for a routine internal inspection to check the tank's coating. Tanks are routinely inspected after discharge of treated water. The tank is scheduled to be returned to service before November 13, 1992.

Discharge of Effluent Tank 207 began October 26, 1992, and was completed on November 3, 1992 (97,500 gallons). The water was treated through the UV/Peroxide unit prior to discharge to remove any organics that might have leached into the water from the tank coatings. The regulatory agencies have granted permission to allow future discharge from effluent tanks without retreatment. The organic contamination from the tank coatings has been proven to be well below acceptable discharge levels.

The total treated groundwater collected is approximately 634,000 gallons, and the total discharged treated groundwater is approximately 602,500 gallons.

When the french drain was built on the 881 hillside, much of the vegetation was destroyed. At the request of EPA, a revegetation project was implemented, and the initial phase of seeding was very successful. During the week of November 6, 1992, the final phase of revegetation was scheduled to be completed, but will be delayed approximately one week due to the snowy weather. A native seed mix will be spread and approximately 100

trees (2' -4') will be planted on the hillside. The dying barley that was planted early in the summer will serve as a mulch for the new vegetation.

OU 2 - 903 Pad, Mound, East Trenches Area

Phase II RFI/RI Bedrock Work Plan -- RFO and EG&G met on October 27, 1992, to discuss alluvial, field work findings, and to identify tasks to be included in a revised Bedrock Work Plan. RFO and EG&G will present a revised bedrock scope to the regulatory agencies on November 9, 1992. A final schedule will be delivered to the regulatory agencies via a revised Phase II Bedrock Work Plan by March 1993.

Subsurface Interim Measure/Interim Remedial Action (IM/IRA) -- The Pilot Test Plan, *In Situ Volatilization Technology, Subsurface IM/IRA*, was delivered to the regulatory agencies on October 29, 1992, the added IAG milestone date. The plan, once approved, is scheduled to be implemented in September 1993. This is the first of three pilot test plans that will be implemented to gather test data in support of the remedial action decision. Data gathered by these three OU 2 pilot test plans will eventually enable a direct application of appropriate technologies to other OUs at RFP.

The Pilot Test Plan was also delivered to the TRG with a brief presentation on October 29, 1992. Review of the plan by the TRG is optional. If the TRG decides to comment on the document, they will submit comments to CDH approximately November 24, 1992. The TRG comments will be included in the agency comments which are due to RFO/EG&G on November 26, 1992. The final version of this first test plan is scheduled for submittal to EPA and CDH on January 12, 1993. Inspection and system startup to begin pilot testing in the field is scheduled for September 15, 1993.

Field Treatability Unit (FTU) - The field treatability unit collected, treated, and discharged 162,400 gallons of surface water during the week ending November 4, 1992. Operation was normal and without problems. A snowstorm on November 2, 1992 caused an increase in flow and turbidity. On November 4, 1992, two (2) drums of sludge were generated for a total of three (3) drums since October 1, 1992.

RFP personnel continue to study the FTU effluent with the Hiac/Royco particle counting equipment. Final phases of the test are being concluded. The testing is being conducted in accordance with the experimental plan and is going well. A meeting is planned for November 13, 1992 with RFO and EG&G personnel to discuss current activities of the FTU.

All the sludge and filter sock drums were transferred from the FTU 90-day storage area to the interim storage area (Unit 18.04). However, the four granular activated carbon (GAC) Cyclosoorb Units located at the 90-day storage area will remain until permission is obtained from the On-Site Transportation Committee to relocate these units to Unit 18.04.

The bench scale equipment (Memtek Unit and Reverse Osmosis [RO] Unit) have been transferred from the Protected Area (PA) to the FTU. The equipment will be set up within the GAC trailer, and a work plan will be developed to conduct bench scale studies.

OU 3 - Offsite Releases -- Soil trench sampling was completed on October 28, 1992. Approximately 40 surface soil sampling locations remain to be sampled along with the air sampling to complete OU 3 field work.

A meeting to discuss the Great Western Reservoir Management Plan was held October 29, 1992 with RFO and City of Broomfield representatives. This plan

will define the future land use of Great Western Reservoir under the Option B Program. Under Option B, the reservoir will be drained to expose the sediments. Currently no CERCLA actions are scheduled or budgeted past the RFI/RI Report. This change in land use will most probably require CMS/FS activities to be conducted, and depending upon the risk scenario required, some remediation may be evaluated. The short-term effect will be to increase the uncertainty and complexity of the Baseline Risk Assessment in the RFI/RI Report.

