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**EDWARDS AFB
CALIFORNIA**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 5597



5597001

DEPARTMENT OF THE AIR FORCE
AIR FORCE CIVIL ENGINEER CENTER
INSTALLATION SUPPORT SECTION
EDWARDS AIR FORCE BASE, CALIFORNIA

9 January 2019

MEMORANDUM FOR DISTRIBUTION

FROM: AFCEC/CZOW
120 North Rosamond Boulevard
Edwards AFB CA 93524

SUBJECT: Minutes of the Edwards Air Force Base (AFB) Restoration Advisory Board (RAB)
Meeting, 17 May 2018

1. Time: 5:30 p.m.
2. Place: California City, California
3. Chairman: Mr. Bruce Davies, Public Co-chair
4. The following RAB members were present:

<u>Name</u>	<u>Position</u>
Ms. Ericka Buckreis	Boron Public Representative
Mr. Kevin Depies	California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC) Remedial Project Manager (RPM)
Mr. William Gaddis	Rosamond Public Representative
Ms. Amanda Lopez	Lahontan Regional Water Quality Control Board (LRWQCB) RPM
Dr. Joseph Mabry	Air Force Research Laboratory, Detachment 7 (AFRL) Public Representative
Mr. Alonzo Poach	LRWQCB RPM
Mr. Paul Schiff	Edwards AFB RPM
Ms. Jocelyn Swain	Lancaster Public Representative
Mr. Victor Yaw	Mojave Public Representative
Mr. Otto Zahn	Edwards AFB Main Base Test Wing Public Representative

5. The following members were absent:

<u>Name</u>	<u>Position</u>
Mr. Marvin Crist	Lancaster Public Representative (Alternate)
Mr. Christopher Dirscherl	United States Environmental Protection Agency (U.S. EPA) RPM
Dr. David Smith	Air Force Co-chair
Vacant	Edwards AFB Base Housing Public Representative
Vacant	California City Public Representative

Vacant	Edwards AFB North Base Public Representative
Vacant	Edwards AFB South Base Public Representative
Vacant	National Aeronautics and Space Administration (NASA) Armstrong Public Representative

6. The following advisors were present:

<u>Name</u>	<u>Organization</u>
Mr. Gary Hatch	412th Test Wing Public Affairs
Ms. Rebecca Hobbs	Air Force Civil Engineer Center (AFCEC)/Installation Support Section-West (CZOW)
Mr. Craig Nathe	AFCEC/CZOW
Mr. Michael Rohall	AFCEC/CZOW
Mr. Herb Roraback	412th Civil Engineer Group, Environmental Management
Dr. Nash Saleh	AFCEC/CZOW
Col Jason Schott	412th Test Wing
Mr. Warren Seidel	412th Test Wing Judge Advocate
Ms. Julia Tseng	AFCEC/CZOW

7. Others present were as follows:

<u>Name</u>	<u>Organization</u>
Mr. David Daftary	APTIM
Ms. Megan Duley	Newfields Government Services, LLC
Mr. James Elliot	Tetra Tech
Ms. Maribel Harms	AGEISS, Inc.
Mr. Kevin North	Media Fusion
Mr. John Perry	Media Fusion
Ms. Leilani Richardson	AGEISS, Inc. (Recorder)
Mr. Matthew Wolfe	Public

8. Mr. Davies read the *Statement of Purpose and Conduct*.

9. Mr. Davies noted that there are no new RAB members to introduce.

10. Mr. Davies presented the 16 November 2017 RAB meeting minutes for acceptance. The RAB accepted the minutes as presented.

11. New Business.

a. *Update of the RAB Bylaws (Statement of Purpose and Conduct)*.

(1) Mr. Schiff briefed that the Air Force proposed edits to the RAB Bylaws to account for the abridged version of the Statement of Purpose and Conduct the board approved to be read aloud at the start of every RAB meeting. He said the proposed edits had been submitted to the board for review via e-mail and were provided in the meeting packets with the goal of obtaining board approval during the May 2018 meeting.

(2) Ms. Richardson reported that the proposed edits will allow the unabridged version of the Statement of Purpose and Conduct to remain in the RAB Bylaws. She said the unabridged version will also be displayed on poster board at each meeting, which Mr. Gaddis suggested at the November 2017 RAB meeting.

(3) Mr. Davies asked whether there were any objections to the edits proposed in the RAB Bylaws, and there were none from the board members.

b. *Environmental Restoration Program (ERP) Update* (Attachment 1).

(1) Mr. Schiff provided an update of action items generated at the November 2017 RAB meeting:

(a) *Opening statement read by the co-chairs*—Mr. Schiff noted that this action item had already been addressed by the Update of the RAB Bylaws (reference Section 11.a).

(b) *Review RAB Bylaws regarding membership and minimum population requirements.*

1 Mr. Seidel reported that he and Mr. Hatch reviewed the RAB Charter and Bylaws and neither document specifies which areas on base should be represented. He surmised that base representation has traditionally been established based on Operable Unit, but the North Base public representative position has been vacant for years because of continual difficulties in finding a volunteer from the North Base community. Mr. Seidel briefed that the RAB had raised the possibility of eliminating the North Base position from the board during the November 2017 meeting. He concluded that the issue is an internal Air Force matter that warrants a decision from the Edwards AFB Installation Commander on whether to maintain the North Base public representative position or incorporate the North Base community into another represented area of the base.

2 Mr. Depies asked why the issue is an internal Air Force matter, and Mr. Seidel explained that the Air Force appoints all of the on-base public representatives. He assured the RAB that none of the off-base community positions will be affected by the commander's decision. Mr. Depies suggested that the North Base position remain dormant, and Mr. Seidel replied that a decision should be made regarding how long the position should remain dormant and whether to incorporate the North Base community into another represented area on base. Mr. Depies asked if another base representative would need to theoretically drive to North Base to brief employees, and Mr. Seidel said it is a possibility, which may result in increased duties for one of the base representatives. He said he will advise the Edwards AFB Installation Commander to consider combining the North Base community with another base community that is already represented on the board.

(2) Mr. Schiff briefed the status of two formal disputes at Edwards AFB.

(a) The South AFRL Explanation of Significant Differences (ESD) dispute is currently awaiting a final decision from the U.S. EPA Headquarters Administrator. The dispute revolves around the toxicity science for perchloroethylene (PCE) and related legal aspects. The U.S. EPA Region 9 issued a decision on the dispute in January 2018, which the Air Force then

elevated to the U.S. EPA Headquarters. In March 2018, the Air Force and regulatory agencies met with the U.S. EPA Headquarters Deputy Administrator to present their positions on the U.S. EPA Region 9 decision. Mr. Depies and Mr. Schiff noted that the U.S. EPA RPM, Mr. Dirscherl, had informed them recently that a final decision from the U.S. EPA Administrator may not be issued for several months.

(b) For the AFRL Arroyos Record of Decision (ROD) dispute, Mr. Schiff reported that the Air Force Dispute Resolution Committee (DRC) member needs to provide a response to a joint DTSC and U.S. EPA Region 9 document titled “Proposed Path for Evaluating and Managing Vapor Intrusion (VI) Risk for Buildings,” which was specific to AFRL buildings included in the proposed ROD under dispute.

(3) Mr. Schiff briefed that the Air Force is currently responding to regulatory comments on the Draft Final Site Inspection Report for emerging contaminants called perfluoroalkyl and polyfluoroalkyl substances (PFAS). He said recommendations were added to the report to perform additional studies on two areas: ERP Site 14 at South Base and Fire Station #5 at North Base.

(4) Mr. Schiff presented the progress of the base’s cleanup program, highlighting restoration activities performed within the last 6 months.

