Scope of Work for
Remedial Action Work Plan
at the Hagen Farm Superfund Site
Stoughton, Wisconsin

I. PURPOSE

The purpose of the Scope of Work (SOW) is to detail the requirements for the continued implementation of the Hagen Farm Site (the Site) Records of Decision (RODs) which the United States Environmental Protection Agency (U.S. EPA) issued on September 17, 1990, and September 30, 1992, to select a remedial action for the Source Control Operable Unit (SCOU) and the Groundwater Control Operable Unit (GCOU) and the Explanations of Significant Differences (ESDs) which the U.S.EPA issued in April 1992 and on August 27, 1996. In designing, implementing, and submitting deliverables for the ongoing remedial action work at the Hagen Farm Site, the Settling Defendant shall follow this SOW, the appropriate U.S. EPA Superfund Remedial Design and Remedial Action Guidance, the RODs, ESDs, all approved Remedial Design (RD) and Remedial Action (RA) work plans, all U.S. EPA-approved Operation and Maintenance Plans, all additional approved plans, any additional guidance provided by U.S. EPA, and the provisions of the Consent Decree.

II. DESCRIPTION OF THE REMEDIAL ACTION

A. Overview of Site

The Hagen Farm Superfund Site is located at 2318 County Highway A, approximately one mile east of the City of Stoughton, Dane County, Wisconsin, and depicted generally on the map attached as Appendix L to the Consent Decree. The Site is defined as the area of contamination within the Hagen Farm property and the contaminant plume and all areas where hazardous substances disposed at the Hagen Farm Superfund Site have come to be located. (See, SCOU ROD at page 1-2 and Figure 2 of the SCOU ROD; GCOU ROD at pages 4-5 and Figure 3 of the GCOU ROD). The Hagen Farm property is approximately 28 acres in size. The area of contamination within the Hagen Farm property boundary is approximately ten acres in size and is fenced.

Two operable units have been defined for the Site. The ROD for Operable Unit I, which is the SCOU, is intended to address waste refuse and sub-surface soils at the disposal areas. The ROD for Operable Unit II, which is the GCOU, is intended to address the contaminated groundwater at the Site. This SOW details the work that is required in connection with ongoing remediation efforts for the entire Site.

The major components of the ongoing remediation efforts for the entire Site include maintenance of the Site fence, operation and maintenance of the landfill cap, operation and maintenance of the In-Situ Vapor Extraction System (ISVE), operation and maintenance of the Low-Flow Air Sparge System (LFAS), groundwater monitoring and reporting. A groundwater pump and treat system is present at the site and is shut down at this time while LFAS is evaluated for effectiveness. The Settling Defendant is required to initiate and/or accomplish the

remedial action efforts within the time periods specified herein and is required to submit reports as identified in Section III below.

B. Standards and Specifications

The performance standards and specifications of the major components of the ongoing remediation efforts for the Site, which shall be implemented by the Settling Defendant, are:

1. Fence Maintenance

The Settling Defendant shall continue to maintain the fencing surrounding the on-property area from the edge of the area of contamination (also referred to herein as the "disposal area") to Trunk Highway A (CTH A), as well as the off-property areas where treatment facilities are located, in order to reduce risks which may be posed to public health or the environment due to construction activities or exposure to hazardous chemicals during the cleanup process and also to protect treatment equipment from vandalism. The Settling Defendant shall promptly take necessary steps to protect against vandalism at the Site and to minimize and repair any vandalism to the fence or other security measures. The Settling Defendant shall annually inspect and maintain the fence to assure that the fence is intact and unbreached.

2. Groundwater Remediation and Monitoring

a. Air Sparge System Operation and Maintenance and Additional or Contingency Actions

The Site's groundwater pump and treat system is temporarily shut down. The LFAS is currently operating. The Settling Defendant shall continue to operate and maintain the as-built LFAS in accordance with U.S. EPA-approved plans, including the Settling Defendant's Low-Flow Air Sparge System Implementation & Monitoring Plan dated January 2001, and any modifications thereof.

