

FT. McCLELLAN BCT MEETING MINUTES
 PARTNERING SESSION #31
 FT. McCLELLAN, AL
 DECEMBER 5 – 6, 2000

AGENDA ITEM	RESPONSIBILITY	NOTES
Check In Guest Introduction and Roles	Host: Ron Levy Leader: Recorder: Jeanne Yacoub	See Attendees List – Attachment A.
Ground Rules	BCT	Attachment B provides the ground rules established in October, 1997.
Agenda	BCT	The BCT revised the December agenda, and proceeded accordingly. Attachment C provides the draft January agenda. Attachment D provides the December meeting summary.
Accept Previous Minutes	BCT	The team reviewed the draft November minutes, and accepted the minutes with revisions as final.
Action Items	BCT	Action items were reviewed and updated, as indicated in Attachment D.
Long-Term Planning (BCP)	BCT	One of the main agenda items for the June, 1999 meeting was BCP discussions. The team had set the BCP aside pending resolution of some policy issues that required resolution prior to completion of the BCP. Now that the team has worked through the LUCAP issue, they are prepared to readdress the BCP. IT will prepare a draft for consideration in January. Attachment E provides the reporting and review schedule for the deliverables that will be part of the BCP master schedule.
Goals/Metrics Update	BCT	Goals and metrics remain on the agenda (Attachment C). The team began brainstorming this topic during the June, 1998 meeting, and also began development of preliminary goals for consideration by the group.

		Attachment G provides the DOD Measures of Merit for BRAC projects submitted by Lisa Kingsbury for group consideration in the development of project goals and metrics. David Smith also previously provided several handouts for the team to review in preparation for discussions on this topic.
Facilitator Observations	David Sanderson	David Sanderson attended his fifteenth meeting with the team this month. His notes and observations are provided at Attachment F.

ATTACHMENT A

LIST OF ATTENDEES
BCT SESSION #31
FT.McCLELLAN, AL
DECEMBER 5 – 6, 2000

Ron Levy, Ft. McClellan
Lisa Kingsbury, Ft. McClellan
Ellis Pope, Mobile District Corps of Engineers
Philip Stroud, Alabama Department of Environmental Management (ADEM)
Bart Reedy, US Environmental Protection Agency (EPA), Region IV
Doyle Brittain, US EPA Region IV
Dan Copeland, US Army Engineering and Support Center, Huntsville (CEHNC)
Suzanne Murdock, (CEHNC)
David Sanderson, Facilitator
Jeanne Yacoub, The IT Group
Steve Moran, The IT Group

Guests:

Miki Schneider, Joint Powers Authority
Josh Jenkins, The IT Group
Troy Winton, The IT Group
Randy McBride, The IT Group

ATTACHMENT B
BCT GROUNDRULES

1. Start and finish meetings and breaks on time.
2. One person talks at a time.
3. Stay focused on the agenda.
4. Distribute minutes and meeting agenda two weeks in advance of meeting.
5. Avoid interruptions and side conversations.
6. Keep agenda to manageable size.
7. Do homework/come prepared.
8. Consensus decisions.
9. Clarify differences.
10. Rotate meeting locations among BCT representatives.
11. Rotate meeting leader.
12. Be courteous/tactful/honest/respectful.
13. BCT pre-approves all guests.
14. Support BCT decisions.
15. Seek to understand others' positions and styles.
16. Identify and agree upon issues/interactions, which are to be retained within the team.

ATTACHMENT C

AGENDA BCT MEETING OF JANUARY, 2001

1. Check In
2. Guest Introduction/Role in Meeting
3. Review Ground Rules (Attachment B to these minutes)
4. Finalize Agenda with additions and/or subtractions (Item 9 of this Attachment)
5. Accept Previous Meeting Minutes
6. Review Action Items from Previous Minutes (Attachment D to these minutes)
7. Review Long-Term Planning (BCP)
8. Goals/Metrics Update (Attachment G to these minutes)
9. Accomplish Agenda Items (Item 9 of this Attachment)
10. Meeting Summary Review
 - Set next meeting date
 - Set next meeting agenda
 - Set time and date for conference call
 - Set meeting dates for next six months
 - Review action and consensus items
 - Review and evaluate Partnering Process

ITEM #9
DRAFT JANUARY AGENDA

Wednesday, January 10, 2001

0800 – 0830	Check-in	BCT w/David
0830 – 0900	Finalize Minutes/Agenda/ Action Items	BCT
0900 – 0930	Huntsville Safety and CWM Specialists	Jimmy/Betina
0930 – 1000	Scrap Metal Update	Suzanne
1000 – 1130	OE EE/CA Characterization Strategy	Huntsville
1130 – 1230	Lunch	
1230 – 1630	Team Building Exercise	David

Breaks as Needed
Dinner Plans

Thursday, January 11, 2001

0800 – 1000	JPA Update	Miki
1000 – 1100	LUCIPs	BCT
1100 – 1200	SI Reports DRMO Area, Parcel 85(7) Former Motor Pool Area 1300, 4 th Avenue, Parcels 148(7), and 16(7) Former Motor Pool Area 600, Parcels 149(7), and 136(7) Former Printing Plant Building 1060, Parcel 172(7) Former Gas Mask Test Chambers, Parcels 195(7), 196(7), and 198(7)	BCT
1200 – 1300	Lunch	
1300 – 1600	SI Work Plans Ranges West Of Iron Mountain Road, Parcels 181(7), 194(7), 73Q-X, 91Q-X, 114Q-X, 115Q, 116Q-X, 117Q-X, 129Q-X, 151Q, 200Q, 201Q, 228Q, 229Q-X, 231Q, 232Q-X, Washington Tank Range, and 1950 Rocket Launcher Range Artillery and Mortar Impact Areas South of Bains Gap Road, Parcels 138Q-X, 139Q-X, 140Q-X, 141Q-X, and 142Q-X	BCT
1600 – 1700	Meeting Reflections	BCT

Parking Lot Items

Meeting Management	Goals and Metrics
➤ Agenda Setting	Tier II Involvement
➤ Break Configurations	

ATTACHMENT D

MEETING SUMMARY

With ACTION ITEMS

Next Meeting: January 10 - 11, 2001
Ft. McClellan, AL

Primary Agenda: UXO Issues, SI Reports/Work Plans, Team Processes

December Meeting Summary:

Finalize Agenda and Minutes - The BCT reviewed the November minutes, made some clarifying revisions, and accepted them as final. The group also added the following items to the agenda:

- Groundwater Issue OE Scrap Location
- M2 Certification New Fill Areas
- "Hot Potatoes" LUCAP Signing Logistics
- UST Follow-Up Site-Wide UXO Work Plan
- NGB Coordination Rad Status
- Team Process C&D Landfill

Action Items - The BCT reviewed November's action items, and updated them. The updates are presented in Attachment D.

Check-In - This meeting served as a transition meeting from Bart, as EPA's RPM, to Doyle Brittain, who is taking Bart's place on the BCT.

Landfill #3 Structural Geology - Josh presented the results of the structural geological investigation that IT conducted this past summer, including the data from the 3 deep borings, and the downhole geophysical logging efforts (acoustic televiewer logging, natural gamma logging, caliper logging, and resistivity logging). IT's interpretation is that the data suggests an unmapped fault is present west of, and adjacent to landfill #3. Josh presented a cross-section of the inferred fault. IT geologists used this data to site proposed wells that will help determine whether potential groundwater contamination (1,1,2,2-TCA, and TCE) is migrating offsite from the landfill. IT will install 3 well clusters, each consisting of a bedrock well (175 - 200' depth) and a residuum well (approximately 100' depth), and 3 bedrock wells adjacent to existing residuum wells. IT will conduct downhole geophysics on the 3 bedrock wells within the clusters. IT will also do another private well survey, and will review any existing pumping/well testing data from the two wells belonging to the City of Weaver.

QST Data - Randy gave an update on the QST data pertaining to several SI sites for which IT will prepare SI reports. His technical memo is attached at Appendix H. After listening to Randy's assessment of the data, the BCT decided to check with AEC to ascertain whether or not the data packages would be available. Randy, Ron, and Ellis called QST and learned that QST had sent complete Level IV data packages to AEC. They also

learned whom at AEC to contact for the data, and placed a call to that individual, but did not reach them. Randy indicated he would follow-up with AEC the following day to make arrangements to have the data sent to IT's Knoxville office. Randy will evaluate the data, and provided the packages are complete, IT will validate the data, and manually enter it into the Ft. McClellan database. If those steps can occur, then IT will be able to develop data reports for the QST sites that are consistent with all the other SI sites. IT will provide another status update at the next BCT meeting.

Old Incinerator Building 5710 (Parcel 125) - The projected reuse for this parcel is passive recreation. The data show low levels of dioxins. IT recommended NFA with a LUCIP. Doyle suggested an interim removal vs. a LUCIP because it might be faster and cheaper to collect a few more samples, draw a "clean line," and perform a "dig and haul." Steve pointed out that this parcel is very close to Landfill #2, the CDTF buffer, the ASP, and the fill area north of the ASP, none of which are likely to be released by the Army for unrestricted reuse. The relative proximity of all these parcels may also make it difficult to draw a "clean line" around this parcel. Ron would like IT to rebrief the Old Incinerator at the next BCT. He will discuss the issue with TRADOC and others.