EG&G is drafting a letter to RFO to request guidance on direction to follow with landowners who refuse to allow access for field sampling.

OU 4 - Solar Evaporation Ponds -- RFO and EG&G comments for the Vadose Zone Characterization Technical Memorandum are being incorporated into the plan. The TM is expected to be finalized November 11, 1992 and submitted to EPA and CDH on November 13, 1992.

Surveying in sample locations and borehole locations was initiated on November 6, 1992 for the buffer zone area of OU 4.

OU 5 - Woman Creek -- Work on the HPGe survey stopped because of inclement weather and will resume after the snow melt. The geophysical surveys, EM and Magnetometer, are still in progress at IHSS 133. The drill rig which arrived on November 2, 1992 was inspected and drilling commenced below C1 Pond on November 3, 1992. One of the two planned wells below the dam of Pond C1 was not drilled due to its position in an area of potential habitat for the threatened species "Spiranthes Diluvialis". It is expected that this well will be drilled during drilling activities at the old landfill.

The first sampling event of Technical Memorandum 1 (TM 1), *Revised Network Design -- Field Sampling Plan*, was implemented November 4, 1992 in the Woman Creek Drainage. This first sampling event was the synoptic sampling of Woman Creek at snow melt conditions. Twelve surface water sites and eight sediment sites were sampled and flow measured.

OU 6 - Walnut Creek -- Sediment sampling is 80 percent complete in the ponds (IHSS 142). Surface soil sampling is complete on the North Area Spray Field (IHSS 167.1) and the Triangle Area (IHSS 165). Soil boring is in progress on IHSS 167.1. Field sampling activities for the Environmental Evaluation are proceeding. The second drilling rig will go into service on November 7, 1992.

Discussions with EPA and CDH regarding TM 1, *Addendum to Final Phase I RFI/RI Work Plan*, will be held as soon as the schedule of all parties allows a meeting to be held.

OU 7 - Present Landfill -Field mobilization continues. Project personnel are moving equipment into the field trailer. A connex trailer is being used for additional equipment storage. A trailer space and electrical hookup is being setup for use by this project for the field gas chromatograph unit. This unit will support the soil gas survey and BAT sampling.

There was a meeting held with the RFO project manager and EG&G on October 30, 1992. The intent of this meeting was to update the RFO PM on the status of the project and to discuss issues pertaining to the risk assessment. The major issue was what policy DOE wants to establish with respect to exposure scenarios and risk calculations. If the DOE policy is not to challenge certain scenarios such as the onsite residential scenario with no institutional controls as unreasonable, then evaluation of a "matrix", or

several scenarios approach to risk calculations, will impact the overall costs for conducting risk assessments. On the other hand, negotiating for more reasonable scenarios may impact the overall schedule for a risk assessment. Since the risk assessment is on the critical path for the RFI/RI investigation, this may impact milestones.

OU 8 - 700 Area -- The Draft Final Phase I RFI/RI Work Plan was delivered to RFO on November 2, 1992, approximately two weeks earlier than originally scheduled. This extra time will allow RFO to review the work plan prior to final submittal to CDH and EPA on December 1, 1992. A comment review meeting is being scheduled with RFO and EG&G to go over the plan.

OU 9 - Original Process Waste Lines -- Due to the FY93 funding allocation, only a minimal level of effort for project management tasks will be performed on OU 9. These tasks include Administrative Record maintenance, weekly highlight preparation, monthly report review, ADS review baseline preparation, and FY94 work package preparation. It is being proposed to conduct OU 9 field work under the Industrial Area Interim Measure/Interim Remedial Action (IM/IRA).

OU 10 - Other Outside Closures -- Responses to work plan comments from the regulatory agencies were prepared and submitted to RFO on October 1, 1992. Due to the FY93 funding allocation, only a minimal level of effort for project management tasks will be performed on OU 10. It is being proposed to conduct OU 10 field work under the Industrial Area Interim Measure/Interim Remedial Action (IM/IRA).