If, at any time, U.S. EPA and/or WDNR determine that the LFAS cannot remove remaining groundwater contamination at an acceptable rate, then the Settling Defendant shall evaluate and implement appropriate measures to ensure the remedy continues to be protective of human health and the environment (hereafter "corrective measures"). Within sixty (60) days after written notification from U.S. EPA, Settling Defendant shall submit a written report outlining the results of its evaluation and propose measures to be taken for addressing the groundwater contamination in a reasonable period of time. Said report shall include an evaluation of corrective measures options (including but not limited to: re-implementing the existing pump and treat system, expanded pump and treat, source control or removal actions, and in-situ groundwater treatment methods), a schedule for completing proposed corrective measures, and a description of the monitoring program (if revised from the current plan) to track progress of remediating remaining contaminants in the groundwater. U.S. EPA, in consultation with WDNR, will approve, reject, or comment on the report. If U.S. EPA rejects or comments on the report, then Settling Defendant shall submit a revised report that is consistent with all

agency comments within thirty (30) days after receiving comments from U.S. EPA. Upon approval of the revised report by U.S. EPA, Settling Defendant shall implement all recommendations outlined in the approved report, including any approval conditions outlined by U.S EPA, in accordance with the schedule included in the report or established by U.S. EPA. If U.S. EPA determines that a ROD amendment or ESD is necessary to document the decision to conduct additional or revised remedial actions, then the final approval will be issued after the ROD amendment or ESD is completed.

If, after implementation of the approved report recommendations and agency conditions, U.S. EPA, in consultation with WDNR, determines that the additional actions are not sufficient to address remaining groundwater contamination at an acceptable rate, then the Settling Defendant shall repeat the process outlined in the previous paragraph to remediate the groundwater.

(1) Petition to Cease Operations

When the Settling Defendant believes that the LFAS, or any other groundwater restoration system operating at the site, has consistently met all groundwater cleanup standards at least over six (6) consecutive sampling rounds, the Settling Defendant shall submit to U.S. EPA a petition to cease operation of the system(s). The petition to cease operation shall include documentation that all groundwater cleanup standards have been continuously achieved at the point of compliance for at least six (6) consecutive sampling rounds and a demonstration that groundwater cleanup standards will not be exceeded if the petition to cease operations is granted. U.S. EPA may deny the petition if it determines, in its sole discretion, that there is inadequate sampling, monitoring data, and/or modelling to support the petition.

If U.S. EPA determines that the petition contains insufficient data to warrant shutting down the LFAS or other groundwater restoration system, then U.S. EPA may inform WMWI of the additional sampling and monitoring necessary to determine whether such shut-down is appropriate. If Settling Defendant wishes to submit a new petition to cease operations, Settling Defendant shall submit a revised groundwater sampling and monitoring plan for implementing the required additional sampling and monitoring within the time period required by U.S. EPA and at least six (6) months before sampling and monitoring under the revised plan would begin. Settling Defendant shall implement the revised sampling monitoring plan after it is approved by U.S. EPA.

If U.S. EPA grants a petition to cease operations, then Settling Defendant shall submit a Draft Groundwater Remedial Action Report ("GRAR") reporting on sampling and monitoring data collected, in the manner required by Part II.B.2.b.(3), below, over a period of five years after shutdown of the LFAS or other groundwater restoration system. The Draft GRAR shall state whether Settling Defendant believes all groundwater cleanup objectives contained in the GCOU ROD have been achieved. If U.S. EPA determines that the Draft GRAR does not demonstrate that cleanup objectives have been achieved, then the Settling Defendant shall submit a proposal within sixty (60) days after receiving U.S. EPA's comments on the Draft GRAR for additional actions, including restarting the LFAS, operation of a modified LFAS,

and/or implementation of other appropriate cleanup technologies that will ensure cleanup objectives are achieved. The proposal shall also include a schedule for implementation of the proposed additional actions and be subject to U.S. EPA review and approval.