(a) Mr. Gaddis asked the status of the indoor air data from the 11 Operable Unit (OU) 1/8 buildings sampled in addition to Building 1807. Mr. Schiff said Building 1807 is currently the only building with potential vapor intrusion (VI) concerns; the other 11 buildings have been sampled a few times and the results indicate there are no immediate concerns. He noted that the Air Force is working through a process with regulatory agencies to carefully evaluate all of the buildings on base to determine if more data needs to be collected. As a result, the Air Force will be collecting more data on approximately half of the 11 buildings already evaluated. Mr. Schiff said the supplemental data collection will include sub-slab and indoor air samples, which will then be evaluated with past results so the Air Force and regulatory agencies can determine a path forward. Mr. Depies clarified that Building 1807 was the only building where sampling results exceeded action levels.

(b) Mr. Davies asked how the sampling locations were selected in Building 1807. Mr. Schiff explained that the Air Force and regulatory agencies conjointly selected the sampling locations to be spatially representative of the indoor air within the building. Mr. Depies commented that several factors went into the selection of sampling locations, such as spatial coverage and targeting locations where there was known sub-surface contamination or conduits egressing into the building—like the bathroom area. Mr. Davies asked whether the sub-slab had already been sampled in various locations. Mr. Schiff responded that sub-slab data was collected in 2009 along with indoor air data. He said contaminant concentrations were detected below the slab but, because of attenuation, not all of the vapors pass into the building. Mr. Schiff noted that the Air Force collected sub-slab samples during the March 2018 sampling event after indoor air results from the February 2018 sampling event were found to be above action levels. He reported that the 2009 and March 2018 sub-slab data showed similar vapor concentrations under the foundation slab.

(c) Mr. Gaddis asked whether contaminant vapors only affected one room in Building 1807. Mr. Schiff confirmed that Room 101 was the only room affected. He said employees were moved from that section of the building as soon as the elevated levels were detected. Mr. Depies added that Building 1807 has several heating, ventilation, and air conditioning (HVAC) units that are separate from each other, and Mr. Schiff explained that each unit creates its own airspace within the building. He informed the RAB that he expects to brief the status of Building 1807 at future meetings because the Air Force will continue to monitor and address the situation. Mr. Schiff also mentioned that new HVAC units are planned to be installed in Building 1807, and Mr. Depies added that the Air Force currently follows a process to ensure the HVAC systems are continuously running while employees are in the building. He emphasized that the continuous operation of the HVAC unit is only a short-term fix.

(d) Ms. Hobbs reported that the concrete crushing project at South Base, OU2, is nearly 75 percent complete with approximately 600,000 tons of concrete crushed to date. She briefed that the Air Force will collect another round of hydropunch sampling at Site 5 because the first round was unsuccessful in determining the extent of carbon tetrachloride at the site.

(e) Ms. Hobbs explained that the retention basin for the OU7 Site 3 Landfill was created by transferring area soil to the landfill for the cover, something that would otherwise have required the transport of approximately 50,000 dump-truck loads of soil onto the base.

(5) Mr. Davies asked whether the ramp near the former F-22 Raptor area had been sampled for contamination after the concrete was removed as part of a construction project on the flightline. He recalled that an existing treatment system was located immediately outside of the area. Mr. Schiff responded that the Air Force performed several cleanup investigations along the flightline from the late 1980s through the 1990s to identify contaminant releases below the ground surface. He briefed that the construction crew had consulted his office during the planning stage to check on the feasibility of cutting down 2-3 feet below the ground surface without encountering contamination. Mr. Schiff said the investigative data collected from the area indicated that contamination was caused by leaking underground storage tanks, which placed contamination more than 3 feet below the ground surface. Based on the data, he approved the cutting but asked the construction crew to notify his office if they encountered anything. Mr. Schiff also requested that the crew set aside and record the new location of soil that sampled positive for PFAS so that it can be investigated at a later date. Mr. Schiff assured the RAB members that his team works closely with field personnel during base construction projects to ensure restoration concerns are adequately addressed.

(6) Mr. Schiff recognized Ms. Hobbs for winning the 2017 Air Force General Thomas D. White Environmental Restoration Award.

12. Opportunity for Public Comment – Mr. Hatch reported that no public comment cards were received.

13. Old Business – *Status of RAB Vacancies* – Mr. Hatch briefed that the Air Force recently received confirmation from California City to appoint a new public representative and base officials are processing the necessary paperwork. He said the board can expect to meet the new public representative at the November 2018 meeting. Mr. Hatch reported that there are four

remaining vacancies, including public representative positions for North Base, South Base, NASA Armstrong, and Base Housing. He said a few people are interested in the Base Housing position thanks to Mr. Zahn's involvement. Mr. Hatch also announced that the following public representatives were renewing their terms of service: Ms. Swain (Lancaster); Mr. Gaddis (Rosamond); and Dr. Mabry (AFRL).

14. Reports from Public Representatives.

- a. Ms. Buckreis, Boron, did not have any comments.
- b. Mr. Gaddis, Rosamond, had nothing to report.
- c. Ms. Swain, Lancaster, did not have any comments
- d. Mr. Yaw, Mojave, had nothing to report.
- e. Mr. Zahn, Main Base Test Wing, thanked Environmental Restoration, the regulatory agencies, and the contractors who have been addressing the VI concerns in Building 1807. He noted that the room in Building 1807 is a secured area, which involved more levels of coordination than other buildings on base.
- f. Dr. Mabry, AFRL, did not have any comments.
- g. Mr. Davies, North Edwards, thanked the public representatives who renewed their terms of service on the RAB. He expressed admiration for all those voluntarily serving on the board without compensation, particularly those who have been public representatives for several years. Mr. Davies commented on the benefits of having a consistent group of people on the board and said it would be nice to fill all of the vacant positions. He also recognized the field contractors, who he sometimes spots installing wells, an indication of the cleanup progress occurring on the base.

15. Reports from RPMs.

- a. Mr. Poach and Ms. Lopez, Cal/EPA LRWQCB, did not have any comments.
- b. Mr. Depies, Cal/EPA DTSC, commended the Air Force for their efforts on Building 1807, particularly in notifying and collaborating with regulatory agencies as soon as an issue was identified. He said the RPMs developed a methodology for a path forward while the Air Force took a prudent and practical approach in evacuating the building until a temporary resolution could be reached. He added that the HVAC system seems to be addressing the issue but is a short-term solution. Mr. Depies said the RPMs will need to start looking at more permanent means of mitigating VI concerns at Building 1807.
- c. Mr. Schiff, Edwards AFB, thanked Mr. Zahn for facilitating entry into the F-35 Joint Strike Fighter area and for coordinating access to Building 1807.

16. The next RAB meeting is proposed for 15 November 2018 in Boron.

17. The meeting was adjourned at 6:43 p.m.

//Original signed by//

DAVID G. SMITH, NH-IV, DAF
Air Force Co-chair
Restoration Advisory Board

//Original signed by//

BRUCE H. DAVIES
Public Co-chair
Restoration Advisory Board

Attachment:

Environmental Restoration Program Update for Edwards Air Force Base, CA

DISTRIBUTION:

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RAB Members
Cal/EPA DTSC
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U.S. EPA

Air Force Civil Engineer Center



Environmental Restoration Program Update for Edwards AFB, California

Paul Schiff
AFCEC/CZOW
17 MAY 18

Battle Ready...Built Right!