Former Smoke Area South Slope of Morgan Mountain (Parcel 159) - This parcel is located within state property in the Choccolocco Corridor. The data show iron, aluminum, and eight of nine samples show chromium. IT recommended NFA with no restrictions for reuse. Philip suggested collecting a few samples outside the parcel area; if chromium occurs, it is likely geologic. He further suggested that IT send the draft SI report and let him talk to some ADEM representatives about the site. The BCT agreed to have IT collect further surface and subsurface samples in the area, but away from the parcel. IT will recommend the number of samples to be collected.

Trenches West of Remount Creek (Parcel 228) - This parcel was identified from 1949 aerial photography, near the intersection of 14 and 15 Streets. IT recommended NFA with unrestricted reuse. The BCT accepted this recommendation.

LUCAP Signing Logistics - The LUCAP signing ceremony will take place on December 12, at Building 61, behind the building near the flagpole. The JPA is issuing formal invitations. They will also sign the MOA for the Economic Development Conveyance.

M2 Removal Report - Foster Wheeler has almost completed their response to EPA's evaluation of their previous responses to comments on the M2 Removal Report. Ron indicated to Suzanne that he wants to review the responses before finalizing the document.

JPA Update - Miki Schneider joined the meeting on the morning of the second day for an update on parcel status and BCT business. She introduced herself to Doyle and explained the reason for her attendance.

Miki inquired about the status of M2. Lisa indicated that the FOST was sent to TRADOC on November 27, and that the installation's goal is to have TRADOC's signature by December 11. Ft. McClellan received Huntsville's statement of clearance, the M2 Certification, on December 5. Miki inquired if the fact that this is the first property transferred with unresolved EPA comments would cause the Army to refuse to sign the FOST or put Huntsville back in the field. She would like a copy of Huntsville's response to EPA's latest round of comments. Lisa will provide the comment responses and a copy of the M2 certification to Miki.

Miki informed the BCT that the JPA is pursuing environmental insurance, and the underwriters are very concerned about USTs. She asked if Ft. McClellan has any information on USTs that she can provide to the insurance underwriters. Jeanne will provide Miki with a copy of the UST Summary Report and a copy of the UST Closure Assessment Report.

Miki indicated that the JPA is talking to the NGB about switching properties located at the Gas Mask Test Chambers, since that is the only area where the JPA can site an industrial park. Miki will update the BCT next month on the status of those discussions.

On the basis of a site walk, the fill area at T-38 appears to be one to two acres in size. It will need a new parcel number. The BCT decided to inspect this area after lunch; Miki will also join the group in the visit.

Miki spent some time following up on issues raised at the last BCT meeting. She sent out a memo to the JPA staff informing them of the BCT's request that any plans for groundwater well installations be disclosed/discussed with the BCT. She also indicated that the JPA is very concerned about the possibility of placing contaminated soils in the C&D landfill, since the City of Anniston has indicated an interest in assuming the Army's permit and continuing operations at the landfill.

The JPA has filed a legal brief responding to the suit against them. Their response requests that the suit be separated into two separate parts; the first one dealing with the JPA's legal authority to transfer property. The Anniston Star has joined the JPA in the lawsuit. The second part would deal with the individual who is claiming expenses because the JPA rejected his bid for property.

LUCIPs - Lisa mentioned that the January agenda needs to include LUCIPs, specifically who will prepare LUCIPs? Can the LUCIP for Bldg. 256 (GSA area) can be started?

Eastern Bypass Action Memo - Suzanne explained that Huntsville divided the Eastern Bypass property into 3 "Ordnance Operable Units (OODs)". The southernmost piece has no history of any ordnance operations. This will also be the first piece turned over to ALDOT. The Eastern Bypass EE/CA recommended education for construction workers and construction support. Huntsville wants to change the recommendation for OOU 1, the southernmost part, to reflect its lack of ordnance history and the fact that it is surrounded by Category 1 properties. The Action Memorandum will reflect this strategy.

Site-Wide Work Plan (UXO) - Huntsville needs Norrell's comments on this plan so that they can get going on various UXO site-specific work plans.

OE Scrap Location - Foster Wheeler needs a place to put their OE scrap. Karen Pinson is concerned that if the scrap is moved off the ranges, it becomes solid waste subject to RCRA Subtitle C requirements. Doyle's position is that once an OE item is spent, it is scrap metal and can be disposed according to provisions in 40 CFR 265. Suzanne will update the BCT on this issue next month.

UST Follow-Up - The draft UST Closure Assessment Report can be issued as final due to Philip's visit to the UST sites on November 29.

Rad Status - During a peer review in 1997, the team recommended an historical rad assessment. From that recommendation, Ft. McClellan identified several commodity sites. The installation then did a commodity

sites survey on 17 of the sites. They did a second survey on the remaining 12 sites. Ft. McClellan has concurrence from EPA, NRC, and ADEM on the first 17 sites (NFA). The only comment from EPA on the second report is a concern about a hot spot at Lenlock Community Center. Ft. McClellan's contractor (ATG) says it's a high background reading. EPA and ADEM want a cleanup. Lisa explained that if cleanup occurs it will happen within the FUDS program, not BRAC, since Lenlock has been out of the Army's possession since the 1970s. Lisa will set up a meeting after results of the aerial survey are available. Doyle will talk to Rick Button about the issue. Lisa needs written comments on ATG's report.

C&D Landfill - Doyle suggested that disposal options be kept open for the C&D landfill. He also requested that Ft. McClellan not dig up anything without talking to him first, since RCRA may kick in.

Fill Area at T-38 - Suzanne will have Jim Walker take a digital photograph and have Huntsville's CWM specialists examine it. If IT investigates the site, IT will prepare a work plan to perform an SI. Doyle wants the drums sampled.

Groundwater - ADEM requires anyone who wants to put in a well to obtain a permit. Philip checked with ADEM about the necessity for a groundwater LUCIP. ADEM thinks it is not necessary, since the permitting process will protect groundwater resources.

NGB Coordination - During the October BCT meeting, Ron requested that we separate NGB sites, and give the NGB a site status report. The BCT scheduled a meeting with the NGB on January 12, 2001 at 0800 to accomplish this request.

EPA Document Review - Doyle indicated that some of the documents are 99% reviewed, and just need a final QA check by EPA to get sent. The BCT will meet on January 8 starting at 1300 through January 9 to perform reviews of all outstanding SI documentation.

Team Process - David wants 4 hours of January agenda time to update Meyers-Briggs information, examine the Mission Statement, and review ground rules with the BCT.

Future Meetings - January 10 - 11, Ft. McClellan, February 7 - 8, Salt Lake City.

Status of Action Items

Action Item No.	Responsible Team Member	Due Date	Status	Action Item
00/11/1	Ron	Dec 00	SNR	Ron to call "Dig Safe" agency to coordinate UXO notification requirements.
00/11/2	Dave Sk.	Dec 00	Done	Provide IT with Huntsville's schedules for inclusion in the BCP Master Schedule.
00/11/3	Jeanne	Dec 00	Done	Provide a list of Decision Documents that have already been finalized that will not be changed retroactively to reflect parcel recategorization.
00/11/4	Steve	Dec 00	SNR	Provide update on QST data issue, and progress made to date to resolve issues.
00/11/5	Steve	Dec 00	Done	Provide Miki (and BCT) with status on properties M1.05.33, UST at Bldg. S-55, M1.07.15/167 USTs at Former WAC Museum, M15.154 Ground scars off Littlebrandt Rd. (QST Parcel).
00/11/6	Philip	Dec 00	Done	Research groundwater withdrawal issue at ADEM and report back to BCT.
00/12/1	Lisa	Jan 01	SNR	Provide Miki with a copy of Huntsville's response to EPA comments, and a copy of the M2 certification.
00/12/2	Jeanne	Jan 01	SNR	Provide Miki with a copy of the UST Summary Report and the UST Closure Assessment Report.
00/12/3	Suzanne	Jan 01	SNR	Provide BCT with update on OE Scrap disposal issue.