Implementation of all additional actions shall be done until all groundwater cleanup objectives have been achieved. When the Settling Defendant believes that the additional actions have achieved all of the groundwater cleanup objectives, the Settling Defendant shall submit to U.S. EPA a petition to cease operations, in accordance with the preceding provisions of this Section II.B.2.a of the SOW, for U.S. EPA approval. If U.S. EPA approves the petition, then the Settling Defendant shall continue monitoring the groundwater in accordance with this SOW until Settling Defendant believes that the monitoring data show that the groundwater cleanup objectives have been met for five (5) consecutive years after operations have ceased pursuant to the granted petition, and submits a Draft Groundwater Remedial Action Report to that effect.

If U.S. EPA approves the Draft GRAR, or approves the Draft GRAR subject to Settling Defendant addressing U.S. EPA's comments, Settling Defendant shall submit a Final GRAR to U.S. EPA 30 days after receiving such approval and/or comments.

(2) Notification of Temporary LFAS Shutdown

If, for any reason during the period of operation of the LFAS, the operation of the LFAS is interrupted or stopped, whether due to mechanical failure, human error, or any other reason (except for routine maintenance), then the Settling Defendant shall notify the U.S. EPA of such interruption or cessation of operation as soon as practicable but not later than within forty-eight (48) hours after learning thereof. Such notification may initially be given orally, but must be confirmed in writing within ten (10) calendar days after oral notice is given. In the written confirmation, the Settling Defendant shall notify U.S. EPA of the nature and cause of the interruption or cessation of operation, as well as the estimated length of time before the operation of the LFAS will be resumed.

In all cases where there is an interruption or cessation in the operation of the LFAS, whether due to mechanical failure, human error, or to perform routine maintenance, as well as any other reason, the Settling Defendant shall use its best efforts to repair, complete maintenance, or take any other steps necessary to timely resume the operation of the LFAS.

b. Groundwater Monitoring

The Settling Defendant shall continue to implement a groundwater monitoring program for the GCOU in accordance with U.S. EPA-approved monitoring plans, including the long-term groundwater monitoring plan included as part of the RD Work Plan dated July 1993 and as modified by the LFAS Implementation & Monitoring Plan dated January 2001, and future revisions thereof.

(1) Additional Wells/Monitoring Locations

If U.S. EPA determines that the groundwater monitoring program is inadequate to detect changes in the chemical concentration in groundwater, or the rate of change, or to determine the effectiveness of the LFAS, U.S. EPA may require, by written notification to the Settling Defendant, additional groundwater monitoring wells. If U.S. EPA determines that the groundwater monitoring program is inadequate to detect changes in the chemical concentrations in private wells located around the Site, the U.S. EPA may require, by written notification to the Settling Defendant, that additional private wells be sampled.

If, during the sampling activities of private wells, unusual phenomena or data are encountered, including, but not limited to, high or low pH, conductivity, or unusual odors, the Settling Defendant shall inform U.S. EPA, orally, electronically, or in writing, within five (5) calendar days after the unusual phenomena were first observed.

(2) Sampling Frequency and Analyses

The Settling Defendant shall perform and report field sampling and laboratory analysis as set forth in the sampling plans approved by U.S. EPA including the long-term groundwater monitoring plan included as part of the RD Work Plan dated July 1993 and the Low-Flow LFAS Implementation & Monitoring Plan dated January 2001, and future revisions thereof.

At a minimum, monitoring wells shall be sampled on a semi-annual basis unless and until U.S. EPA allows sampling at another frequency. The private wells located around the Site shall be sampled on an annual basis or as otherwise directed by U.S. EPA.