1



List of Acronyms



- AFFF = aqueous film-forming foam
- AFB = Air Force Base
- AFRL = Air Force Research Laboratory, Detachment 7
- CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act
- CT = carbon tetrachloride
- DRC = Dispute Resolution Committee
- DTSC = Dept. of Toxic Substances Control
- EPA = Environmental Protection Agency
- ERP = Environmental Restoration Program
- ESD = Explanation of Significant Differences
- FS = Feasibility Study
- HVAC = heating, ventilation, and air conditioning
- JSF = Joint Strike Fighter
- MMRP = Military Munitions Response Program
- OU = Operable Unit
- PCE = perchloroethene
- PFAS = perfluoroalkyl and polyfluoroalkyl substances
- ROD = Record of Decision
- SI = Site Inspection
- TCE = trichloroethene
- TWG = Technical Working Group
- VI = vapor intrusion

2



Action Items from Nov 2017 RAB Meeting



- **Opening statement read by the co-chairs**
 - A majority of RAB members e-mailed their acceptance of the revised (abbreviated) Statement of Purpose and Conduct read at the start of every meeting
 - The RAB Bylaws have been amended to reflect the change, and the amendment was provided for the RAB's approval
 - Mr. Gaddis suggested displaying the original statement on poster board at each meeting
- **Review RAB Bylaws regarding membership and minimum population requirements**
 - Discussion initiated because of North Base public representative position on the RAB
 - Mr. Seidel and Mr. Hatch to report on their findings

3



Status of Formal Disputes



- **South Air Force Research Laboratory, Detachment 7 (AFRL) Explanation of Significant Differences (ESD)**
 - August 2014: Dispute invoked by California's Dept. of Toxic Substances Control (DTSC)
 - U.S. EPA Headquarters Administrator deferred a final decision to allow DTSC to update and finalize its toxicity value on perchloroethene (PCE), tentatively scheduled for mid-2018
 - **January-April 2018:**
 - U.S. EPA Region 9 issued a decision that the toxicity value from the 2007 Record of Decision (ROD) should remain; decision did not resolve future toxicity value selection
 - Air Force elevated dispute to the U.S. EPA Headquarters Administrator and submitted a supplemental letter disagreeing with U.S. EPA Region 9 decision
 - State regulatory agencies submitted letters to U.S. EPA Headquarters Administrator disagreeing with the Air Force position and supporting U.S. EPA Region 9 decision
 - U.S. EPA Headquarters Deputy Administrator met with all parties in March 2018 to discuss dispute in preparation for future meeting with U.S. EPA Administrator Pruitt
 - As a follow up to the EPA meeting, DTSC submitted information requested by U.S. EPA Headquarters regarding the level of health risk and financial impact
 - **Pending: Meeting with EPA Administrator Pruitt, followed by EPA Administrator's Final Decision**

4



Status of Formal Disputes



- **AFRL Arroyos ROD**

- November 2014: Dispute invoked by the U.S. EPA and DTSC
- March 2018: DTSC Dispute Resolution Committee (DRC) member submitted a joint DTSC/U.S. EPA Region 9 document to Air Force DRC member, titled “Proposed Path for Evaluating and Managing Vapor Intrusion Risk for Buildings,” which was specific to AFRL buildings included in the proposed ROD under dispute
- Pending: Air Force DRC response to joint proposal

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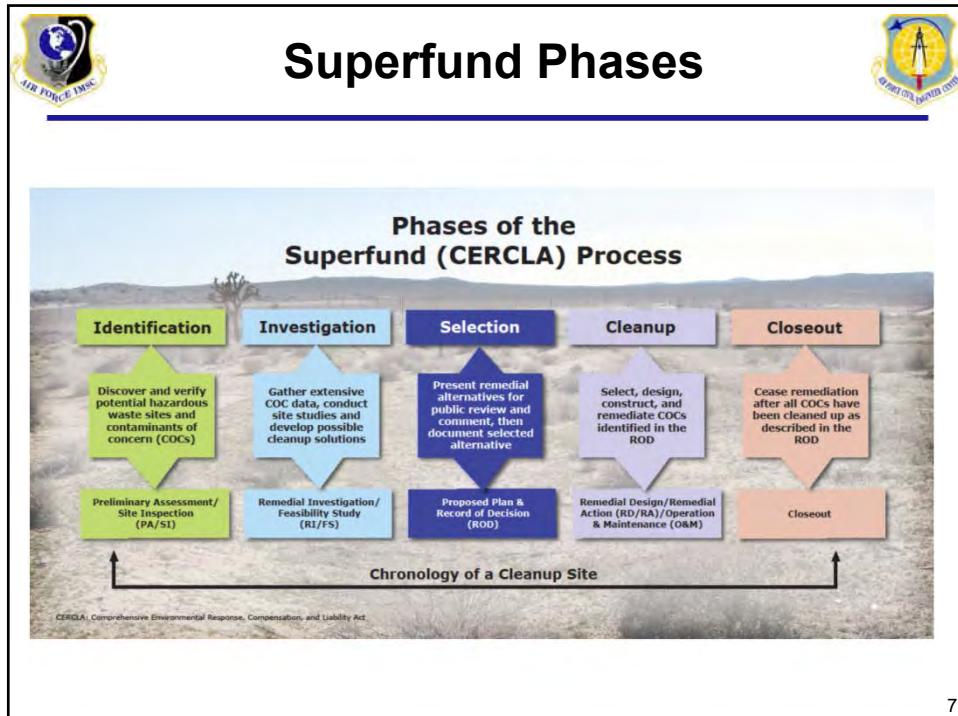


Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)