OU 11 - West Spray Field -- A proposal was made to streamline the field sampling in OU 11. CDH commented on this proposal by stating that the minimum data necessary to support a No Further Action Justification (NFAJ) would be at the same level required to support a risk assessment. CDH agreed that limiting field operations to a single phase would be mutually beneficial. CDH also agreed to attend a scoping meeting with RFO and EG&G in early December to assist in developing an acceptable field sampling scope. The usability of the HPGc detector data for risk assessment is currently being investigated. If this data is not acceptable for risk assessment, then the applicability of this technique with respect to new streamlining guidance needs to be evaluated.

OU 12 - 400/800 Areas -- CDH and EPA comments on the Final Phase I RFI/RI Workplan were faxed to RFO during the week of November 2, 1992. The Work Plan is conditionally approved subject to resolution of the comments. Work Plan revision and comment responses are due no later than December 18, 1992. All previously scheduled activities for FY93 will be delayed due to limited FY93 funding, and all planned field work will be addressed in the proposed Industrial Area IM/IRA.

OU 13 - 100 Area -- The OU 13 Final Phase I RFI/RI Work Plan was submitted to the regulatory agencies on October 9, 1992, the IAG milestone date. Work on the Statement of Work (SOW) has been initiated, but the balance of previously scheduled field activities will be addressed in the proposed IA IRAP.

There has been no activity on this project during this past week. A phone conversation with Joe Schieffelin of the Colorado Department of Health on October 27, 1992 was placed to check on the progress of the review of the Final RFI/RI Work Plan for OU 13 submitted to CDH and EPA on October 9, 1992.

The agencies are expected to complete their review and provide comments and/or approval of the Work Plan by November 10, 1992. The Work Plan had been revised to reflect comments received on the Draft Work Plan (May 1992). Mr Schieffelin hinted that the Work Plan may not be approved until the question of ARARs and chemical benchmarks is resolved, the final SOP for the HPGe detector is approved, and minor changes to the Field Sampling Plan are made. The SOP for the HPGe had been submitted to the regulatory agencies for approval, but has since been returned with numerous comments. The request for changes to the Field Sampling Plan will probably include additional sampling resulting in an increase in scope. Work on the Statement of Work has been initiated, although the budget for this fiscal year is not sufficient to begin field activities. Summary information was generated for the year end review which stated that unless full funding (approximately \$4.5 million) is allocated for this project this fiscal year, the August 8, 1994 IAG milestone for the delivery of the Phase I RFI/RI report is in jeopardy even though no IAG milestones for this year will be missed.

OU 14 - Radioactive Sites --The Final Phase I RFI/RI Work Plan for OU 14, Radioactive Sites, is currently under review for approval by EPA and CDH. A response from the regulatory agencies is expected on November 17, 1992. All previously scheduled activities for FY93 will be delayed due to limited FY93 funding, and all planned field work will be addressed in the proposed Industrial Area IM/IRA.

OU 15 -- Inside Building Closures -- All regulatory agency comments were resolved on the OU 15 Draft Phase I RFI/RI Work Plan and it was submitted to the regulatory agencies on October 26, 1992, the IAG milestone date.

A walk-through tour of OU 15, Inside Building Closure IHSS, was scheduled for November 4, 1992, with DOE/RFO, EPA, CDH, and EG&G, but was postponed due to building access. Access requests are now being prepared and the tour is tentatively scheduled for November 11, 1992.

OU 16 - Low-Priority Sites -- The final No Further Action Justification (NFAJ) document was revised to incorporate comments from the regulatory agencies. The revised document was submitted to the regulatory agencies on October 16, 1992.

#### Other Activities

PA Decontamination Facility -- The protected area (PA) decontamination facility is scheduled for completion by December. Due to escalating subcontract costs, work has been stopped. A budget change proposal (BCP) has been initiated to transfer funds from the drum enclosure project to allow restart of the PA Decontamination Facility in time for a December 1, 1992 completion.

Landfill Decontamination Facility --Funding is inadequate for design and construction as currently planned, so an independent cost estimate is being undertaken, before Title II design begins.

Drum Storage Facility -- Title II design is complete, but the level of approved funding for 220K will not cover the estimated construction cost of 295K. An independent cost estimate is underway to see if factors causing cost increases can be identified and if methods to lower construction costs can be determined.