If U.S. EPA determines that the groundwater monitoring program is inadequate to detect changes, or the rate of change, in the chemical concentrations in groundwater, or to determine the effectiveness of the LFAS, then U.S. EPA may require a modified sampling frequency upon written notification to the Settling Defendant.

(3) Post-Shutdown Monitoring

After ceasing operation of the LFAS or any other groundwater restoration system operating at the Site, the Settling Defendant shall thereafter perform monitoring of groundwater, in accordance with provisions of U.S. EPA-approved monitoring plans including the long-term groundwater monitoring plan included as part of the RD Work Plan dated July 1993 and as modified by the LFAS Implementation & Monitoring Plan dated January 2001, and future revisions thereof, and document the concentrations of hazardous substances, pollutants, and contaminants in groundwater at and adjacent to the Site.

The frequency of monitoring after ceasing operations pursuant to granting of a petition under Section II.B.2.a.(1), above, shall be quarterly for two (2) years. If cleanup standards have been achieved for each compound in the aquifer at the point of compliance (identified in Section II.B.2.c of this SOW) and beyond for two years, then monitoring can be conducted semi-annually for the next three (3) years. Thereafter, the Settling Defendant may petition for annual monitoring. Monitoring shall continue until the Settling Defendant demonstrates that the

Cleanup Standards as referenced in Section II.B.2.d below have been continuously satisfied for thirty (30) years after ceasing operations pursuant to granting of a petition under Section II.B.2.a.(1), above.

If U.S. EPA determines that the post-shutdown groundwater monitoring program is inadequate to detect changes, or the rate of change, in the chemical concentrations in groundwater at or adjacent to the Site, U.S. EPA may modify the sampling frequency and/or duration upon written notification to the Settling Defendant.

(4) Groundwater Monitoring Reports

Settling defendant shall submit a Groundwater Monitoring Report (GMR) to U.S. EPA for each monitoring event relating to all or part of the groundwater monitoring well system or to any or all of the nearby private wells. Each GMR shall be submitted no later than ninety (90) days after completing each monitoring event. Each GMR shall at a minimum include all data generated by the monitoring event, and all relevant and related documents, such as QA/QC and chain of custody documentation. Each GMR shall address how effectively the LFAS or other groundwater restoration system operating at the Site is protecting the private wells located around the Site. Each GMR shall include physical/chemical data from the associated monitoring network and the physical/chemical data in private wells. In addition to the GMR, for monitoring events related to one or more private well(s) the Settling Defendant shall submit the raw data package from the private well analysis to U.S. EPA within seven (7) days after proper QA/QC is completed for the private wells data.

If, based on the results of the private well monitoring, field information, and other groundwater data, U.S. EPA determines that private wells located around and downgradient of the Site are impacted by contaminated groundwater, then the Settling Defendant shall implement appropriate response action as determined by U.S. EPA including, but not limited to, the supply of bottled water to the residences impacted.

c. Point of Compliance.

The point of compliance shall be at the waste management boundary (i.e., at the edge of the landfill cap).

In accordance with the National Contingency Plan (NCP), evaluation of whether groundwater standards have been met will be at the point of compliance and wherever groundwater is monitored beyond the point of compliance. The groundwater cleanup standards are presented in the attached Table 1. In order to monitor and evaluate the remedial actions, certain groundwater monitoring wells shall be selected by U.S. EPA (in consultation with the WDNR), to measure compliance with the performance standards and the cleanup standards. These wells shall be proposed by the Settling Defendant for approval by the U.S. EPA (in consultation with the WDNR). If these wells are destroyed or in any way not able to be sampled, then they shall be repaired or replaced by the Settling Defendant within a time frame specified

by U.S. EPA. Additional wells may be required by the U.S. EPA (in consultation with the WDNR) pursuant to Section II.B.4 of this SOW.