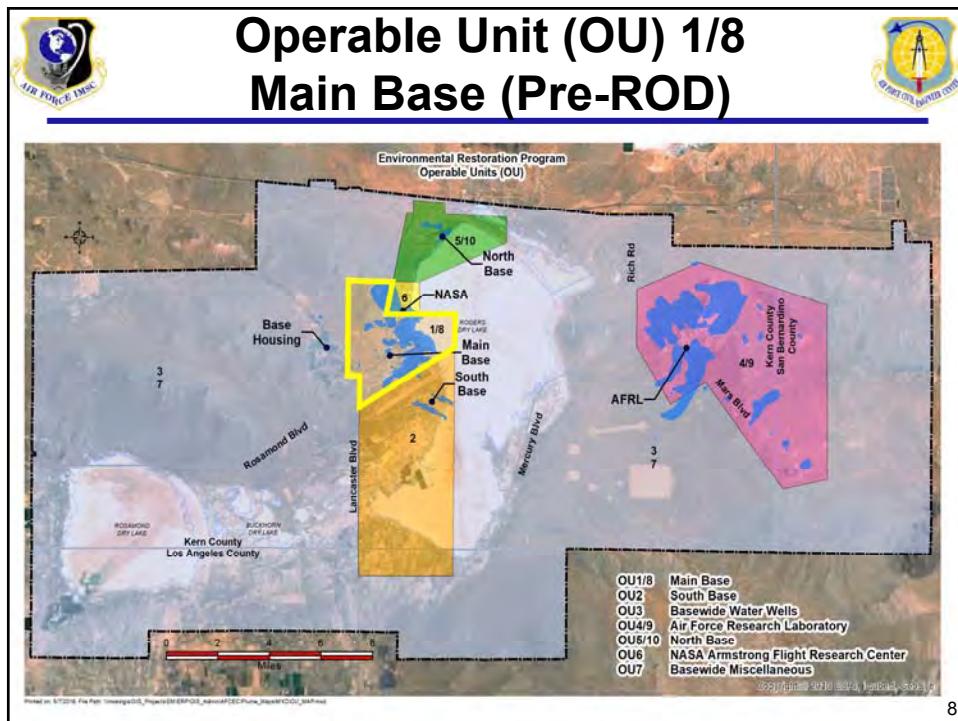


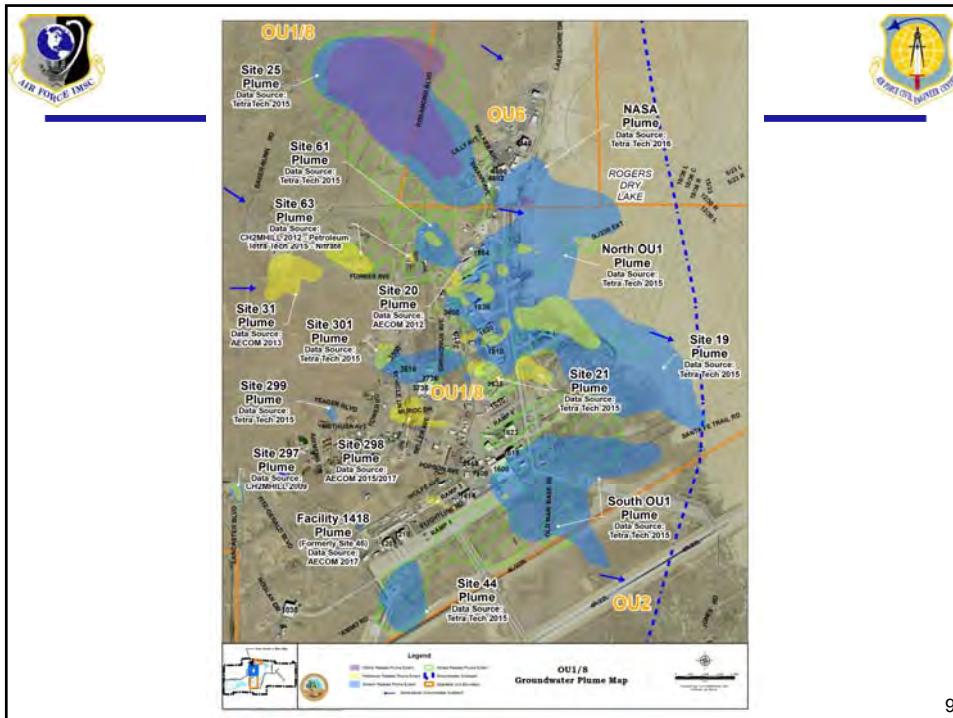
- Response to regulator comments and Draft Final Site Inspection (SI) Report submitted to regulators mid-March 2018
- Recommendations being added for two aqueous film-forming foam (AFFF) Areas
 - AFFF Area 1 Environmental Restoration Program (ERP) Site 14
 - AFFF Area 15 Fire Station #5
- Response to regulator comments on Draft Final SI currently in Air Force review

6



7





OU1/8 Main Base (Pre-ROD)

- Technical Working Group (TWG) meetings held in March and May 2018 discussing vapor intrusion (VI) proposed investigation steps for Main Base buildings, for incorporation into OU1/8 Feasibility Study (FS) Addendum
 - Developed a process for evaluating buildings not sampled
 - Reviewed indoor air data for the 12 buildings sampled and team determined sampling parameters (if warranted) for each building

10



OU1/8 Main Base (Pre-ROD)



- **Building 1807 Indoor Air**

- February 2018: 24-hr indoor air sampling results within northern half of building were above EPA Urgent Response Action Level for trichloroethene (TCE) short-term exposure
 - Joint Strike Fighter (JSF) relocated all staff from affected area of building
 - JSF increased heating, ventilation, and air conditioning (HVAC) circulation make-up air
- March 2018: 24-hr indoor air sampling results lower—below Urgent Response Action Level; however, still above EPA Accelerated Response Action Level
- Early April 2018: 12-hr (daytime and nighttime) and 24-hr indoor air sampling results all below action levels; however, data suspect/inconclusive due to extremely high winds

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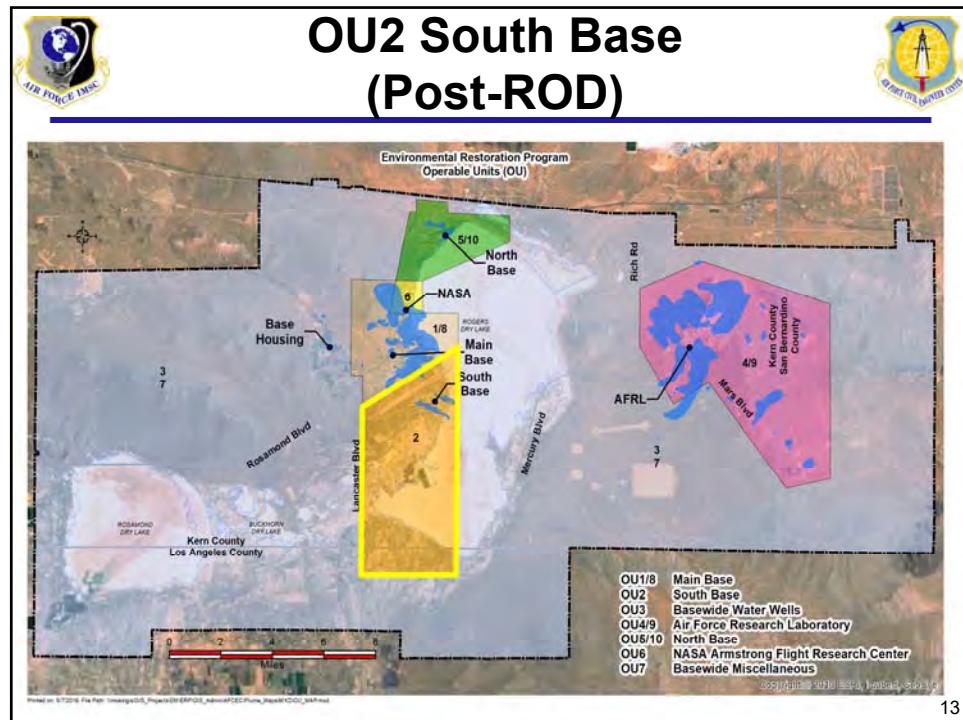
OU1/8 Main Base (Pre-ROD)



- **Building 1807 Indoor Air [concluded]**

- Late April 2018: A repeat of early April 12-hr (daytime and nighttime) and 24-hr indoor air sampling results indicated TCE levels below all action levels while HVAC operating (generally daytime); however, above Urgent Response Action Level with HVAC offline (generally nighttime)
 - JSF reconfigured HVAC recirculation blower to operate 24/7
 - JSF re-occupied northern half of building
- **Path forward: Indoor air sampling will occur this week to ensure HVAC is mitigating indoor air TCE concentrations below action levels**
 - Follow-on indoor air sampling will be necessary, at a decreased frequency, once agencies are confident HVAC is mitigating potential VI concerns

12





OU2 South Base (Post-ROD)



- **Sites 5/14, 76, and 86**
 - Treatment systems continue operating at the three sites
- **Sites 29, 81, and 102**
 - A design is being reviewed by the regulators to cover two former skeet sites with crushed concrete
 - Former Main Base Runway concrete is being crushed under a separate contract