*SNR=Status Next Report

ATTACHMENT E

FORT McCLELLAN DELIVERABLES SCHEDULE

Parcel Number	Description	Recipient	Report	Draft	Comments	Comment Response	Final
FORMER FIRE TRAINING PIT							
7(7)	UST	JPA	SI	16-Jun-00	16-Jul-00	26-Jul-00	23-Aug-00
77(7)	FORMER FIRE TRAINING PIT	JPA	SI	16-Jun-00	16-Jul-00	26-Jul-00	23-Aug-00
AST AT RANGE 16							
177(7)	AST AT RANGE 16	JPA	SI	31JAN00A	03APR00A	28-Apr-00	26-May-00
FORMER TRANSFORMER NEAR BLDG 3798							
57(Q)	FORMER TRANSFORMER NEAR BLDG 3798	JPA	SI	31JAN00A	03APR00A	28-Apr-00	26-May-00
AUTOCRAFT SHOP/FORMER DPDO (BLDG 1800)							
100(7)	AUTOCRAFT SHOP/FORMER DPDO (BLDG 1800)	JPA	SI	7-Jul-00	11-Aug-00	21-Aug-00	18-Sep-00
152(7)	FORMER DPDO PARCEL	JPA	SI	7-Jul-00	11-Aug-00	21-Aug-00	18-Sep-00
20(7)	UST AUTOCRAFT SHOP	JPA	SI	7-Jul-00	11-Aug-00	21-Aug-00	18-Sep-00
241(7)	UST FORMER MOTOR POOL NORTH OF DPDO	JPA	SI	7-Jul-00	11-Aug-00	21-Aug-00	18-Sep-00
47(7)	UST AUTOCRAFT SHOP	JPA	SI	7-Jul-00	11-Aug-00	21-Aug-00	18-Sep-00
FORMER MOTOR POOL @ AREA 1800/1900							
145(7)	FORMER MOTOR POOL @ AREA 1800/1900	JPA	SI	12-May-00	11-Jun-00	21-Jun-00	19-Jul-00
48(7)	BOWLING ALLEY BUILDING 1928 (UST)	JPA	SI	12-May-00	11-Jun-00	21-Jun-00	19-Jul-00
52(7)	UST BUILDING 1997 1800/1900 MOTOR POOL	JPA	SI	12-May-00	11-Jun-00	21-Jun-00	19-Jul-00
GSA AREA AND SURROUNDING WAREHOUSES							
111(7)	MULTICRAFT SHOP BLDG 245 (DEMOLISHED)	JPA	SI	12-May-00	11-Jun-00	20-Jun-00	18-Jul-00
128(7)	WASHRACK AT NIELSEN ST	JPA	SI	12-May-00	11-Jun-00	20-Jun-00	18-Jul-00
129(7)	WASHRACK NEAR BUILDING T-222			12-May-00	11-Jun-00	20-Jun-00	18-Jul-00
151(7)	GSA AREA AND SURROUNDING WAREHOUSES	JPA	SI	12-May-00	11-Jun-00	20-Jun-00	18-Jul-00
2(7)	UST GSA MOTOR POOL BUILDING 238	JPA	SI	12-May-00	11-Jun-00	20-Jun-00	18-Jul-00
GSA AREA AND SURROUNDING WAREHOUSES							
238(7)	UST FORMER GAS STATION NEAR BLDG 234	JPA	SI	12-May-00	11-Jun-00	20-Jun-00	18-Jul-00
4(7)	UST POL POINT GSA AREA	JPA	SI	12-May-00	11-Jun-00	20-Jun-00	18-Jul-00
67(7)	FORMER BATTERY MAINT. BLDG. 234 GSA	JPA	SI	12-May-00	11-Jun-00	20-Jun-00	18-Jul-00
69(7)	WASHRACK BUILDING 232	JPA	SI	12-May-00	11-Jun-00	20-Jun-00	18-Jul-00
91(7)	FORMER DRY CLEANING AREA BUILDING T-233	JPA	SI	12-May-00	11-Jun-00	20-Jun-00	18-Jul-00
PRINTING PLANT BLDG 143 BASEMENT							
138(7)	PRINT PLANT BLDG 143 BASEMENT	JPA	SI	21FEB00A	28-Apr-00	13-May-00	12-Jun-00
FORMER PRINTING PLANT BLDG 144							
171(7)	FORMER PRINT PLANT BUILDING 144	JPA	SI	17FEB00A	03APR00A	28-Apr-00	26-May-00
SOTS							
102(7)	SOTS SITE	NG	RR	26-Jun-00			28-Aug-00
FORMER SHELL TAPPING AREA							
201(7)	FORMER SHELL TAPPING AREA	NG	RR	26-Jun-00			28-Aug-00

RANGE K: FORMER AGENT TRAINING AREA							
203(7)	RANGE K: FORMER AGENT TRAINING AREA	NG	RR	26-Jun-00			28-Aug-00
FORMER ANNISTON ARMY DEPOT SHELL TAPPING AREA							
208(7)	FORMER ANNISTON ARMY DEPOT SHELL TAPPING	NG	RR	26-Jun-00			28-Aug-00
FILL AREA NORTH OF LANDFILL NO. 2							
230(7)	FILL AREA NORTH OF LANDFILL NO. 2	JPA	SI	30-Jun-00	30-Jul-00	9-Aug-00	6-Sep-00
POST GARBAGE DUMP NORTH OF REILLY AIRFIELD							
126(7)	POST GARBAGE DUMP NORTH OF REILLY AIRFIE	PR	SI	30-Jun-00	30-Jul-00	9-Aug-00	6-Sep-00
FILL AREA EAST END REILLY AIR FIELD							
227(6)	FILL AREA EAST END REILLY AIR FIELD	PR	SI	30-Jun-00	30-Jul-00	9-Aug-00	6-Sep-00
FILL AREA NORTHWEST OF REILLY AIR FIELD							
229(7)	FILL AREA NORTHWEST OF REILLY AIR FIELD	PR	SI	30-Jun-00	30-Jul-00	9-Aug-00	6-Sep-00
PROBABLE FILL AREA AT RANGE 30							
231(7)	PROBABLE FILL AREA AT RANGE 30	JPA	SI	30-Jun-00	30-Jul-00	9-Aug-00	6-Sep-00
FILL AREA WEST OF RANGE 19							
233(7)	FILL AREA WEST OF RANGE 19	JPA	SI	30-Jun-00	28-Jul-00	9-Aug-00	6-Sep-00
STUMP DUMP							
82(7)	STUMP DUMP	USFWS	SI	30-Jun-00	30-Jul-00	9-Aug-00	6-Sep-00
EE/CA RANGES AT BAINES GAP ROAD							
77(Q)	RANGE 21: TRAINFIRE (FIELD FIRE) RANGE	JPA	EE/CA	29-Sep-00	3-Nov-00	13-Nov-00	11-Dec-00
78(Q)	RANGE 22: ZERO RANGE-SMALL ARMS (25M)	JPA	EE/CA	29-Sep-00	3-Nov-00	13-Nov-00	11-Dec-00
79(Q)	RANGE 23: TRAINFIRE (RECORD) RANGE	JPA	EE/CA	29-Sep-00	3-Nov-00	13-Nov-00	11-Dec-00
83(Q)	RANGE 25KD	JPA	EE/CA	29-Sep-00	3-Nov-00	13-Nov-00	11-Dec-00
84(QX)	RANGE 26: LIVE FIRE AND MANEUVER RANGE	JPA	EE/CA	29-Sep-00	3-Nov-00	13-Nov-00	11-Dec-00
85(Q)	RANGE 27: STRESS PISTOL AND SHOTGUN RANG	JPA	EE/CA	29-Sep-00	3-Nov-00	13-Nov-00	11-Dec-00
87(QX)	RANGE 29 WEAPONS DEMO AREA			29-Sep-00	3-Nov-00	13-Nov-00	11-Dec-00
EE/CA FOR LANDFILLS							
126(7)	POST GARBAGE DUMP NORTH OF REILLY AIRFIE	JPA	EE/CA	7-Dec-00	11-Jan-01	21-Jan-01	18-Feb-01
175(5)	INDUSTRIAL LANDFILL	JPA	EE/CA	7-Dec-00	11-Jan-01	21-Jan-01	18-Feb-01
227(6)	FILL AREA EAST END REILLY AIR FIELD	JPA	EE/CA	7-Dec-00	11-Jan-01	21-Jan-01	18-Feb-01
229(7)	FILL AREA NORTHWEST OF REILLY AIR FIELD	JPA	EE/CA	7-Dec-00	11-Jan-01	21-Jan-01	18-Feb-01
230(7)	FILL AREA NORTH OF LANDFILL NO. 2	JPA	EE/CA	2-Dec-00	6-Jan-01	16-Jan-01	13-Feb-01
231(7)	PROBABLE FILL AREA AT RANGE 30	JPA	EE/CA	7-Dec-00	11-Jan-01	21-Jan-01	18-Feb-01
233(7)	FILL AREA WEST OF RANGE 19	JPA	EE/CA	7-Dec-00	11-Jan-01	21-Jan-01	18-Feb-01
78(6)	LANDFILL NO. 1	JPA	EE/CA	7-Dec-00	11-Jan-01	21-Jan-01	18-Feb-01
79(6)	LANDFILL NO. 2	JPA	EE/CA	7-Dec-00	11-Jan-01	21-Jan-01	18-Feb-01
80(6)	LANDFILL NO. 3	JPA	EE/CA	7-Dec-00	11-Jan-01	21-Jan-01	18-Feb-01
81(5)	LANDFILL NO. 4	JPA	EE/CA	7-Dec-00	11-Jan-01	21-Jan-01	18-Feb-01
82(7)	STUMP DUMP	USFWS	EE/CA	7-Dec-00	11-Jan-01	21-Jan-01	18-Feb-01
EE/CA FOR RANGES AT IRON MOUNTAIN ROAD							
69(Q)	SKEET RANGE	JPA	EE/CA	9-Jun-00	14-Jul-00	24-Jul-00	21-Aug-00
70(Q)	RANGE 12	JPA	EE/CA	9-Jun-00	14-Jul-00	24-Jul-00	21-Aug-00
71(Q)	RANGE 13	JPA	EE/CA	9-Jun-00	14-Jul-00	24-Jul-00	21-Aug-00
75(Q)	RANGE 19	JPA	EE/CA	9-Jun-00	14-Jul-00	24-Jul-00	21-Aug-00