d. Cleanup Standards

The LFAS, or other groundwater restoration system as required by U.S. EPA in accordance with this SOW, will be operated until groundwater cleanup standards have been achieved in the aquifer at the point of compliance and beyond, consistent with all requirements of this Section II.B of this SOW. The clean-up standards for groundwater for the Site are Preventive Action Limits (PALs), as set forth in the Wisconsin Administrative Code, Chapter NR 140, which shall apply to those chemicals that were found to exceed PALs, as well as all chemicals found to exceed PALs during the Groundwater Monitoring Program. Table 1 lists the Wisconsin Administrative Code, Chapter NR 140, applicable PALs for those chemicals found at the Site that exceed the PALs, and the Enforcement Standards (ES). Additionally, clean-up standards consistent with the National Contingency Plan (NCP) and Record of Decision may be specified by the U.S. EPA for other contaminants that may be detected during monitoring that lack a Chapter NR 140 numeric standard.

Consistent with the exemption criteria of NR 140.28, Wis. Adm. Code, U.S. EPA may establish a Wisconsin Alternative Concentration Limit (WACL) cleanup standard, if, based on Site-specific monitoring data gathered before and after implementation of the selected groundwater remedy, U.S. EPA determines that it is not technically and economically feasible to achieve the PALs for a specific substance. Except where the background concentration of a compound exceeds the ES, and consistent with the criteria in NR 140.28(4)(B), the WACL that is established may not exceed the ES for that compound.

Cleanup standards for the groundwater will be met within in a reasonable period of time. U.S. EPA may specify a specific time period for reaching the standards, depending on the remedial action method required in accordance with this Section II.B.2. of this SOW.

3. Source Control Operation and Maintenance

a. Cap Operation and Maintenance

The Settling Defendant shall operate and maintain the landfill cap at the Site in order to minimize release of contaminants into groundwater. Operation and maintenance of the landfill cap shall be done in accordance with U.S. EPA-approved plans including the Long-Term Operation and Maintenance Plan which was included in the 100% RD report for the cap dated August 1991.

b. ISVE

The Settling Defendant shall operate and maintain the as-built ISVE system in accordance with U.S. EPA-approved plans including the long-term monitoring and O&M plan which was included in the 100% RD for the ISVE system dated August 1993.

(1) Notification of Temporary Shut Down of ISVE System

If, for any reason during the period of operation of the ISVE System, the operation of the ISVE System is interrupted or stopped, whether due to mechanical failure, human error, or any other reason (except for routine maintenance), then the Settling Defendant shall notify the U.S. EPA of such interruption or cessation of operation as soon as practicable but not later than within forty-eight (48) hours after learning thereof. Such notification may initially be given orally, but must be confirmed in writing within ten (10) calendar days after oral notice is given. In the written notification, the Settling Defendant shall notify U.S. EPA of the nature and cause of the interruption or cessation of operation, as well as the estimated length of time before the operation of the ISVE will be resumed.

In all cases where there is an interruption or cessation in the operation of the ISVE System, whether due to mechanical failure, human error, or to perform routine maintenance, as well as any other reason, the Settling Defendant shall use its best efforts to repair, complete maintenance, or take any other steps necessary to timely resume the operation of the ISVE System.

(2) ISVE Monitoring Reports

The Settling Defendant shall submit ISVE operation and maintenance reports and monitoring data with the annual progress reports described in Section III.A of this SOW.

(3) Termination of Operation

The Settling Defendant shall operate the ISVE system until the Source Control Operable Unit (SCOU) cleanup levels have been achieved in accordance with the Proposed Cleanup Levels for the Bioventing System report dated August 1996.