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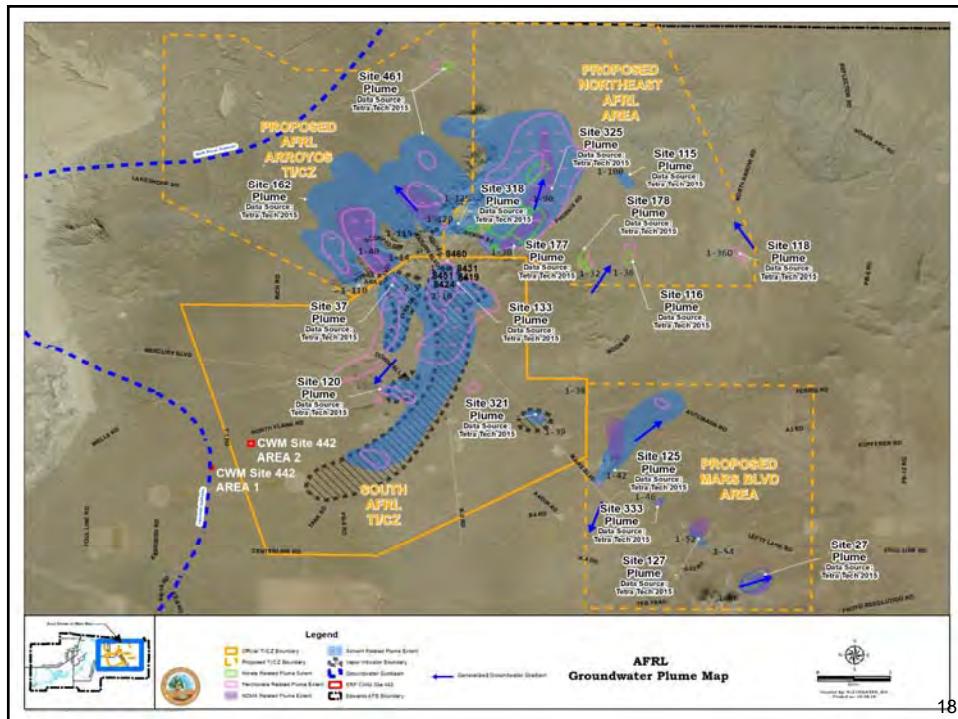
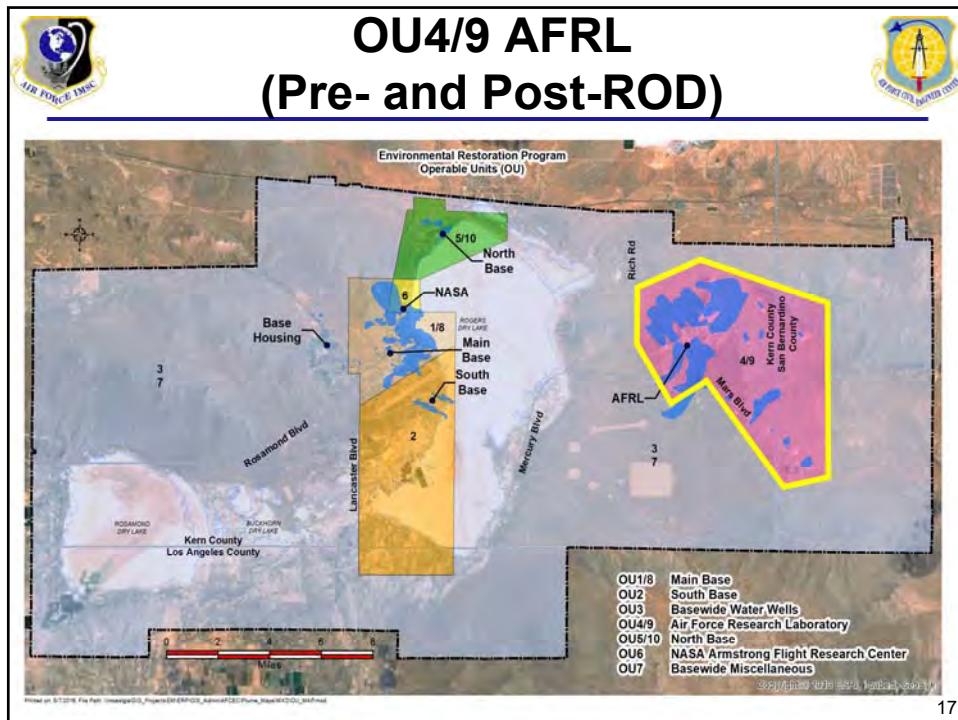


OU2 South Base (Post-ROD)



- **Site 5 Hydropunch Project**
 - Carbon tetrachloride (CT) in groundwater near Birk Flight Test Facility has migrated into existing contaminant plume of jet fuel and solvent, primarily TCE
 - **Hydropunch sampling is being used, rather than drilling more monitoring wells, to determine extent of CT contamination**
 - **Process is simple and inexpensive:**
 - Push pipe into ground to grab groundwater samples at select locations
 - If contamination is present in the original hydropunch locations, then more samples will be taken at progressively distant points from the original locations until the extent of the contamination is determined
 - **Hydropunch locations will later be used to install key groundwater wells to monitor the contamination**

16





OU4/9 South AFRL (Post-ROD)



- Air Force installed a new well at the South AFRL in early 2018 in accordance with the Second Five-Year Review Report
 - Will help delineate the plume's leading edge
 - Sampling analyses are pending

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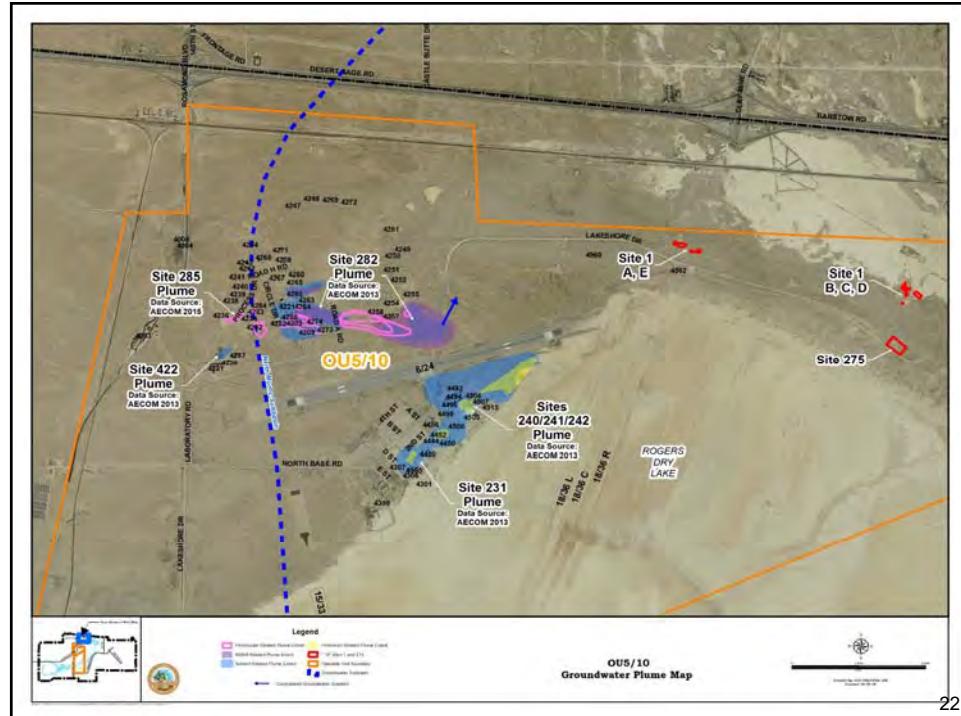
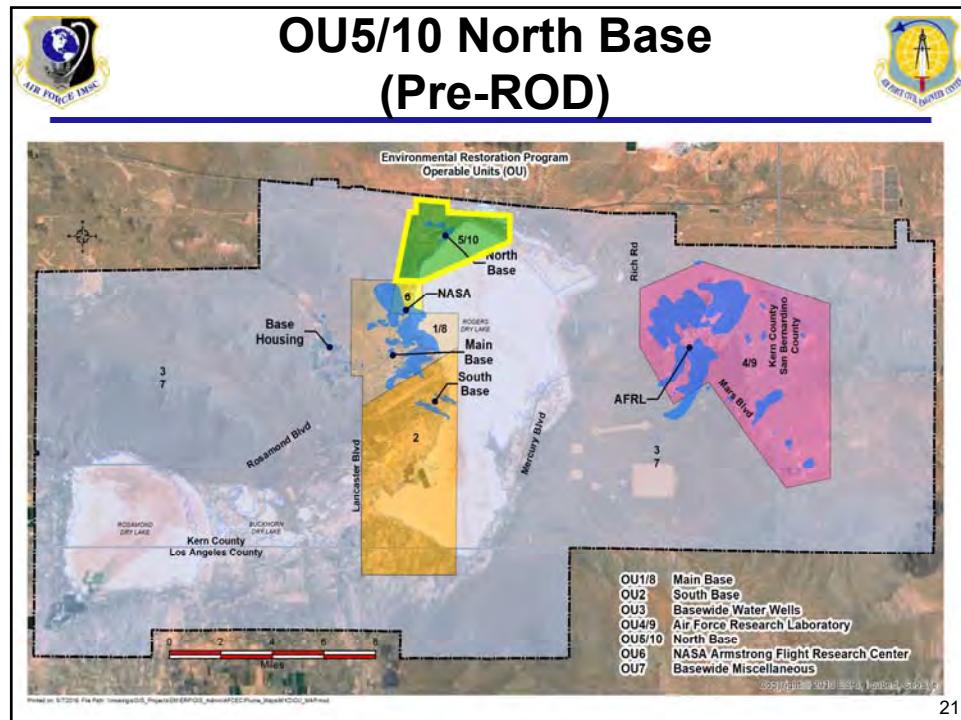