#### Program Management

Response to OMB Request -- The RFP ER Program response to an OMB request to DOE/EM regarding the changes to legal drivers associated with EM activities was prepared and submitted on October 28, 1992. IAG milestones, and the impact of any changes to milestone completion dates on the FY93 budget was the focus of the request. The response stated that the RFO FY94 funding request (contained in the FY94-FY98 Five-Year Plan) was not impacted because the plan anticipated approval of the changes and incorporated the changes into the plan. A revised response to the request will be submitted to HQ on November 6, 1992 along with responses to other OMB requests.

Response to Request from HQ for Visual Aids -- Effort continued on the assembly of materials to respond to a request from HQ for visual aids. The materials will be used for story boards to assist HQ staff in Congressional and Secretarial budget presentations and other public forums. Information was requested for the Pondcrete and Surface Water Projects and for the OU 1 and OU 2 IRAs.

Response to Request for Information from HQ -- Responses to a request from HQ for information on RFP Environmental Restoration Management (ERM) Program risk assessments and issues regarding analytical laboratory services and procurement delays were forwarded to HQ by RFO.

COMA Action Plans -- The final COMA Report on the RFP audit conducted March 16 through March 26, 1992 by the Office of Oversight and Self-Assessment, Division of Engineering and Cost Evaluation (EM-24) was received by RFP. Draft responses to the ten audit findings were completed and sent to EP&WR on November 3, 1992, two days before the due date of November 5, 1992.

Response to Request from HQ Regarding FY93 Funding Allocation to ADSS -- A preliminary table comparing Five-Year Plan, President's Budget and Work Package allocation of funds to ADSS with variance explanations was prepared and submitted to HQ. It is expected that we will have to respond to a detailed set of 19 questions from OMB regarding planned expenditures in FY93.

ER Cost Estimating Handbook -- Work has begun on creating an ER Cost Estimating Handbook. Tasks to create the handbook were identified and a tentative schedule for completion of the manual was established. Identification of existing estimating data to include in the book is being pursued.

## Section II - Pondcrete Activities

### Pondsludge (Halliburton effort)

HNUS efforts continue on the C Pond clarifier continue. HNUS moved equipment into tent 6 for winter storage and continued erection of the conveyor system. The HNUS schedule is being updated to include the C Pond processing train and all other activities scheduled through November 20, 1992. EG&G is updating the entire C Pond integrated schedule based on current work estimates.

Options are being developed for processing the sludge in the ponds. Options were brainstormed with RFO and EG&G last week and a schedule was established for presenting the results to HQ. The HQ pre-briefing is scheduled for November 9, 1992, and the actual briefing is scheduled for November 12, 1992. These options will also be discussed with the regulatory agencies the week ending October 30, 1992. RFO suggested several options including one scenario where Halliburton-NUS takes over the entire solidification program including program management. EG&G could not directly support the development of this option. RFO would have to develop the details and analysis of this option

with data provided by EG&G.

#### Program Management

EG&G has nearly completed the increased staffing of the Solar Ponds Program Office. To date, 24 positions have been filled. Also, a subcontract was awarded to ICF/Kaiser to independently review technical and cost aspects of the HNUS sludge solidification process. This subcontract is a supplemental contract for near-term evaluations to support DOE's decisions on the programs future.

#### Solar Ponds Water Management

Water management activities continue. The transfer of A Pond to B Pond was completed October 23, 1992, three days ahead of schedule. A detailed, integrated schedule was developed for all water management activities. The schedule includes completing the installation of the evaporators and modular tanks as well as the tests and reviews prior to startup.

A draft plan for the entire program for Building 910 evaporators and related systems was completed and submitted to RFO on October 29, 1992. The plan addresses the component checkout tests and individual systems operations tests already conducted or tests in progress, as well as the Licon-supplied equipment SO tests and integrated SO tests.

During a working session, the EG&G Water Management Test Team, consisting of personnel from Facilities Project Management, Waste Management Systems Engineering, Environmental Design Engineering, Instrumentation and Control Engineering, Waste Processing Support and the Solar Ponds Program Office, produced a work breakdown structure (WBS), a responsibility assignment matrix (RAM), and a logic diagram for the conduct of the integrated testing program for the Modular Tanks and Building 910. The final schedule for the program was produced on November 6, 1992.