When the Settling Defendant believes that the ISVE system, or any other SCOU restoration system operating at the site, has consistently met all SCOU cleanup levels at least over six (6) consecutive sampling rounds, the Settling Defendant shall submit to U.S. EPA a petition to cease operation of the system(s). The petition to cease operation shall include documentation that all SCOU cleanup standards have been continuously achieved for at least six (6) consecutive sampling rounds and a demonstration, based on the Settling Defendant's best scientific judgement (as approved by U.S. EPA), that there is no likelihood that SCOU cleanup standards will be exceeded after the ISVE system, or any other operating SCOU restoration system at the site, is shut down. U.S. EPA may deny the petition if it determines, in its sole discretion, that there is inadequate sampling and/or monitoring data to support the petition.

If U.S. EPA determines that the petition contains insufficient data to warrant shutting down the ISVE system or other SCOU restoration system, then U.S. EPA may require additional sampling and monitoring necessary to determine whether such shut-down is appropriate. Settling Defendant shall submit a revised sampling and monitoring plan for implementing the

required additional sampling and monitoring within the time period required by U.S. EPA and at least six (6) months before sampling and monitoring under the revised plan would begin. Settling Defendant shall implement the revised sampling monitoring plan after it is approved by U.S. EPA.

If U.S. EPA grants a petition to cease operations, then Settling Defendant shall submit a Draft SCOU Remedial Action Report ("SCOURAR") reporting on sampling and monitoring data collected over a period of five years after shutdown of the ISVE or other SCOU restoration system. The Draft SCOURAR shall state whether Settling Defendant believes all SCOU cleanup objectives contained in the SCOU ROD have been achieved. If U.S. EPA determines that the Draft SCOURAR does not demonstrate that cleanup objectives have been achieved, then the Settling Defendant shall submit a proposal within sixty (60) days after receiving U.S. EPA's comments on the Draft SCOURAR for additional actions, including restarting the ISVE system, operation of a modified ISVE system, and/or implementation of other appropriate cleanup technologies that will ensure clean-up objectives are achieved. The proposal shall also include a schedule for implementation of the proposed additional actions and be subject to U.S. EPA review and approval.

Implementation of all additional actions shall be done until all SCOU cleanup objectives have been achieved. When the Settling Defendant believes that the additional actions have achieved all of the SCOU cleanup objectives, the Settling Defendant shall submit to U.S. EPA a petition to cease operations, in accordance with the preceding provisions of this Section II.B.3.b.(3), for U.S. EPA approval. If U.S. EPA approves the petition, then the Settling Defendant shall continue monitoring the SCOU in accordance with this SOW until Settling Defendant believes that the monitoring data show that the SCOU cleanup objectives have been met for five (5) consecutive years after the ISVE system or other SCOU treatment system at the Site has been shut down, and submits a Draft SCOU Remedial Action Report to that effect as required by paragraph III.C of this SOW.

If U.S. EPA approves the Draft SCOURAR, or approves the Draft SCOURAR subject to Settling Defendant addressing U.S. EPA's comments, Settling Defendant shall submit a Final SCOURAR to U.S. EPA 30 days after receiving such approval and/or comments.

4. Additional studies

The U.S. EPA may require the Settling Defendant to conduct additional studies, including without limitation the evaluation of additional remedial action options and the installation and monitoring of additional monitoring wells, to supplement the available technical data for optimizing the treatment and/or disposal operations and systems. If requested by U.S. EPA, all principal personnel who will be responsible for Settling Defendant's development or implementation of additional studies will meet with U.S. EPA to discuss objectives, resources, communication channels, role of personnel involved and orientation of the Site. U.S. EPA may request such a meeting before or after formally requiring additional studies or installation and monitoring of additional monitoring.

All such additional studies, including the installation and monitoring of additional monitoring wells, shall be at the discretion and under the direction of the U.S. EPA. The Settling Defendant shall furnish all services, including field work as required, materials, supplies, plant, labor, equipment, investigations, studies, and superintendence for all such additional studies, including the installation and monitoring of additional monitoring wells. The Settling Defendant shall perform sufficient sampling, testing, and analysis to determine how to optimize the treatment and/or disposal operations and systems in accordance with an approved work plan.