GROUND SCARS/BOILER PLANT							
101(7)	BOILER PLANT NO. 4, BUILDING 1876	JPA	SI	8-Sep-00	13-Oct-00	23-Oct-00	20-Nov-00
153(7)	GROUND SCAR SOUTH OF BUILDING 3134	JPA	SI	6-Oct-00	10-Nov-00	20-Nov-00	18-Dec-00
154(7)	GROUND SCAR/TRENCHES	JPA	SI	13-Oct-00	17-Nov-00	27-Nov-00	25-Dec-00
155(7)	GROUND SCAR/PIT	JPA	SI	20-Oct-00	24-Nov-00	4-Dec-00	1-Jan-01
156(7)	GROUND SCAR NEAR THE ASP	JPA	SI	13-Oct-00	17-Nov-00	27-Nov-00	25-Dec-00
157(7)	GROUND SCAR SOUTH OF THE AUTOCRAFT SHOP	JPA	SI	6-Oct-00	10-Nov-00	20-Nov-00	18-Dec-00
158(7)	GROUND SCAR @ SOUTH END OF CONFIDENCE CO	JPA	SI	20-Oct-00	24-Nov-00	4-Dec-00	1-Jan-01
26(7)	BOILER PLANT NO. 1, BUILDING 3176	JPA	SI	8-Sep-00	13-Oct-00	23-Oct-00	20-Nov-00
501(7)	BUILDINGS AT REILLY AIRFIELD	JPA	SI	27-Oct-00	1-Dec-00	11-Dec-00	8-Jan-01
86(7)	CONTRACTOR LAYDOWN AREA	JPA	SI	29-Sep-00	3-Nov-00	13-Nov-00	11-Dec-00
GROUND SCARS/BOILER PLANT							
90(7)	CHEMICAL SCHOOL LABORATORY SUMP, BLDG. 2	NG	SI	15-Sep-00	27-Oct-00	6-Nov-00	4-Dec-00
96(7)	FORMER INCINERATORS, BLDGS. 4407 & 4428	JPA	SI	22-Sep-00	27-Oct-00	6-Nov-00	4-Dec-00
97(7)	FORMER SANDEL FLAMETHROWER AREA	JPA	SI	29-Sep-00	3-Nov-00	13-Nov-00	11-Dec-00
99(7)	FORMER TAR PLANT, BUILDING S-4437	JPA	RIWP	4-Aug-00	8-Sep-00	29-Sep-00	13-Oct-00
CWM SITES REMEDIAL INVESTIGATIONS							
180(7)	DETECTION AND IDENTIFICATION PARCEL	JPA	RIWP	15FEB00A	28-Apr-00	8-May-00	5-Jun-00
182(7)	RANGE T-5	JPA	RIWP	15FEB00A	28-Apr-00	8-May-00	5-Jun-00
183(7)	RANGE T-6 (NAYLOR FIELD)	JPA	RIWP	15FEB00A	28-Apr-00	8-May-00	5-Jun-00
188(7)	OLD TOXIC TRAINING AREA	JPA	RIWP	15FEB00A	28-Apr-00	8-May-00	5-Jun-00
CWM SITES REMEDIAL INVESTIGATIONS							
509(7)	AGENT ID AREA	JPA	RIWP	15FEB00A	28-Apr-00	8-May-00	5-Jun-00
511(7)	BLACKTOP TRAINING AREA	JPA	RIWP	15FEB00A	28-Apr-00	8-May-00	5-Jun-00
512(7)	FENCED YARD IN BLACKTOP AREA	JPA	RIWP	15FEB00A	28-Apr-00	8-May-00	5-Jun-00
513(7)	DOG TRAINING AREA	JPA	RIWP	15FEB00A	28-Apr-00	8-May-00	5-Jun-00
514(7)	OLD BURN PIT	JPA	RIWP	15FEB00A	28-Apr-00	8-May-00	5-Jun-00
516(7)	DOG KENNEL AREA	JPA	RIWP	15FEB00A	28-Apr-00	8-May-00	5-Jun-00
517(7)	CBR PROFICIENCY AREA	JPA	RIWP	15FEB00A	28-Apr-00	8-May-00	5-Jun-00
CWM SITES REMEDIAL INVESTIGATIONS							
186(7)	RANGE T-38	JPA	RIWP	28FEB00A	28-Apr-00	8-May-00	5-Jun-00
CWM SITES REMEDIAL INVESTIGATIONS							
518(7)	SOUTH GATE TOXIC GAS YARD	JPA	RIWP	21-Jun-00	30-Jun-00	10-Jul-00	7-Aug-00
CWM SITES REMEDIAL INVESTIGATIONS							
181(7)	RANGE T-4	JPA	RIWP	4-Jul-00	8-Aug-00	18-Aug-00	15-Sep-00
CWM SITES REMEDIAL INVESTIGATIONS							
184(7)	RANGE T-31	JPA	RIWP	4-Jul-00	8-Aug-00	18-Aug-00	15-Sep-00
515(7)	FIELD PERSONNEL DECONTAMINATION AREA	JPA	RIWP	5-Jul-00	9-Aug-00	19-Aug-00	16-Sep-00
INDOOR PISTOL RANGES REMOVAL (4 RANGES)							
16(Q)	INDOOR PISTOL RANGES, BUILDING 141	JPA	DD	10APR00A	15-May-00	26-May-00	1-Jun-00
217(Q)	INDOOR PISTOL RANGES, BUILDING 143	JPA	DD	10APR00A	15-May-00	26-May-00	1-Jun-00
WATERSHED SCREENING ASSESSMENT							
53(7)	WATERSHED SCREENING ASSESSMENT	JPA	WSA	6-Oct-00	10-Nov-00	20-Nov-00	18-Dec-00
FORMER ORDNANCE MOTOR REPAIR AREA							
41(7)	GENERAL PURPOSE BUILDING 303	DOJ	SI	25-Aug-00	22-Sep-00	6-Oct-00	1-Nov-00
42(7)	RECYCLING CENTER BUILDING 338	JPA	SI	25-Aug-00	22-Sep-00	6-Oct-00	1-Nov-00
5(7)	BUILDING 326 (FORMER OMRA)	JPA	SI	25-Aug-00	22-Sep-00	6-Oct-00	1-Nov-00

6(7)	RECYCLING CENTER BUILDING 338	JPA	SI	25-Aug-00	22-Sep-00	6-Oct-00	1-Nov-00
75(7)	FORMER ORDNANCE MOTOR REPAIR AREA	DOJ/JPA	SI	25-Aug-00	22-Sep-00	6-Oct-00	3-Nov-00
SMOKE AREA R							
105(7)	SMOKE AREA R	JPA	SI	13MAR00A	21-Jul-00	31-Jul-00	28-Aug-00
SMOKE AREA S							
106(7)	SMOKE AREAS S	JPA	SI	8-Sep-00	8-Oct-00	18-Oct-00	15-Nov-00
FORMER SMOKE AREA CHOCCOLOCCO CORRIDOR							
107(7)	FORMER SMOKE AREA CHOCCOLOCCO COORIDOR	JPA	SI	22-Sep-00	22-Oct-00	1-Nov-00	29-Nov-00
RANGE 24A MULIT-PURPOSE RANGE							
108(7)	RANGE 24A MULTI-PURPOSE RANGE	USFWS	RIWP	19-May-00	18-Jun-00	28-Jun-00	26-Jul-00
113(QX)	FORMER DEMOLITION AREA	JPA	RIWP	19-May-00	18-Jun-00	28-Jun-00	26-Jul-00
187(7)	FORMER CHEMICAL MUNITIONS DISPOSAL	USFWS	RIWP	19-May-00	18-Jun-00	28-Jun-00	26-Jul-00
RANGE 24A MULIT-PURPOSE RANGE							
88(7)	RANGE 24A FOG OIL DRUM STORAGE	USFWS	SI	8-Sep-00	8-Oct-00	18-Oct-00	15-Nov-00
FORMER FOG OIL STORAGE AREA W. OF SKEET RANGE							
122(7)	FORMER FOG OIL STORAGE WEST OF SKEET RAN	JPA	SI	4-Aug-00	3-Sep-00	13-Sep-00	11-Oct-00
SMOKE AREA BVZ							
124(7)	SMOKE RANGE BVZ	JPA	SI	8-Sep-00	8-Oct-00	18-Oct-00	15-Nov-00
OLD INCINERATOR BUILDING 5710							
125(7)	OLD INCINERATOR BUILDING 5710	JPA	SI	22-Sep-00	22-Oct-00	1-Nov-00	29-Nov-00
ENVIRONMENTAL BASELINE @ CDTF							
104(7)	CDTF INCINERATOR	DOJ	EB	14DEC99A	03APR00A	28-Apr-00	13-May-00
126(Q)	ENVIRONMENTAL BASELINE @ CDTF	DOJ	EB	14DEC99A	03APR00A	28-Apr-00	13-May-00
59(7)	UST AT BUILDING 4482 (CDTF)	DOJ	EB	14DEC99A	03APR00A	28-Apr-00	13-May-00
WASHRACK BLDG 1740 SOLDIERS CHAPEL							
127(7)	WASHRACK BUILDING 1740 SOILDER'S CHAPEL	JPA	RIWP	27-Oct-00	26-Nov-00	6-Dec-00	3-Jan-01
FORMER MOTOR POOL AREA 600 GMO							
136(7)	UST FORMER GAS STATION BUILDING 695	JPA	SI	9-Jun-00	9-Jul-00	19-Jul-00	16-Aug-00
149(7)	FORMER MOTOR POOL AREA 600	JPA	SI	9-Jun-00	9-Jul-00	19-Jul-00	16-Aug-00
16(7)	FORMER GAS STATION @ AREA 13 BLDG 1394	NG	SI	9-Jun-00	9-Jul-00	19-Jul-00	16-Aug-00
QUARTER MASTER'S GAS STORAGE							
130(7)	QUARTER MASTER'S GAS STORAGE	JPA	SI	07MAR00A	14-Apr-00	24-Apr-00	22-May-00
MOTOR POOL AREA 1300 2ND AVE							
143(7)	MOTOR POOL AREA 1300 2ND AVE	NG	SI	21-Jul-00	20-Aug-00	30-Aug-00	27-Sep-00
FORMER MOTOR POOL AREA 3100 S OF 23RD ST							
147(7)	FORMER MOTOR POOL AREA 3100 S OF 23RD ST	PR	SI	9-Jun-00	7-Jul-00	19-Jul-00	16-Aug-00
27(7)	UST BUILDING 3196/3148 MOTOR POOL	PR	SI	9-Jun-00	7-Jul-00	19-Jul-00	16-Aug-00
FORMER MOTOR POOL AREA 3100 S OF 23RD ST							
28(7)	UST BUILDING 3196/3148 MOTOR POOL	PR	SI	9-Jun-00	7-Jul-00	19-Jul-00	16-Aug-00
72(7)	WASHRACK BUILDING 3146/3147	PR	SI	9-Jun-00	7-Jul-00	19-Jul-00	16-Aug-00