A conference call was made among several principals involved in effecting a solution to the generator engine failures. The engine manufacturer answered questions which had been raised by statements made in the vendor's letters, and the vendor committed to delivering the final, comprehensive failure analysis by November 6, 1992. Approval in principle (with exception) of the vendor's solution approach has been transmitted to the vendor. This action allows the vendor to produce and deliver a detailed design and construction package for RFP review.

#### Pad Storage - Operations

The 750 Pad has been included in a RCRA permit request. Despite some question on the adequacy of secondary containment on the pad, it is important to begin permitting efforts since pond wastes must be stored at Rocky Flats for many years until a disposal site is available. A similar permitting effort must be initiated for the 904 Pad, but adequate aisle space must be available before permitting can begin. Obtaining the 750 Pad permit will enhance the plant's RCRA compliance, and support the Solar Ponds Program for any of the restructuring options.

#### Section III - Surface Water Management

RFO received permission from the Colorado Department of Health to transfer water from ponds B-1 and B-2 to pond A-2 for spray evaporation. CDH agreed to the transfer when the latest analysis of the water in ponds B-1 and B-2 showed the level of contaminants below the Safe Drinking Water Act Maximum Contaminant Levels (MCL). CDH used risk criteria based on the MCLs to determine if the transfer could be made.

The water levels in ponds B-1 and B-2 must be reduced to allow the rehabilitation of dam B-1 to be completed this winter. The Corps of Engineers has concluded that "the stability of dam B-1 is in serious danger and corrective action should be taken immediately".

RFO has responded to an October 22, 1992 letter from CDH and EPA which required immediate scoping and development of Interim Measures/Interim Remedial Actions (IM/IRA) for the management of water in the A series ponds, B series ponds, pond C-2 and the landfill pond. This letter was a follow-up the June 26, 1992 letter from EPA that stated pond water would be managed by IM/IRAs. The RFO response acknowledges the June 26, 1992 letter from EPA, points out that pond water discharges are in compliance with NPDES requirements, requests further clarification of the CDH/EPA requirements listed in the October 22 letter, and invokes the dispute resolution provided in the IAG. (A copy of the RFO response has been sent to headquarters.)

RFO decided to invoke the dispute resolution provision of the IAG because the requirements listed in the October 22 letter would require a large financial commitment, provide no environmental benefits and eliminate practical options for pond water management.

#### Section IV - Transition/Decontamination and Decommissioning

Detailed Statements of Work were received from Pacific Northwest Laboratory (PNL) to assist DOE RFO in D&D planning. These activities will begin as soon as the Statements of Work are approved.

#### Section V - Meetings

##### OU 2 903 Pad, Mound, East Trenches Area

Phase II REI/RI Bedrock Work Plan -- RFO and EG&G will present a revised bedrock scope to the regulatory agencies on November 9, 1992.

FTU -- A meeting is planned for November 13, 1992 with RFO and EG&G personnel to discuss current activities of the FTU.

OU 11 - West Spray Field -- CDH will attend a scoping meeting with RFO and EG&G in early December to assist in developing an acceptable field sampling scope. The usability of the HPGc detector data for risk assessment is currently being investigated. If this data is not acceptable for risk assessment, then the applicability of this technique with respect to new streamlining guidance needs to be evaluated.

Community Relations -- The monthly technical review group (TRG) meeting was held October 29, 1992. The OU 1 RI Report was described to the group and well as the OU 2 Pilot Test Plan. The next TRG meeting is scheduled for November 18, 1992 at the Westminster City Hall, 8:30-12:00 noon. The next ER Quarterly Public meeting will be held at the Marriott West Hotel on December 8, 1992, 7:00-9:00 p.m.

Pondcrete Meeting to Discuss FY93 Plans -- On November 9, 1992 RFO staff will meet with EM-40 to outline alternatives for the program in FY93. Following this meeting, a similar presentation will be made for EM-1.

#### Section VI - Future

Near Term FY93 IAG Table VI Milestones Scheduled for Delivery from BEO to EPA/CDH.

<u>OU</u>		<u>Milestones</u>	<u>Date</u>
<u>Due to EPA/CDH</u>			
*08	Submit Final Phase I RFI/RI Work Plan		Dec 1, 1992
01	Submit Final Phase III RFI/RI Report		Jan 4, 1993

\*extended from original IAG date of September 28, 1992, with approval from EPA/CDH.