OU4/9 AFRL Soil Debris Sites (Post-ROD)



- The Air Force started the Second Five-Year Review of the AFRL Soil and Debris Sites
 - Site inspection conducted in December 2017
 - A draft report was submitted to the regulators in March 2018. Regulator comments due May 2018
- Notifications will run in the local newspapers when final report becomes available to the public, expected September 2018

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OU5/10 North Base (Pre-ROD)

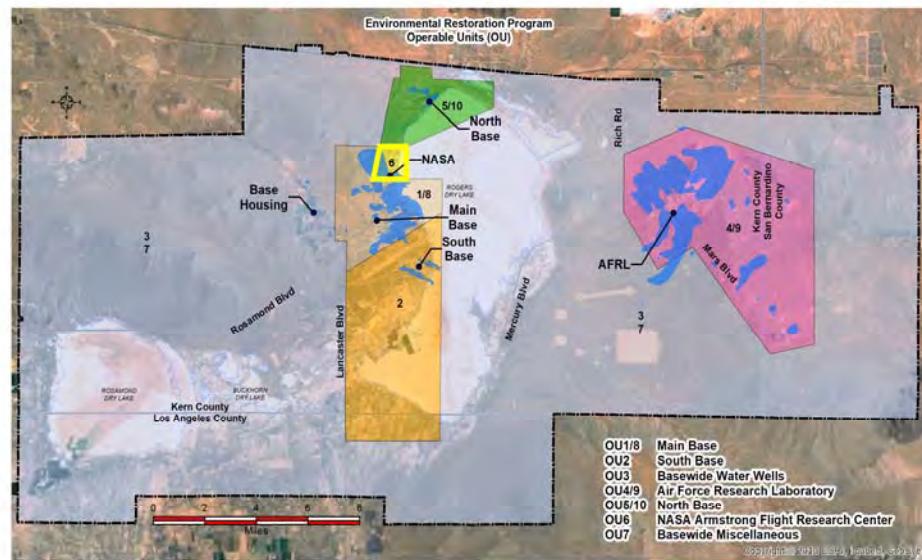


- The Draft OU5/10 FS Addendum is under review by the regulators
- Site 285 interim treatment system to address perchlorate in groundwater continues to operate

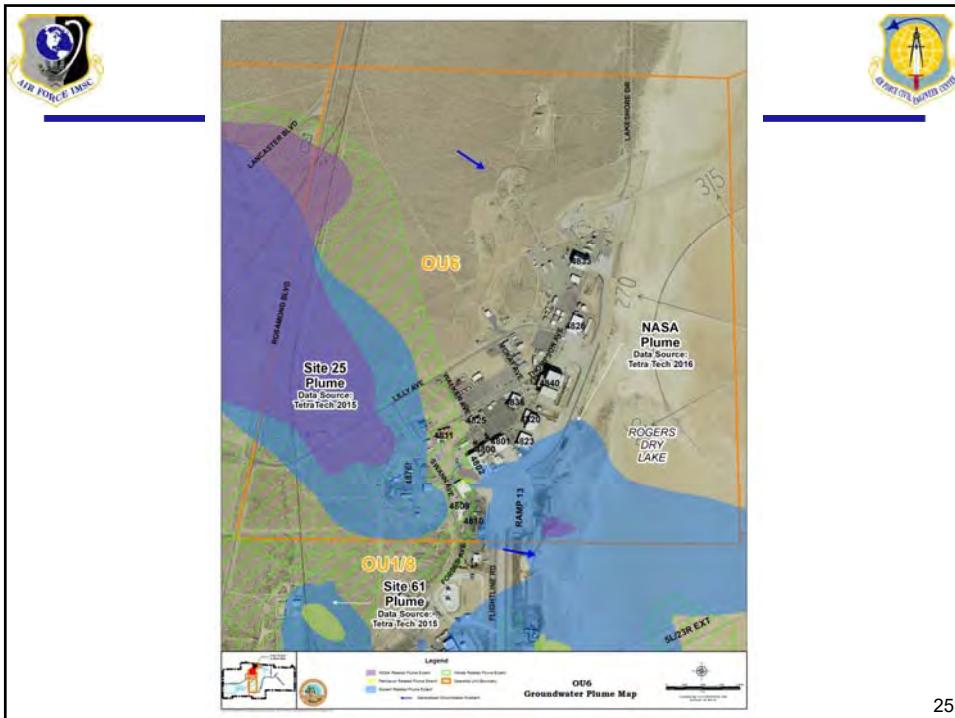
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OU6 NASA Armstrong (Post-ROD)

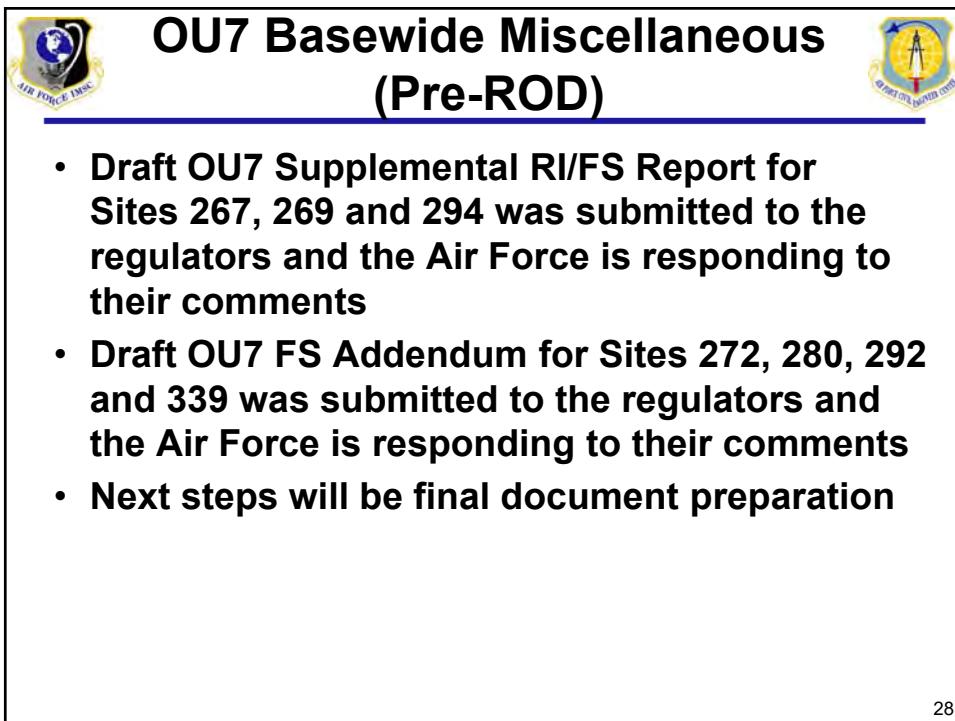
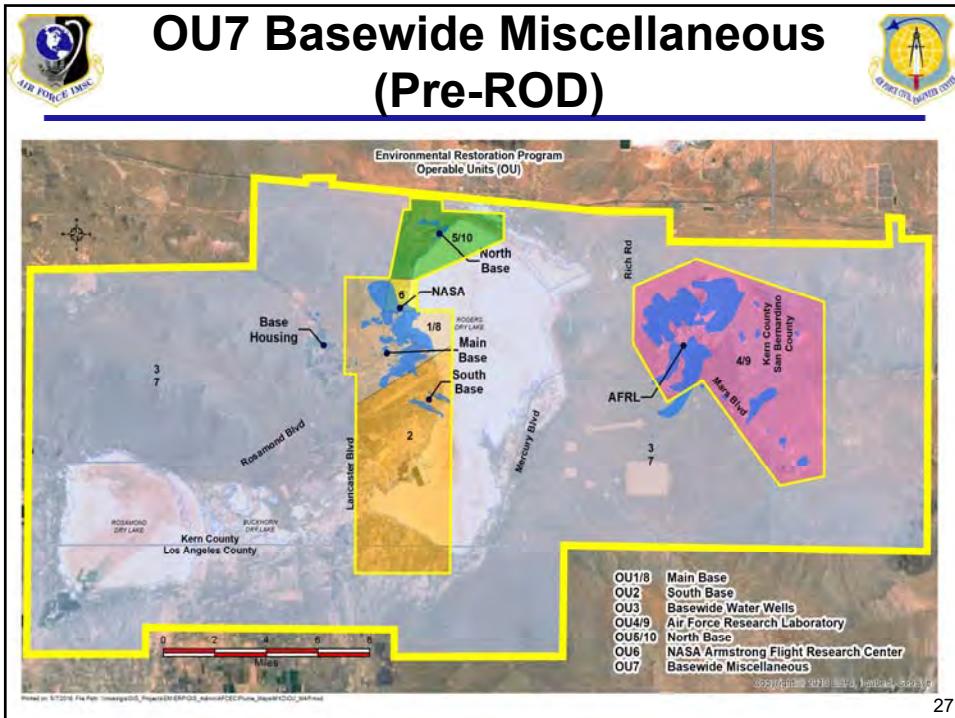