FORMER FUEL YARD							
131(7)	FORMER FUEL YARD	JPA	SI	16MAR00A	28-Jul-00	7-Aug-00	4-Sep-00
FORMER MOTOR POOL AREA 1000							
13(7)	UST GYM POOL BUILDING 1012	PR	SI	9-Jun-00	7-Jul-00	19-Jul-00	16-Aug-00
139(7)	FORMER GAS STATION AREA 1000	PR	SI	9-Jun-00	7-Jul-00	19-Jul-00	16-Aug-00
150(7)	FORMER MOTOR POOL AREA 1000	PR	SI	9-Jun-00	7-Jul-00	19-Jul-00	16-Aug-00
FORMER SMOKE AREA SOUTH SLOPE MORGAN MTN							
159(7)	FORMER SMOKE AREA SOUTH SLOPE MORGAN	JPA	SI	22-Sep-00	22-Oct-00	1-Nov-00	29-Nov-00
MOTOR POOL AREA 800							
11(7)	UST BUILDING 888 MOTOR POOL	JPA	SI	23-Jun-00	23-Jul-00	2-Aug-00	30-Aug-00
12(7)	UST BUILDING 894 MOTOR POOL	JPA	SI	23-Jun-00	23-Jul-00	2-Aug-00	30-Aug-00
164(7)	MOTOR POOL AREA 800	JPA	SI	23-Jun-00	23-Jul-00	2-Aug-00	30-Aug-00
68(7)	WASHRACK BUILDING 866	JPA	SI	23-Jun-00	23-Jul-00	2-Aug-00	30-Aug-00
PRINTING PLANT BLDG 3183							
162(7)	PRINT PLANT BUILDING 3183	JPA	SI	4-Aug-00	3-Sep-00	13-Sep-00	11-Oct-00
AREA 1600 MOTOR POOL							
163(7)	MOTOR POOL AREA 1600	JPA	SI	19-May-00	21-Jul-00	31-Jul-00	28-Aug-00
17(7)	VEHICLE MAINTENANCE SHOP	JPA	SI	19-May-00	21-Jul-00	31-Jul-00	28-Aug-00
18(7)	STORAGE BUILDING	JPA	SI	19-May-00	21-Jul-00	31-Jul-00	28-Aug-00
19(7)	FORMER GAS STATION BUILDING	JPA	SI	19-May-00	21-Jul-00	31-Jul-00	28-Aug-00
503(7)	VEHICLE MAINTENANCE BUILDING	JPA	SI	19-May-00	21-Jul-00	31-Jul-00	28-Aug-00
AREA 1600 MOTOR POOL							
504(7)	STORAGE BUILDING	JPA	SI	19-May-00	21-Jul-00	31-Jul-00	28-Aug-00
71(7)	WASH AREA, O/W SEPARATOR, GREASE RACKS	JPA	SI	19-May-00	21-Jul-00	31-Jul-00	28-Aug-00
TRAINING AIDS BUILDING 267							
166(7)	TRAINING AIDS BUILDING 267	JPA	SI	7-Jul-00	6-Aug-00	16-Aug-00	13-Sep-00
WASHRACK BUILDING 1294							
168(7)	WASHRACK BUILDING 1294	NG	SI	21-Jul-00	20-Aug-00	30-Aug-00	27-Sep-00
WASHRACK AT BUILDING 351							
170(7)	WASHRACK AT BUILDING 351	JPA	SI	16-Jun-00	16-Jul-00	26-Jul-00	23-Aug-00
FORMER PRINTING PLANT BLDG 1060							
172(7)	FORMER PRINTING PLANT BUILDING 1060	NG	SI	21-Jul-00	20-Aug-00	30-Aug-00	27-Sep-00
FORMER PRINT PLANT BUILDING 2051							
173(7)	FORMER PRINT PLANT BUILDING 2051	JPA	SI	5-May-00	4-Jun-00	14-Jun-00	12-Jul-00
SMALL WEAPONS CLEANING & STORAGE BLDG 1378							
174(7)	SMALL WEAPONS CLEANING/STORAGE BLDG 1378	NG	SI	21-Jul-00	20-Aug-00	30-Aug-00	27-Sep-00
GOLF COURSE							
141(7)	GOLF COURSE PESTICIDE MIX/STORAGE BLDG.	PR	SI	26-May-00	23-Jun-00	7-Jul-00	21-Jul-00
178(7)	GOLF COURSE	PR	SI	26-May-00	23-Jun-00	7-Jul-00	21-Jul-00
83(7)	GOLF COURSE PESTICIDE MIX/STORAGE BLDG.	PR	SI	26-May-00	23-Jun-00	7-Jul-00	21-Jul-00
PERSONNEL DECONTAMINATION STATION BLDG 3185							
179(7)	PERSONNEL DECON STATION BUILDING 3185	JPA	SI	4-Aug-00	3-Sep-00	13-Sep-00	11-Oct-00

FORMER GAS MASK TEST CHAMBERS BLDG 439							
195(7)	GAS MASK TEST BLDGS T-401, T-402, & 439	NG	SI	7-Jul-00	6-Aug-00	16-Aug-00	13-Sep-00
196(7)	FORMER GAS MASK TEST CHAMBERS BLDG 439	NG	SI	7-Jul-00	6-Aug-00	16-Aug-00	13-Sep-00
198(7)	FORMER CS TRAINING AREA	NG	SI	7-Jul-00	6-Aug-00	16-Aug-00	13-Sep-00
ASP							
197(7)	ASP	JPA	SI	16-Jun-00	16-Jul-00	26-Jul-00	23-Aug-00
199(7)	BUILDING 4416 AT ASP	JPA	SI	16-Jun-00	16-Jul-00	26-Jul-00	23-Aug-00
GROUND SCAR W/ PROB TRENCHES @ DRIVING COURSE							
200(7)	GROUND SCAR W/PROB TRENCHES @ DRIVING CO	JPA	SI	14-Jul-00	13-Aug-00	23-Aug-00	20-Sep-00
RANGE J							
202(7)	RANGE J	NG	RIWP	23-Feb-01	25-Mar-01	4-Apr-01	2-May-01
RIDEOUT FIELD							
202(Q)	RIDEOUT FIELD	NG	GWR	23-Feb-01	25-Mar-01	4-Apr-01	2-May-01
TRENCHES WEST OF REMOUNT							
228(7)	TRENCHES WEST OF REMOUNT CREEK	JPA	SI	11-Aug-00	10-Sep-00	20-Sep-00	18-Oct-00
AREA 45/WEAPONS DEMONSTRATION AREA							
232(Q)	AREA 45/WEAPONS DEMONSTRATION AREA	JPA	SIWP	TBD	TBD	TBD	TBD
M2	M2 PARCEL SITE	JPA	SI	31-May-00	20-Jun-00	30-Jun-00	7-Jul-00
DRAIN FIELD							
236(Q)	DRAIN FIELD	JPA	SI	14-Jul-00	13-Aug-00	23-Aug-00	20-Sep-00
CLEARED AREA WITH MOUND CHOCCOLOCCO CORRIDOR							
237(7)	CLEARED AREA WITH MOUND CHOCCOLOCCO	JPA	SI	1-Sep-00	1-Oct-00	11-Oct-00	8-Nov-00
TRENCH NEAR RANGE 20 FIRING LINE							
239(7)	TRENCHES NEAR RANGE 20 FIRING LINE	USFWS	SI	28-Jul-00	27-Aug-00	6-Sep-00	4-Oct-00
240(7)	TRENCHES NEAR RANGE 20 FIRING LINE	USFWS	SI	28-Jul-00	27-Aug-00	6-Sep-00	4-Oct-00
OLD HOSPITAL							
95(7)	OLD HOSPITAL	DOJ/JPA	SI	28-Jun-00	26-Jul-00	2-Aug-00	23-Aug-00
FORMER MOTOR POOL AREA BLDG 1398 4TH AVE							
148(7)	FORMER MOTOR POOL AGEAR BLDG 1398 4TH AV	NG	SI	28-Jun-00	28-Jul-00	7-Aug-00	4-Sep-00
TRENCHES WEST OF IRON MOUNTAIN ROAD							
500(7)	TRENCHES WEST OF IRON MOUNTAIN ROAD	JPA	SIWP	19-May-00	21-Jul-00	31-Jul-00	28-Aug-00
BULK STORAGE AREA BLDG 296							
60(7)	BULK STORAGE AREA BUILDING 296	JPA	SI	28-Jul-00	27-Aug-00	6-Sep-00	4-Oct-00
11TH CHEM MOTOR POOL & UST							
29(7)	11TH CHEM MOTOR POOL & UST	JPA	SI	2-Jun-00	3-Jul-00	12-Jul-00	11-Aug-00
30(7)	UST. BLDG. 3298 MOTOR POOL 11TH CHEM	JPA	SI	2-Jun-00	3-Jul-00	12-Jul-00	11-Aug-00
74(7)	WASHRACK BUILDING 3262	JPA	SI	2-Jun-00	3-Jul-00	12-Jul-00	11-Aug-00
FORMER PCP DIP TANK DEH COMPOUND							
1(7)	UST BUILDING 202/215 DEH COMPOUND	JPA	SI	27-Oct-00	26-Nov-00	6-Dec-00	3-Jan-01
64(7)	FORMER PCP DIP TANK DEH COMPOUND	JPA	SI	27-Oct-00	26-Nov-00	6-Dec-00	3-Jan-01
64A(7)	WASHRACK BLDG 214 DEH COMPOUND	JPA	SI	27-Oct-00	26-Nov-00	6-Dec-00	3-Jan-01