Settling Defendant shall prepare and submit to U.S. EPA an interim report presenting the results of the study for optimizing the treatment and/or disposal operations and systems. A review conference shall be scheduled after the interim report has been reviewed by all interested parties. The Settling Defendant's final report shall include all data taken during the testing and a summary of the results of the study.

III: REPORTS AND SUBMISSIONS

The Settling Defendant shall prepare and submit to U.S. EPA progress and other reports as set forth in Tasks I through II to document the operation, maintenance, monitoring and completion of the Remedial Action. The documentation shall include, but not be limited to the following:

A. Progress

The Settling Defendant shall at a minimum provide the U.S. EPA with signed annual progress reports for all operation and maintenance activities containing:

1. Summaries of all findings, including operational effectiveness;

2. Summaries of all changes made during the reporting period;

3. Summaries of all contacts with any representative of the local community, public interest groups, and/or State government during the reporting period;

4. Summaries of all problems or potential problems encountered during the reporting period;

5. Actions being taken to rectify problems;

6. Changes in personnel during the reporting period;

7. Projected work for the next reporting period; and

8. Copies of daily reports, inspection reports, laboratory/monitoring data, etc.

B. Monitoring

The Settling Defendant shall submit an ISVE Monitoring Report to U.S. EPA sixty (60) days after completion of each round of monitoring, or in such additional time as U.S. EPA may approve in writing. The ISVE Monitoring Report shall, at a minimum, include all data generated by the monitoring event, and all relevant and related documents, such as QA/QC and chain of custody documentation.

The Settling Defendant shall submit ISVE operation, maintenance, and monitoring reports with the annual progress reports.

The Settling Defendant shall submit groundwater sampling and monitoring reports for the GCOU as specified in Section II.B.2.b. of this SOW.

The Settling Defendant shall submit LFAS operation, maintenance, and monitoring reports with the annual progress reports.

C. Remedial Action Completion Reports

Settling Defendant shall submit draft and final Remedial Action Reports for the GCOU and SCOU as specified in Section II.B. of this SOW.

IV: SUBMISSION SUMMARY

The Settling Defendant's reporting shall comply with the following timetable information reporting requirements:

Submission	Due Date
Report on LFAS Investigation Results	90 days after completion of investigation
Petition to Cease Operations of LFAS or other groundwater restoration system	When all groundwater cleanup standards have been consistently met over 6 consecutive sampling rounds
Groundwater Monitoring Report	90 days after completion of each monitoring event
Raw Data Package for Private Wells	Within seven (7) days after QA/QC is completed
Draft Groundwater Remedial Action Report	After 5 years of post shut down monitoring demonstrates cleanup objectives have been continuously met
Revised Groundwater Monitoring and Sampling Plan	As required by EPA; at least 6 months before start of additional sampling work
Proposal for Additional Actions to ensure cleanup objectives will be achieved	60 days from receipt of U.S. EPA comments on draft GRAR
Notification of Temporary LFAS Shutdown	Oral: Within 48 hours of learning of incident Written: Within 10 calendar days after oral notice
Final Groundwater Remedial Action Report (GRAR)	30 days after approval or approval subject to comments of Draft Remedial Action Report

ISVE Monitoring Report	60 days after completion of sampling round (unless extended)
Notification of Temporary ISVE Shutdown	Oral: Within 48 hours of learning of incident Written: Within 10 calendar days after oral notice
Petition to cease operation of ISVE or other SCOU restoration system	When all SCOU cleanup standards have been consistently met over 6 consecutive sampling rounds
Draft SCOU Remedial Action Report	30 days after achieving the Cleanup Standards
Final SCOU Remedial Action Report	30 days after approval or approval subject to comments of Draft Remedial Action Report
Signed Annual Progress Reports for all O & M activities	Annually
Report on Unusual Phenomena or Data	Within 5 calendar days after unusual phenomena first observed