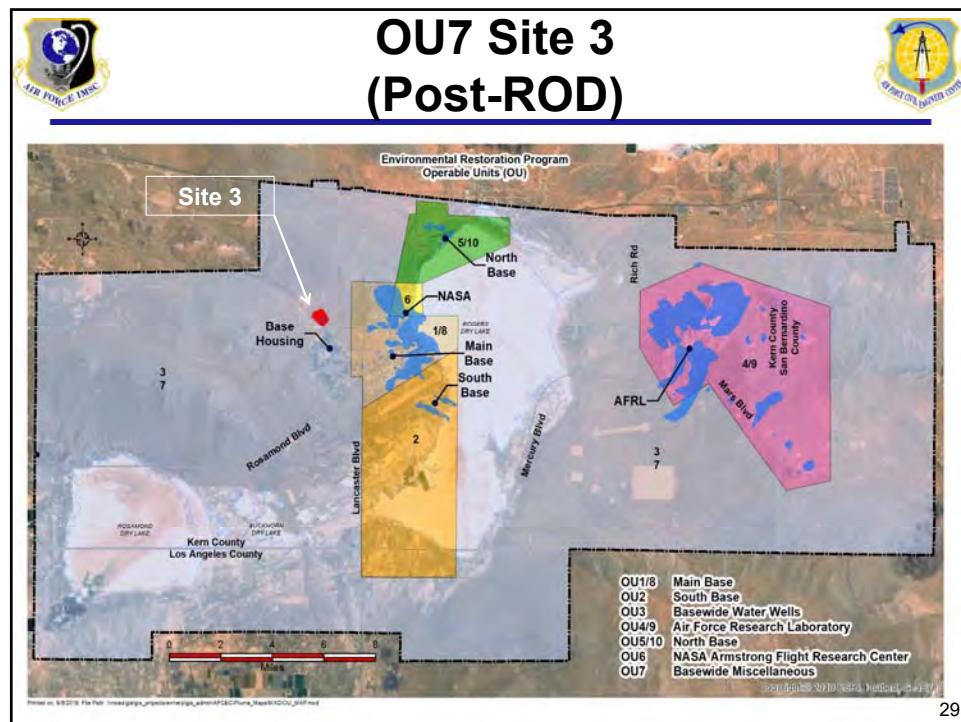
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OU6 NASA Armstrong (Post-ROD)

- Draft Groundwater Sampling and Analysis Plan was submitted to the regulators for comment on 12 March 2018
 - Plume delineation at Rogers Dry Lakebed
 - Initial hydropunch groundwater sampling has been completed
 - Placement/location of permanent plume delineation wells has been agreed to by the regulators and Air Force
 - Awaiting funding and contracting action from NASA Armstrong to install the wells





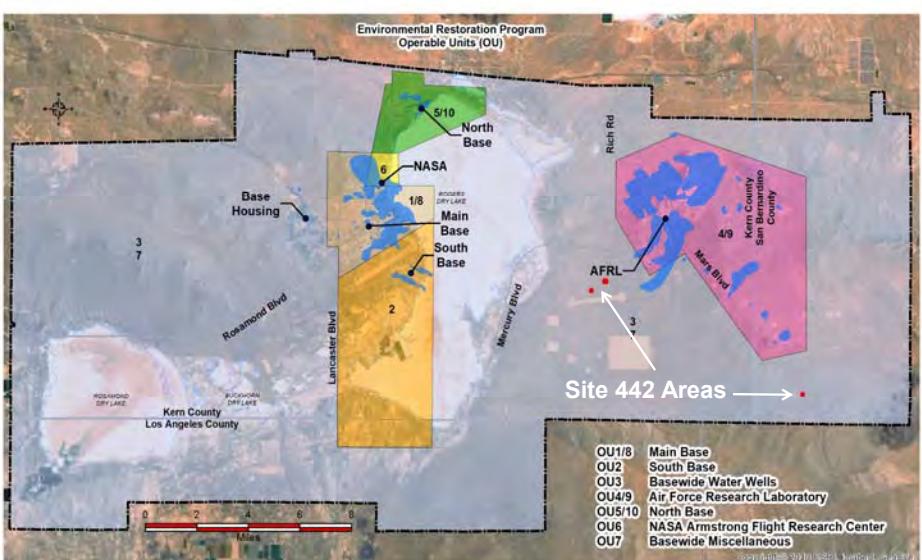
**OU7 Site 3
(Post-ROD)**

- The eastern portion of the landfill cover has been completed
- Funding has been approved to install the cover over the western portion of the landfill
- Funding includes fencing of the retention basin



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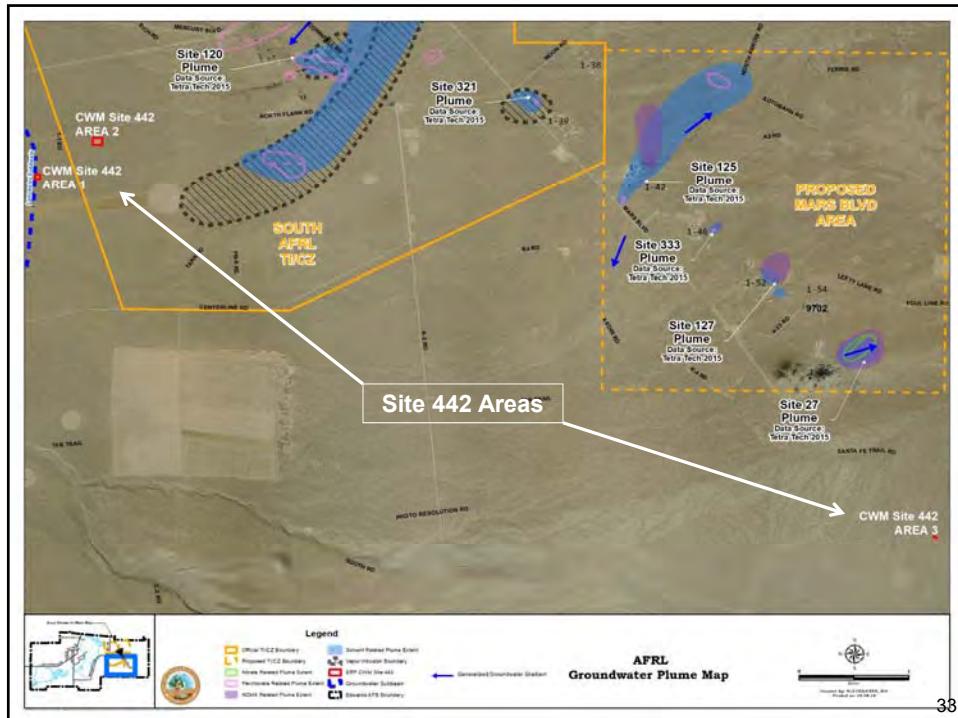
**OU7 Chemical Warfare Materiel
(Post-ROD)**