64B(7)	PESTICIDE MIX/STORAGE FACILITY BLDG 211	JPA	SI	27-Oct-00	26-Nov-00	6-Dec-00	3-Jan-01
64C(7)	HERBICIDE STORAGE FACILITY BLDG 208	JPA	SI	27-Oct-00	26-Nov-00	6-Dec-00	3-Jan-01
FORMER SMALL WEAPONS REPAIR SHOP BLDG 335							
66(7)	FORMER SMALL WEAPONS REPAIR SHOP BLDG 33	JPA	RIWP	28-Jun-00	26-Jul-00	9-Aug-00	30-Aug-00
FORMER DECON COMPLEX BLDG 1271, 1272							
140(7)	FORMER GAS STATION @ BUILDING 1294	JPA	SI	3-Dec-00	2-Jan-01	12-Jan-01	9-Feb-01
46(7)	UST DECON FAC BULDG. 1271	NG	SI	3-Dec-00	2-Jan-01	12-Jan-01	9-Feb-01
70(7)	WASHRACK BUILDING 1298	NG	SI	3-Dec-00	2-Jan-01	12-Jan-01	9-Feb-01
93(7)	FRM DECON COMPLEX BLDG 1271, 1272 (70)	NG	SI	3-Dec-00	2-Jan-01	12-Jan-01	9-Feb-01
DRMO AREA							
85(7)	DRMO AREA	JPA	SI	1-Sep-00	1-Oct-00	11-Oct-00	8-Nov-00
WASTE CHEMICAL STORAGE AREA							
10(7)	WASTE CHEMICAL STORAGE AREA UST	NG	SI	19-May-00	18-Jun-00	28-Jun-00	26-Jul-00
135(7)	FORMER GAS STATION AT BLDG 594	NG	SI	19-May-00	18-Jun-00	28-Jun-00	26-Jul-00
87(7)	WASTE CHEMICAL STORAGE AREA (87 & 10)	NG	SI	19-May-00	18-Jun-00	28-Jun-00	26-Jul-00
FORMER MOTOR POOL AREA 2000							
137(7)	FORMER GAS STATION AREA	JPA	SI	9-Jun-00	9-Jul-00	19-Jul-00	18-Aug-00
144(7)	FORMER MOTOR POOL AREA 2000	JPA	SI	9-Jun-00	9-Jul-00	19-Jul-00	18-Aug-00
FORMER MOTOR POOL AREA 3100							
146(7)	FORMER MOTOR POOL AREA 3100	JPA	SI	9-Jun-00	9-Jul-00	19-Jul-00	16-Aug-00
212(7)	UST BUILDING 3138 AREA 3100 MOTOR POOL	JPA	SI	9-Jun-00	9-Jul-00	19-Jul-00	16-Aug-00
24(7)	FORMER MOTOR POOL AREA 3100	JPA	SI	9-Jun-00	9-Jul-00	19-Jul-00	16-Aug-00
25(7)	UST BUILDING 3138 AREA 3100 MOTOR POOL	JPA	SI	9-Jun-00	9-Jul-00	19-Jul-00	16-Aug-00
73(7)	WASHRACK BUILDING 3142	JPA	SI	9-Jun-00	9-Jul-00	19-Jul-00	16-Aug-00
FORMER CHEM LAUNDRY & MOTOR POOL AREA 1500							
132(7)	UST FORMER GAS STATION BLDG 15 MOTOR POO	JPA	RIWP	2-Aug-00	30-Aug-00	13-Sep-00	4-Oct-00
133(7)	UST FORMER GAS STATION BLDG 1494 AREA 14	JPA	RIWP	2-Aug-00	30-Aug-00	13-Sep-00	4-Oct-00
134(7)	FORMER GAS STATION BLDG 1594 AREA 15	JPA	RIWP	2-Aug-00	30-Aug-00	13-Sep-00	4-Oct-00
94(7)	FORMER CHEM LAUNDRY & MOTOR POOL AREA 15	JPA	RIWP	2-Aug-00	30-Aug-00	13-Sep-00	4-Oct-00
ECOLOGICAL SCREENING CHAPTER							
ECO	ECOLOGICAL SCREENING CHAPTER	JPA	IWWP	11-Aug-00	10-Sep-00	20-Sep-00	18-Oct-00
HISTORIC RANGES PACKAGE 1 (Dates TBD)							
119(QX)	FORMER MAIN POST IMPACT AREA	JPA	SIWP	TBD	TBD	TBD	TBD
120(QX)	FORMER MAIN POST IMPACT AREA	JPA	SIWP	TBD	TBD	TBD	TBD
138(QX)	IMPACT AREA, MORTAR RANGE VICINITY	JPA	SIWP	TBD	TBD	TBD	TBD
139(QX)	IMPACT AREA, MORTAR RANGE VICINITY	JPA	SIWP	TBD	TBD	TBD	TBD
140(QX)	IMPACT AREA, MORTAR RANGE VICINITY	JPA	SIWP	TBD	TBD	TBD	TBD
141(QX)	IMPACT AREA, MORTAR RANGE VICINITY	JPA	SIWP	TBD	TBD	TBD	TBD
142(QX)	IMPACT AREA, MORTAR RANGE VICINITY	JPA	SIWP	TBD	TBD	TBD	TBD
HISTORIC RANGES PACKAGE 10 (Dates To Be Confirmed)							
131(QX)	IMPACT AREA LOCATED BETWEEN 145QX & 146Q	JPA	SIWP	8-Dec-00	12-Jan-01	22-Jan-01	19-Feb-01
143(Q)	RANGE 40 AREA	JPA	SIWP	8-Dec-00	12-Jan-01	22-Jan-01	19-Feb-01
144(QX)	RANGE 40 AREA	JPA	SIWP	8-Dec-00	12-Jan-01	22-Jan-01	19-Feb-01
145(QX)	RANGE 40 AREA	JPA	SIWP	8-Dec-00	12-Jan-01	22-Jan-01	19-Feb-01
146(Q)	RANGE 40 AREA	JPA	SIWP	8-Dec-00	12-Jan-01	22-Jan-01	19-Feb-01
147(QX)	IMPACT AREAS RANGE 40 AREA	JPA	SIWP	8-Dec-00	12-Jan-01	22-Jan-01	19-Feb-01
148(QX)	IMPACT AREAS RANGE 40 AREA	JPA	SIWP	8-Dec-00	12-Jan-01	22-Jan-01	19-Feb-01

UST CLOSURE ASSESSMENT							
167(7)	WAC MUSEUM BUILDING 1077 (UST)	JPA	CR	17-Jul-00	7-Jul-00	21-Jul-00	25-Aug-00
21(7)	BASE SERVICE STATION AT BUILDING 2109 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
22(7)	BASE SERVICE STATION AT BUILDING 2109 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
3(7)	TELEPHONE EXCHANGE AT BUILDING 251 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
31(7)	AMMUNITION SUPPLY POINT, BUILDING 4400 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
33(7)	FORMER BUILDING S-55 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
34(7)	FITNESS CENTER BUILDING 128 (UST)	PR	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
35(7)	FIELD HOUSE BUILDING 130 (UST)	PR	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
36(7)	ADMINISTRATIVE BUILDING AT BLDG. 141 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
37(7)	ADMINISTRATIVE BUILDING AT BLDG. 143 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
38(7)	BIVOUAC AREA B-44 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
39(7)	FORMER CLOTHING BUILDING, BLDG. 273 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
40(7)	NOBLE ARMY HOSPITAL, BUILDING 294 (UST)	HHS	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
43(7)	FORMER BUILDING 796 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
44(7)	FORMER BUILDING 1201 (UST)	NG	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
45(7)	FORMER BUILDING 1202 (UST)	NG	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
49(7)	DENTAL CLINIC BUILDING 1929 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
50(7)	PX, BUILDING 1965 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
502(7)	BUILDING 1338 (UST)	NG	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
505(7)	BUILDING 3179 (UST)	NG	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
506(7)	BUILDING 3691 (UST)	NG	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
51(7)	POST OFFICE BUILDING 1966 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
54(7)	BARRACKS BUILDING 3131 (UST)	PR	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
55(7)	HEADQUARTERS BUILDING 3161 (UST)	PR	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
56(7)	COMMUNITY CLUB BUILDING 3212 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
57(7)	RECREATION CENTER BUILDING 3213 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
58(7)	CHAPEL BUILDING 3293 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
63(7)	PERSONNEL BUILDING 162 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00
9(7)	RECREATION BUILDING AT BUILDING 503 (UST)	JPA	CR	17-Jul-00	7-Jul-00	22-Jul-00	21-Aug-00

ATTACHMENT F

FACILITATOR NOTES AND OBSERVATIONS

Meeting Summary

The December 5-6 meeting of the BCT at Ft. McClellan marked a major transition for the team. Dan Copeland from Huntsville and Doyle Brittain from the EPA formally joined the team as David Skridulis and Bart Reedy left. Bart attended the first day to help with the transition; Ron attended only the first day because of a commitment on December 6; and Suzanne and Dan were absent for some of the second day because the agenda did not involve them. These are my observations about some of the important transactions:

Commitments: During the check-in, Doyle said that he would honor prior agreements and decisions that Bart had participated in. At the end of the meeting, all those present expressed their commitment to consensus decision-making and their support of decisions once made.

Mutual support: Lisa brought for Doyle and the whole team a complete list of current documents, and throughout the meeting she built a high-priority list of documents for Doyle's initial attention.

Changes in BCT procedures: At Doyle's suggestion, the team agreed to an on-board document review in January in order to clear the backlog. He also indicated his wish to manage EPA's document review as the sole contact point for the rest of the team and his hope that he can streamline the response process to avoid multiple reviews.

Resolving issues: Philip reported on his research into the site-wide groundwater issue, concluding that sufficient controls over future well-drilling are already in place. The team was clearly relieved, and this helped to avoid a potential conflict. On the other hand, two of the three recommendations from IT about specific parcels were tabled for further work and discussion—a useful way to deal with uncertainty, though we will have to see how these are finally resolved.

Managing conflict: IT's conclusion that data from QST was at best questionable and perhaps unusable made for a rocky time. We can learn from what happened. Ron, upset at the possible waste of money, responded first by trying to place blame. Ellis refused to be brought into that discussion and did not try to defend himself. Bart named what was happening and urged everyone to look at the problem and find a way to manage it. Eventually, as members talked about the issue and particularly how to evaluate the data, the team arrived at a plan which Ellis and Ron put into immediate action. As usual, the problem was one for the entire team, not just one member, and though it took a while the whole team did contribute to finding a way to manage it—and it did so by itself, without my intervention.

Straight talk, and a commitment to teambuilding: At the end of the meeting, the members who were present had an important discussion about the team's ground rules and behavior, and they agreed to continue the discussion at the January meeting when the whole team is present. The conversation set a precedent, I hope, for more straight talk in the future, though team members know that it is more challenging when the whole team is together. A recommitment to ground rules is important; equally important is a genuine acceptance of one another, which helps every team member understand others and forgive occasional lapses rather than make any one team member the team's "problem."

ATTACHMENT G

DOD MEASURES OF MERIT FOR CONSIDERATION IN THE DEVELOPMENT OF PROJECT GOALS AND METRICS

The following DOD Measures of Merit under the BRAC Program (provided by Lisa Kingsbury) may provide a starting point for consideration in the development of goals and metrics for the Ft. McClellan project. Lisa's Email of 12/10/97 listed numerous Measures of Merit for various programs; the BRAC Program Measures of Merit are listed below:

MoM1: Relative Risk Reduction

The number of sites that are classified as high, medium, and low relative risk, and as RC or NFA

MoM2: Restoration

The number of acres that are transferable from DOD's control according to the requirements of CERCLA

MoM3: Compliance

The number of acres for which closure-related compliance projects have been completed

MoM4: Planning

The number of acres that have completed the environmental analysis and decision documents for disposal and reuse of property that are required under the National Environmental Policy Act (NEPA)

ATTACHMENT G

REFERENCES FOR CONSIDERATION IN THE DEVELOPMENT OF GOALS AND METRICS

- Region 4 Partnering Success Stories
- Hurlburt AFB Metric No. 1, Summary of IRP Site Status
- Compilation of Metrics Input

ATTACHMENT G
 RESULTS OF BRAINSTORMING ON GOALS AND METRICS
 JUNE 6, 1998

<u>Success Stories</u>	<u>Outcomes</u>	<u>Goals/metrics</u>
SSSLs	Cost Avoidance	SIs Completed
Background Metals	Documents Reviewed	RAs
Partnering Innovations	Decision Documents	Remedy in Place
Real Time Reviews	-- RODs	Acres Transferred
Synergistic Scoping	-- NFAs	Acres Investigated
	-- Action Memos	Site Closures
	-- ETC (?)	\$ Saved
	Time Savings	“Walk Away” Cleanups
	Scope Savings	(minimal deed restrictions)
		Document Review Time

<u>Time</u>	<u>Money</u>	<u>Property (for transfer)</u>
Doc Review – Lisa	Document Submittals	Acres – Lisa
-- Baseline		-- Transferable
		-- Investigated
		-- Remediated
Contracts in Place – Ellis	Generic Work Plan – Jeanne	Parcels – Lisa
Meetings – Ron/Lisa	SOW – Ellis	Buildings – Lisa
Investigations – Chris	Background Metals – Chris	Decision Documents – Lisa
Identify Opportunities	GIS/GPS – Ron	FOST/FOSL – Ron
for Early Remediation	SSSL – Jeanne	SI
SOW – Ellis		Reuse Phases Available



Technical Memorandum

To: Jeanne Yacoub, Steve Moran, Troy Winton
CC: Duane Nielsen, Kelly Jones, Jonathan Remo
From: Randy McBride
Date: December 4, 2000
RE: QST Data Usability Assessment

We have completed our review of the data that was submitted in the QST report, *Draft Site Investigation Report Fort McClellan, Alabama*, January 1999. The following information summarizes what we reviewed (Section 1.0), how we reviewed it (Section 2.0), and what we determined from the review (Section 3.0). My recommendations are included in Section 4.0.

1.0 Data Sources

We evaluated data usability for the three individual data sources for the site investigation (SI) report that QST has provided:

- Data summary tables in main text (SI Report, Tables 5-1 through 5-17)
- Analytical data (SI Report, Appendix E)
- Installation Restoration Data Management Information System (IRDMIS) historical data (retrieved electronically from the United States Army Environmental Center [USAEC], November 2000)

The SI data summary tables consist of a list of the samples with parameters and their concentrations that were detected in concentrations above the laboratory method detection limit (MDL). The tables are sorted by matrix and by analytical method for each site. Examples of the data summary tables (Tables 5-4, 5-6, 5-7, and 5-11) are included in Attachment 1 of this technical memo.

The SI analytical data in Appendix E consist of a table that includes the regular field samples, field duplicate, and blank results. The results include all the parameters analyzed for and their concentrations (or reporting

limit) sorted by site, location, matrix, and analytical method. If a parameter was not detected it was listed in the table with a “<” symbol placed before a reporting limit (RL). Examples of the analytical data presented in Appendix E (from sites SI06 and SI07) are included in Attachment 2 of this technical memo.

The IRDMIS electronic data was transferred from the USAEC to IT via Structured Query Language (SQL) commands by IT database personnel. Once the data was transferred, minor adjustments were made to format certain fields of information to be more consistent with the IT Environmental Management System (ITEMS) project-required styles. From this data, a spreadsheet was prepared that extracted all of the results (both detected and nondetected values) by site, by sample location, by matrix, and for each analytical method. Attachment 3 of this technical memo includes an example of this spreadsheet from sites SI06 and SI07.

No other sources of data (data packages, laboratory electronic data deliverables, e.g.) were identified or reviewed. No analytical backup data such as raw, instrument printouts, lab sheets, or forms are available. No quality assurance (QA) documentation including method accuracy or precision measurements (other than field duplicate results and blanks in Appendix E) are available for review.

2.0 Data Review

The data review process was performed in two stages, Stage I and Stage II. The Stage I data review included a comparison of the SI report data summary tables to the analytical data in Appendix E. This review included an accuracy check to verify that all values agreed and a completeness check to verify that all detected results were present in both tables. Stage II data review included a comparison of the analytical data in Appendix E to the electronic IRDMIS data. This review included both accuracy and completeness checks.

In their January 1999 Draft SI report, QST completed investigations and presented data on seventeen parcels. To facilitate the data review, representative parcels were selected that contained a variety of sample matrices and analytical methods that would encompass all of the SI activities performed and data reported by QST. The following summarizes which sites were selected for review:

Stage I Data Review Sites:

- QST Site SI04 - Parcel 101(7), Boiler Plant No. 4
- QST Site SI06 - Parcel 152(7), Former DPDO
- QST Site SI07 - Parcel 83(7), Golf Course Pesticide Mixing/Storage Facility
- QST Site SI11 - Parcel 97(7), Former Sandel Flamethrower Range

Stage II Data Review Sites:

- QST Site SI06 - Parcel 152(7), Former DPDO
- QST Site SI07 - Parcel 83(7), Golf Course Pesticide Mixing/Storage Facility

By selecting these sites only for review, we have effectively reviewed approximately 26% of the total data available in Stage I (74 samples reviewed of 280 total samples reported). Approximately 18% of the data available for Stage II was reviewed (51 samples of 280 total samples).

3.0 Findings

This section summarizes the findings from the Stage I and Stage II data review that was performed on the sites listed in Section 2.0.

Stage I, Finding 1 - Section 5 SI tables include more data (at lower concentrations) than what was reported in Appendix E. As shown in Exhibit A, Section 5 tables include many values that were reported below the reporting limits (RLs) shown in Appendix E. ***Inferred Rationale*** - The laboratory's method detection limit (MDL) were less than the RLs used in Appendix E. Section 5 tables must include values that were detected above the laboratory MDLs but were less than the Appendix E RLs. ***Usability Impact*** - For these low values, no confirming data source exists. (During Stage II, it was determined that these values were also excluded from the IRDMIS database). Using the IT SI reporting conventions, these data would be included in the human health and ecological risk based screening assessment discussion.

Stage I, Finding 2 - Section 5 SI tables combine the results of regular field samples and field duplicate quality control (QC) samples per location. As shown in Exhibit A, Section 5 tables combine the results of regular field samples and field duplicates from the same locations as "equivalent" samples. ***Inferred Rationale*** - The highest concentration from either sample is included in the presentation of data summarized in Section 5 tables and the lower concentration result is suppressed when the same parameter was detected in both samples. ***Usability Impact*** - Treating the regular sample and field duplicate sample results as "equivalent" potentially biases the overall SI results higher. At these locations where field duplicate QC samples were collected, two sets of data exist and due to sampling and analytical precision, in some cases parameters were detected in one sample and not in the other. When both data sets are used and the lower values are not reported, values that are lower than the Appendix E RLs are no longer available for use (See Stage I, Finding 1). Using the IT SI reporting conventions, field duplicate data are treated as a precision measurement for QA purposes and are evaluated in the data validation report section. They are not combined for reporting.

Stage I, Finding 3 - Section 5 Tables and Appendix E data are not an exact match. In addition to Stage I, Finding 1 discussion, several examples were found where the Section 5 table data did not match the Appendix E data. These examples include:

Parameter Names

- “molecular sulfur” [Table 5-4] not in Appendix E
- 1,1-dichloroethene, 1,2-dichloroethene, total dichloroethenes, [Table 5-4] not in Appendix E

Concentrations

- Site SI04, Sample SS02B, results for aluminum (8180 mg/kg), total xylenes (0.011 mg/kg) [Table 5-4]
- Site SI06, Sample SS13, results for acetone (0.33 mg/kg), methyl ethyl ketone (0.026 mg/kg) [Table 5-6]
- Site SI06, Sample SED01, results for benzo(k)fluoranthene (0.23 mg/kg - 0.22 mg/kg originally reported) [Table 5-6]

Other Reporting Issues

- Data in Section 5 tables that was not reported due to possible holding time exceedance (Site SI06, Sample SS15DUP) [Table 5-6]
- Sample numbering inconsistent (Site SI06, Samples SED01, SED01DUP) [Table 5-6] - two sets of results were labeled “SED01” in Appendix E and neither was identified as “SED01DUP”

Inferred Rationale - Section 5 table data and Appendix E data are drawn from two different sources or were prepared from the same data source at different times as the data were reviewed and prepared. ***Usability Impact*** - Appendix E cannot be used to conclusively provide a confirming data source for Section 5 table data.

Stage I, Finding 4 - Both Section 5 table and Appendix E data are not validated, as such no validation qualifiers are available. ***Inferred Rationale*** - Perhaps data validation was not part of the original scope or was not performed to conserve time or reduce cost. ***Usability Impact*** - All QST SI report data must be assumed to be valid, unbiased, usable. This may or may not be the case depending on the achievement of stated accuracy, precision, and representativeness data quality objectives. Without thorough data validation and evaluation the data may or may not be suitable for risk assessment screening. Under IT SI reporting conventions, 100 percent of the field samples are validated to Level III standards using Environmental Protection Agency (EPA) data validation protocols. Via the data validation process, data qualifiers are assigned, inserted into the ITEMS database for each parameter result, and reported along with the data in the SI report tables. Rejected data (“R” flagged) values are not used in risk assessment. Results that are qualified as estimated (“J” flagged) are discussed in the text prepared to discuss the risk screening.

Stage II, Finding 1 - Data downloaded from IRDMIS in November 2000 is missing results reported in Appendix E. Exhibit B includes the Appendix E results from QST site SI07 (Parcel 83[7], Golf Course Mixing and Storage Facilities). This exhibit shows volatile organic compound (VOC) data are not included in IRDMIS for soil samples SS02B, SS03B, SS04B, SS05A, SS05B soil sample results are missing from the corresponding IRDMIS printout (Exhibit C). For sample SS02B, two parameter results are given in IRDMIS

for 1,1,1-trichloroethane and 1,1,2-trichloroethane (both were not detected) however, no other parameters were listed in IRDMIS for this sample. **Inferred Rationale** - The data in the IRDMIS database is incomplete or data was not included or reported to IRDMIS because it did not meet data quality or usability requirements.

Usability Impact - Data supplied by IRDMIS cannot be used to conclusively provide a confirming data source for Appendix E data.

Stage II, Finding 2 - For the data that are available from IRDMIS (See Stage II, Finding 1), they do not match Appendix E. **Inferred Rationale** - Not only is the IRDMIS data set incomplete, but the data that is in the database appears not to match the Appendix E data. Specific examples include:

Parameter names

- SI06-SS03A, IRDMIS includes alpha-pinene - a parameter not included in Appendix E or in Section 5 tables
- SI06-SS04, IRDMIS includes palmitic acid - a parameter not included in Appendix E or in Section 5 tables
- SI06-SS06, IRDMIS includes benzo(e)pyrene, ergost-5-en-3-beta-ol, and beta-sitosterol - parameters not included in Appendix E or in Section 5 tables

Concentrations

- SI06-SS03A, alpha-chlordane - 0.0162 mg/kg (IRDMIS); 0.0156 mg/kg (Appendix E)
- SI06-SS03A, fluoranthene - 0.185 mg/kg (IRDMIS); 0.19 mg/kg (Appendix E)
- SI06-SS12, aluminum - 4780 mg/kg (IRDMIS); 4800 mg/kg (Appendix E); barium 24.5 mg/kg (IRDMIS); 24.8 mg/kg (Appendix E); beryllium - 0.323 mg/kg (IRDMIS); 0.325 mg/kg (Appendix E); calcium - 300 mg/kg (IRDMIS); 305 mg/kg (Appendix E); etc.
(many, many other examples exist of values that are close, but slightly different)

Other Reporting Issues

- Results in Appendix E reported as “< (RL)” and were detected in IRDMIS - example: SI06-SW01, bis(2-ethylhexyl)phthalate, HMX, methylene chloride (SW01DUP)
- Results in IRDMIS data listed as detected, but concentration was missing - example: gamma-chlordane for SI06-SS03B, SI07-SS02, SI07-SS01A, SI07-03A
- VOC results for SI07-SS01A should be labeled SI07-SS01ADUP; VOC results for SI07-SS02A should be labeled SI07-SS02ADUP

Usability Impact - IRDMIS data cannot be used to confirm the data in Appendix E even when the data is available from IRDMIS.

4.0 Conclusions and Recommendations

After evaluating the three sources of data provided by QST in support of their SI activities performed at Fort McClellan, it is my opinion that none of the sources can be used to confirm the other. Significant differences exist between the Section 5 table data and Appendix E data (Stage I, Findings 1, 2, and 3). The IRDMIS data do not confirm Appendix E data and are incomplete (Stage II, Findings 1 and 2).

Section 5 tables include low concentration data that were detected and should be included (Stage I, Finding 1); however, these data are unusable for risk assessment because the concentrations are not consistently reported (Stage I, Finding 2) and cannot be confirmed. The reported data should only be used if a complete data set can be provided either from IRDMIS or QST that matches Appendix E and can be used as a confirming data source.

Stage I, Finding 4 may provide the ultimate resolution to most, if not all, data usability issues. None of the QST SI report data have been data validated. If the data packages are available and complete, the data could be reviewed, validated, and usability would be confirmed against the FTMC QAP-defined “legally defensible” version of the data (i.e., the data package). Furthermore, validation qualifiers could be added to these historical data prior to risk assessment. All data would have to be manually entered and QC reviewed prior to use in risk screening, but as I see it, the only other alternative we can offer is to recollect the samples.