OU1/8	Main Base
OU2	South Base
OU3	Basewide Water Wells
OU4/9	Air Force Research Laboratory
OU5/10	North Base
OU6	NASA Armstrong Flight Research Center
OU7	Basewide Miscellaneous

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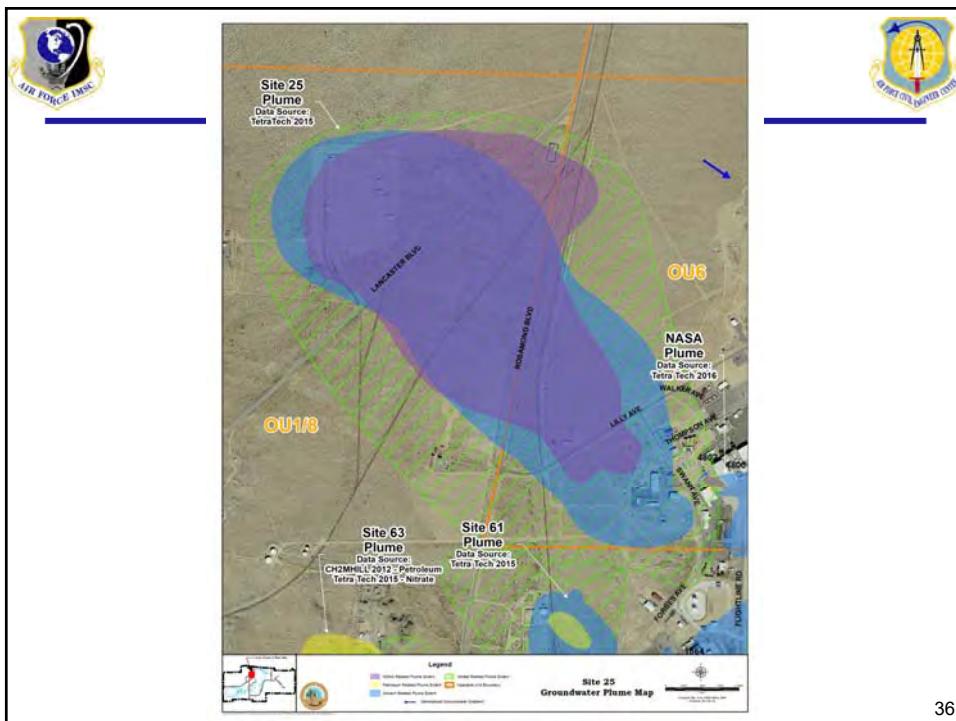
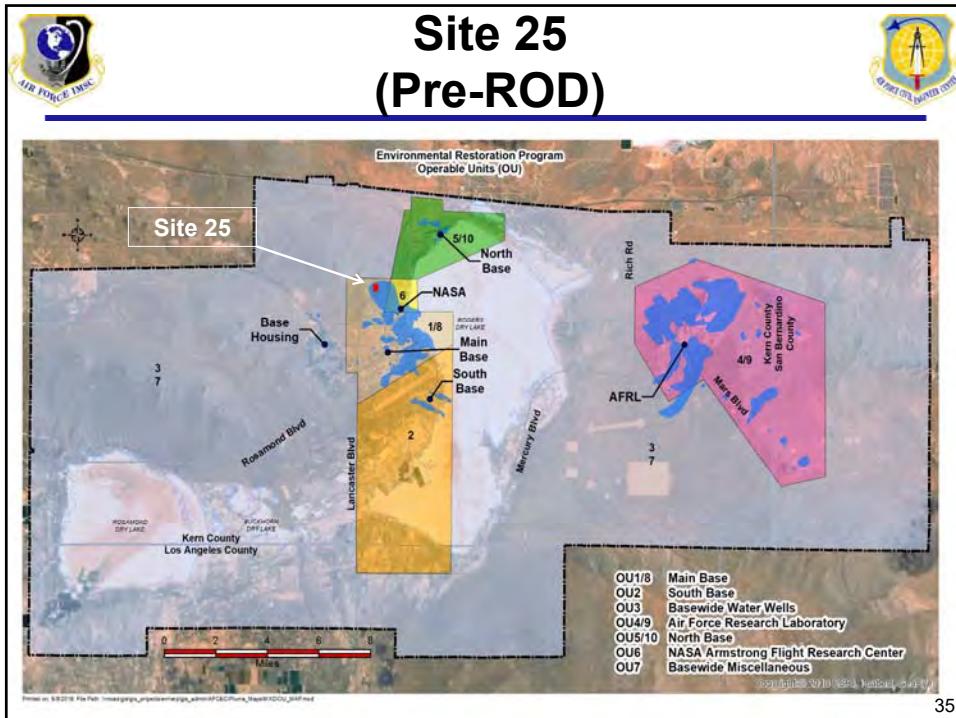
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OU7 Chemical Warfare Materiel (Post-ROD)

- Draft Site 442 Annual Remedial Action Status Report was submitted to the regulators and the Air Force responded to their comments
- Final document submission is anticipated on 4 June 2018
- Subject document will support the Second Site 442 Five-Year Review, which is planned to be submitted to the regulators as a draft in February 2019

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Site 25 (Pre-ROD)

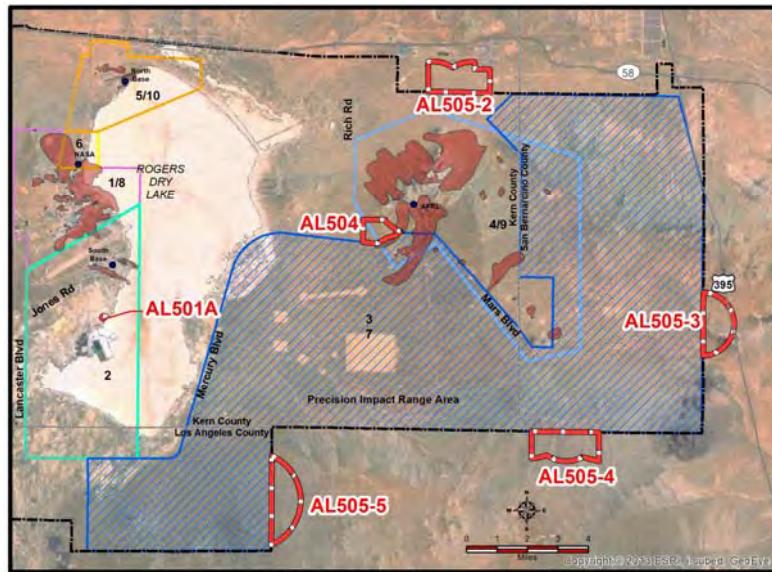


- Source Area and Plume Stability Technical Working Groups, comprised of Air Force and regulatory agency technical experts, are currently focusing on contaminant plume flow pathways using “state of the art” technology
- Several data collection efforts (generated from the Site 25 TWGs) are ongoing to feed a revised Feasibility Study

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Military Munitions Response Program (MMRP) (Pre-ROD)



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**MMRP
(Pre-ROD)**

- Site Inspection Report for AL505-3 and AL505-5
 - Draft final version planned for submittal to regulators in June 2018
- Remedial Investigation Report and Feasibility Study for AL501A, AL504, AL505-2, and AL505-4
 - Awaiting regulator comments on draft version

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FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE