



January 9, 2007  
10077.009

Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue  
Suite 400  
Portland, Oregon 97201-4987

VIA Email

**Attention:** Anna Coates

**Subject:** Progress Report – December 2006  
Remedial Investigation/Feasibility Study/Interim Removal Action Measures  
Astoria Area-Wide Petroleum Site  
Astoria, Oregon  
DEQ ECSI File #2277

Dear Ms. Coates:

This letter presents the progress made by the PRP Group during December 2006 on the RI/FS and IRAM development at the Astoria Area-Wide Petroleum Site in Astoria, Oregon. This work is being conducted in response to DEQ Order No. ECSR-NWR-01-11.

**WORK COMPLETED IN DECEMBER 2006**

Comments by the PRP Group on the draft RI Report were addressed during December. This effort will extend into January – February 2007.

A response to comments on the revised Contaminated Media Management Plan (CMMP) for the former Mobil/Niemi bulk plant was submitted to DEQ on December 27, 2006. The design of the vapor mitigation component of the IRAM was continued. Two monitoring wells identified as impeding property development were abandoned on December 7, 2006, in accordance with the DEQ-approved work plan. A third well was inaccessible because of soft ground and will be abandoned during the construction phase of the IRAM.

Cowlitz Clean Sweep (CCS) of Astoria, Oregon, performed monthly maintenance on the enhanced synthetic and floating absorbent boom system installed in Slip 2. The absorbent boom was replaced during December after damage from high winds and tides. Absorbent socks in monitoring wells containing free product were replaced monthly by CCS.

No meetings of the PRP Group representatives or with DEQ were held in December.



## **WORK PLANNED FOR JANUARY AND FEBRUARY 2007**

Active project work tasks include the following:

- A technical memorandum describing two rounds of sub-slab sampling at the Port office building will be completed after evaluation of the second round of sub-slab sampling, which was completed the week of September 18;
- Continued maintenance of the absorbent boom system in Slip 2;
- Submittal of IRAM design to DEQ and implementation of the IRAM Work Plan and CMMP for the redevelopment at the former Mobil/Niemi bulk plant property and construction of the IRAM;
- Preparation of documentation regarding the undocumented pipelines and structures found during the Bornstein Seafoods development;
- Documentation of reconstruction of three wells in Industry Street and abandonment of three wells at the former Chevron/McCall bulk plant will be submitted to DEQ;
- Abandonment of one additional monitoring well located in areas being redeveloped;
- Preparation of the Draft RI report incorporating comments from the PRP Group; and
- Review of the draft human health risk assessment report and preparation for submittal to DEQ.

An updated project schedule is attached to this progress report.

## **PROBLEMS ENCOUNTERED AND RESOLUTIONS**

There were no problems requiring resolution during the reporting period.

## **CLOSING COMMENTS**

Please call me at (503)768-5121 if you have any questions or comments regarding this progress report.

Sincerely,  
***EnviroLogic Resources, Inc.***

Thomas J. Galabrese, RG, CWRE  
Principal Hydrogeologist  
Project Manager

cc: Distribution list attached



**ASTORIA AREA-WIDE PETROLEUM SITE  
Distribution List**

- 1 Anna Coates, DEQ Project Manager, Site Response
  - 1 Peter Gearin, Port of Astoria
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  - 1 Gerry Koschal, Blasland, Bouck, and Lee, Consultant for Chevron Environ. Management Co.
  - 1 Brian Jacobson, Qwest Communications International, Inc.
  - 1 David Bledsoe, Perkins Coie LLP, Attorney for Qwest Communications International, Inc.
  - 1 Anita W. Lovely, Lovely Consulting, Inc., Consultant for ExxonMobil Corporation
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-



**UPDATED SCHEDULE (1/9/07)**

**Remedial Investigation/Feasibility Study  
Astoria Area-Wide Petroleum Site  
Astoria, Oregon**

ID	Task Description	Duration	Start	Finish	Complete	Predecessors
1	<b>ASTORIA AREA-WIDE PETROLEUM STUDY</b>	1531 days	1/9/2002	1/30/2008		
2						
3	RI/FS and IRAM PROPOSAL	11 days	1/9/2002	1/21/2002	100%	
4						
17						
18	RI/FS and IRAM DEVELOPMENT WORK PLAN	124 days	1/9/2002	7/1/2002	100%	
19						
58						
59	<b>PHASE 1/2 RI/FS and IRAM WORK PLAN IMPLEMENTATION</b>	1530 days	1/9/2002	1/29/2008		
60						
61	<b>SOURCE/SOIL CHARACTERIZATION</b>	709 days	1/9/2002	11/1/2004	100%	
62	Phase 1 Source/Soil Characterization	269 days	1/9/2002	1/27/2003		
99	Phase 2 Soil Characterization	375 days	4/30/2003	11/1/2004		
124						
125	<b>GROUND-WATER CHARACTERIZATION</b>	1117 days	8/12/2002	1/26/2007	100%	
126	Water-Level Measurement Program	524 days	8/12/2002	9/14/2004		
157	Beneficial Ground Water and Land Use Studies	126 days	8/27/2002	2/21/2003		
164	Monitoring-Well Installation Program	365 days	8/20/2002	2/5/2004		
185	Quarterly Ground-Water Monitoring Program	281 days	10/8/2003	11/23/2004		
230	Hydraulic Characterization Program (NOT CURRENTLY PLANN)	46 days	3/1/2004	5/4/2004		
238	Monitoring Well Maintenance	277 days	12/19/2005	1/26/2007	95%	
239	Abandon MW-46, 47, and 48/Maintenance MW 17, 18, and 2	115 days	12/19/2005	6/2/2006	100%	
252	Abandon MW 35, 39, and 45	60 days	10/30/2006	1/26/2007	95%	
253	Draft Work Plan	4 days	10/30/2006	11/2/2006		
254	PRP Group Review	3 days	11/3/2006	11/7/2006		253
255	Final Work Plan	2 days	11/8/2006	11/9/2006		254
256	Mobilization/Demobilization	1 day	12/5/2006	12/5/2006		255FS+15 days
257	Well Abandonment MW-46, 47, 48	2 days	12/6/2006	12/7/2006		256
258	IDW Management	20 days	12/8/2006	1/9/2007		257
259	Draft Reconstruction/Abandonment Documentation	5 days	1/10/2007	1/16/2007		258
260	PRP Group Review	5 days	1/17/2007	1/23/2007		259
261	Final Reconstruction/Abandonment Documentation	2 days	1/24/2007	1/25/2007		260
262	Submittal to DEQ	1 day	1/26/2007	1/26/2007		261
263	Project Management	49 days	10/30/2006	1/11/2007		253SS
264						
265	<b>STORM/SURFACE WATER CHARACTERIZATION</b>	586 days	8/19/2002	12/20/2004	100%	
266	Storm Water Monitoring Plan	117 days	8/19/2002	1/31/2003		
270	Quarterly Storm Water Monitoring Program	309 days	9/23/2003	12/20/2004		
315						
316	<b>SEDIMENT CHARACTERIZATION</b>	100 days	6/13/2003	11/4/2003	100%	
317	Phase 1 Sediment Characterization	100 days	6/13/2003	11/4/2003		
328						
329						
330	<b>IRAM DEVELOPMENT</b>	1420 days	5/13/2002	12/31/2007		
331	Indoor Air Quality IRAM Development	1037 days	12/27/2002	2/20/2007		
332	Comparison of Soil Data to Screening Levels	10 days	12/27/2002	1/10/2003	100%	81
333	Indoor Air IRAM Development	951 days	4/30/2003	2/20/2007		
334	Air Quality Sampling Work Plan	299 days	4/30/2003	7/15/2004	100%	
340	Vapor Intrusion Pathway Sampling	180 days	8/20/2004	5/9/2005	100%	167
360	Sub-Slab Sampling	463 days	4/18/2005	2/20/2007	90%	
361	Draft Sub-Slab Sampling Work Plan Preparation	32 days	4/18/2005	6/1/2005	100%	
362	PRP Group Review	5 days	6/2/2005	6/8/2005	100%	361
363	Final Sub-Slab Sampling Work Plan	10 days	6/9/2005	6/22/2005	100%	362
364	Submittal to DEQ	1 day	6/23/2005	6/23/2005	100%	363
365	Sub-Slab Probe Installation	3 days	8/9/2005	8/11/2005	100%	364FS+30 days
366	Soil Vapor Sampling	2 days	8/12/2005	8/15/2005	100%	365
367	Laboratory Analyses	10 days	8/16/2005	8/29/2005	100%	366
368	Data Validation	10 days	8/30/2005	9/13/2005	100%	367
369	Analytical Data Compilation	5 days	9/14/2005	9/20/2005	100%	368
370	Draft Sub-Slab Sampling TM	40 days	10/19/2005	12/15/2005	80%	369FS+20 days
371	PRP Group Review	5 days	12/16/2005	12/22/2005		370
372	Final Sub-Slab Sampling TM	5 days	12/27/2005	1/3/2006		371
373	Submittal to DEQ	1 day	1/4/2006	1/4/2006		372
374	<b>Round 2 Sub Slab Sampling</b>	295 days	12/16/2005	2/20/2007	75%	
375	Authorization to Proceed	50 days	12/16/2005	3/1/2006		370
376	Mitigation System Eval, Telecons, Pressure Mor	100 days	3/2/2006	7/24/2006		375
377	Confirmation from DEQ re Spatial/Temporal Dist	1 day	5/10/2006	5/10/2006		
378	Mobilization	15 days	8/21/2006	9/11/2006		375,377
379	Sub-Slab Probe Installation	1 day	9/18/2006	9/18/2006		378FS+4 days
380	Soil Vapor Sampling	1 day	9/18/2006	9/18/2006		379SS
381	Laboratory Analyses	10 days	9/19/2006	10/2/2006		380
382	Data Validation	5 days	10/3/2006	10/9/2006		381
383	Analytical Data Compilation	5 days	10/10/2006	10/16/2006		382
384	Draft R1 and R2 Sub-Slab Sampling Data TM	70 days	10/17/2006	1/29/2007		383
385	PRP Group Review	10 days	1/30/2007	2/12/2007		384
386	Final R1 and R2 Sub-Slab Sampling Data TM	5 days	2/13/2007	2/19/2007		385
387	Submittal to DEQ	1 day	2/20/2007	2/20/2007		386
388	<b>HVAC Adjustments - IRAM</b>	160 days	2/28/2005	10/13/2005	100%	
396	<b>HYDROCARBON SEEP IRAM DEVELOPMENT</b>	1146 days	6/12/2003	12/31/2007		
397	Bail-Down Testing	3 days	6/12/2003	6/16/2003	100%	139
398	Water Quality Sampling at Seep MWs	2 days	6/17/2003	6/18/2003	100%	397
399	Product Removal	125 days	6/16/2003	12/15/2003	100%	
407	2004 A Product Removal	107 days	1/12/2004	6/10/2004	100%	
414	2004 B Product Removal	106 days	7/19/2004	12/16/2004	100%	
421	2005 Product Removal	192 days	3/30/2005	1/4/2006	100%	

**UPDATED SCHEDULE (1/9/07)**

**Remedial Investigation/Feasibility Study  
Astoria Area-Wide Petroleum Site  
Astoria, Oregon**

ID	Task Description	Duration	Start	Finish	Complete	Predecessors
432	2006 Product Removal	234 days	1/30/2006	1/4/2007	100%	
445	2007 Product Removal	260 days	1/2/2007	12/31/2007	0%	
446	Hydrocarbon Seep IRAM Work Plan	67 days	6/17/2003	9/22/2003	100%	
452	Hydrocarbon Seep IRAM Implementation	771 days	11/24/2003	12/28/2006		
453	IRAM Design/Build	206 days	11/24/2003	9/24/2004	100%	
462	O&M 2005 Month	192 days	3/10/2005	12/12/2005	100%	
473	O&M Boom 2006	230 days	1/30/2006	12/28/2006	100%	
486	O&M Boom 2007	260 days	1/2/2007	12/31/2007	0%	
487	Upland Data Collection	401 days	1/23/2004	8/25/2005	100%	
488	UDC Work Plan	141 days	1/23/2004	8/12/2004	100%	
493	UDC Implementation	71 days	9/13/2004	12/22/2004	100%	
499	UDC Technical Memorandum	169 days	12/23/2004	8/25/2005	100%	
504	Additional Product Characterization	229 days	2/24/2005	1/23/2006		
505	Work Plan Preparation	128 days	2/24/2005	8/25/2005	100%	
510	Field Preparation	11 days	8/26/2005	9/12/2005	100%	
513	Drilling Program	3 days	9/14/2005	9/16/2005	100%	
516	Analytical Program	50 days	9/19/2005	11/29/2005	100%	
520	Reporting (included in RI Report)	229 days	2/24/2005	1/23/2006	0%	
526	Balldown Testing/Water Level Monitoring	15 days	5/15/2006	6/5/2006	90%	
534	TANK-BOTTOM WASTE IRAM DEVELOPMENT (McCALL BP)	915 days	5/13/2002	1/9/2006	95%	
535	Technology Screening	10 days	5/13/2002	5/24/2002		44
536	Detailed Evaluation of Alternatives	10 days	5/28/2002	6/10/2002		535
537	Implementation Plan Proposal	5 days	6/11/2002	6/17/2002		536
538	Review IRAM Implementation Report	5 days	1/3/2006	1/9/2006		167FS+665 days
539	FORMER MOBIL/NIEMI BULK PLANT IRAM	684 days	9/7/2004	5/25/2007		
540	IRAM Work Plan	120 days	9/7/2004	3/1/2005	100%	
541	Draft IRAM Work Plan Preparation	46 days	9/7/2004	11/9/2004		
542	PRP Group Review	10 days	11/10/2004	11/23/2004		541
543	Final IRAM Work Plan	15 days	11/24/2004	12/16/2004		542
544	Submittal to DEQ	1 day	12/17/2004	12/17/2004		543
545	Work Plan Revisions	45 days	12/20/2004	2/24/2005		544
546	DEQ Approval	3 days	2/25/2005	3/1/2005		545
547	UST Removal	48 days	9/20/2004	11/24/2004	100%	
565	IRAM Implementation	564 days	3/2/2005	5/25/2007		
566	Vapor Barrier/Extraction Design	486 days	3/2/2005	2/6/2007	95%	
567	Acquire Building Plans (dependent on Developer)	350 days	3/2/2005	7/21/2006		546
568	Conceptual Design	30 days	7/24/2006	9/1/2006		567
569	PRP Group Review	10 days	9/5/2006	9/18/2006		568
570	Draft Vapor Barrier/Extraction Design	30 days	9/19/2006	10/30/2006		569
571	PRP Group Review	15 days	10/31/2006	11/20/2006		570
572	Final Vapor Barrier/Extraction Design	30 days	11/21/2006	1/8/2007		571
573	Submittal to DEQ	1 day	1/9/2007	1/9/2007		572
574	DEQ Approval	20 days	1/10/2007	2/6/2007		573
575	Project Management	39 days	9/19/2006	11/10/2006		570SS
576	Vapor Barrier/Extraction Construction	12 days	2/21/2007	3/8/2007	0%	
577	Mobilization/Demobilization	2 days	2/21/2007	2/22/2007		574FS+10 days
578	Drilling/SVE Well Installation	5 days	2/23/2007	3/1/2007		577
579	Vapor Barrier Construction Oversight	10 days	2/23/2007	3/8/2007		577
580	Contaminated Media Management Plan	123 days	6/29/2006	12/27/2006	100%	
581	Draft CMM Plan Preparation	15 days	6/29/2006	7/12/2006		567FS-15 days
582	PRP Group Review	5 days	7/24/2006	7/28/2006		581
583	Final CMM Plan	5 days	7/31/2006	8/4/2006		582
584	Submittal to DEQ	1 day	8/7/2006	8/7/2006		583
585	Revised CMM Plan	15 days	10/4/2006	10/24/2006		584FS+40 days
586	Submittal to DEQ	1 day	10/25/2006	10/25/2006		585
587	Prep Response to DEQ comments/Document site act	20 days	11/16/2006	12/15/2006		586FS+15 days
588	PRP Group Review	5 days	12/18/2006	12/26/2006		587
589	Submittal to DEQ	1 day	12/27/2006	12/27/2006		588
590	Site Preparation Support	97 days	8/8/2006	12/27/2006		
591	Soil Stockpile Removal	3 days	9/6/2006	9/8/2006		584FS+20 days
592	Subsurface Structure Removal	3 days	8/8/2006	8/10/2006		584
593	Prepare documentation	20 days	11/16/2006	12/15/2006		587SS
594	PRP Group Review	5 days	12/18/2006	12/26/2006		593
595	Submittal to DEQ	1 day	12/27/2006	12/27/2006		594
596	IRAM Implementation Technical Memorandum	56 days	3/9/2007	5/25/2007	0%	
597	Draft IRAM Implementation TM Preparation	40 days	3/9/2007	5/3/2007		579
598	PRP Group Review	10 days	5/4/2007	5/17/2007		597
599	Final IRAM Implementation TM	5 days	5/18/2007	5/24/2007		598
600	Submittal to DEQ	1 day	5/25/2007	5/25/2007		599
601	COMMUNITY RELATIONS ACTIVITIES	1196 days	4/30/2003	1/29/2008		167
602						
603	PROJECT MANAGEMENT	1381 days	7/10/2002	12/31/2007		
604	Phase 1 PM	257 days	7/10/2002	7/15/2003	100%	
625	Phase 2 PM	164 days	4/30/2003	12/30/2003	100%	
648	2004 A PM	242 days	1/5/2004	12/16/2004	100%	
693	2005 PM	597 days	8/8/2003	12/31/2005	100%	
736	2006 PM	250 days	1/3/2006	12/29/2006	100%	
778	2007 PM	260 days	1/2/2007	12/31/2007	0%	
779						
780	REMEDIAL INVESTIGATION REPORT PREPARATION	679 days	11/10/2004	7/23/2007	90%	
781	RI Report Outline	300 days	11/10/2004	1/24/2006	100%	650FS+208 days
782	RI Data Elements Compilation	90 days	2/24/2005	6/30/2005	100%	781SS+70 days,204
783	Data Interpretation	75 days	7/5/2005	10/18/2005	100%	782,120,289,324,204,500S!
784	Draft RI Report	150 days	10/19/2005	5/24/2006	100%	783

**UPDATED SCHEDULE (1/9/07)**

**Remedial Investigation/Feasibility Study  
Astoria Area-Wide Petroleum Site  
Astoria, Oregon**

ID	Task Description	Duration	Start	Finish	Complete	Predecessors
785	<b>PRP Group Review</b>	41 days	5/25/2006	7/25/2006	100%	784
790	Final Internal Draft RI Report	140 days	7/26/2006	2/14/2007	90%	785
791	PRP Group Review	30 days	2/15/2007	3/28/2007		790
792	Final Draft RI Report	20 days	3/29/2007	4/25/2007		791
793	DEQ Review	30 edays	4/25/2007	5/25/2007		792
794	Final RI Report	20 days	5/28/2007	6/22/2007		793
795	DEQ Approval	1 day	7/23/2007	7/23/2007		794FS+30 edays
796						
797	<b>RISK ASSESSMENT</b>	728 days	3/1/2004	1/23/2007		
798	<b>HUMAN HEALTH RISK ASSESSMENT</b>	420 days	5/19/2005	1/23/2007	60%	
799	<b>Human Health Risk Assessment Work Plan</b>	194 days	5/19/2005	2/28/2006	100%	81,193,324,278
800	Scoping/Data Management	20 days	5/19/2005	6/16/2005	100%	782FS-30 days
801	Draft HHRA Work Plan	29 days	6/17/2005	7/29/2005	100%	800
802	PRP Group Review	10 days	8/1/2005	8/12/2005		801
803	Meeting with DEQ	2 days	7/8/2005	7/11/2005	100%	801SS+13 days
804	Final Draft HHRA Work Plan	5 days	8/15/2005	8/19/2005	100%	802
805	PRP Group Review	5 days	8/22/2005	8/26/2005	100%	804
806	Final HHRA Work Plan	29 days	8/29/2005	10/7/2005	100%	805
807	Submittal to DEQ	1 day	10/10/2005	10/10/2005	100%	806
808	Prep Response to Comments	55 days	12/8/2005	2/28/2006		807FS+40 days
809	<b>Risk Assessment Report</b>	226 days	3/1/2006	1/23/2007	95%	
810	DEQ Approval of Work Plan	50 days	3/1/2006	5/9/2006	100%	808
811	Draft HHRA Report	45 days	5/10/2006	7/14/2006	100%	807FS+40 days,783,810
812	PRP Group Review	10 days	7/17/2006	7/28/2006	100%	811
813	Final Draft HHRA Report	110 days	7/31/2006	1/8/2007	95%	812
814	PRP Group Review	10 days	1/9/2007	1/22/2007		813
815	Submittal to DEQ	1 day	1/23/2007	1/23/2007		814
816	Project Management	66 days	5/10/2006	8/14/2006		800SS,810
817	<b>ECOLOGICAL EVALUATION</b>	685 days	3/1/2004	11/16/2006	100%	
818	<b>Level 1 Ecological Evaluation</b>	185 days	3/1/2004	11/18/2004	100%	
827	<b>Ecological Risk Assessment Work Plan Development</b>	101 days	4/18/2005	9/9/2005	100%	
832	<b>Level 2 Ecological Evaluation (REPLACED WITH ERA, below)</b>	194 days	3/8/2004	12/11/2004	100%	
841	<b>Ecological Risk Assessment</b>	259 days	11/7/2005	11/16/2006	100%	
842	Response to Comments	20 days	12/13/2005	1/12/2006		
843	Meetings and Project Management	89 days	1/17/2006	3/17/2006		831FS+40 days
844	ERA Field Program	10 days	1/27/2006	1/27/2006		831FS+85 days,842
845	Laboratory Analyses	30 days	1/30/2006	3/13/2006		844
846	Data Analysis	19 days	3/14/2006	4/7/2006		845
847	Draft ERA Report	25 days	4/10/2006	5/12/2006		846
848	PRP Group Review	20 days	5/15/2006	6/12/2006		847
849	Final ERA Report	60 days	6/13/2006	9/7/2006		848
850	Submittal to DEQ	10 days	9/8/2006	9/21/2006		849
851	DEQ Approval of ERA	40 days	9/22/2006	11/16/2006		850
852						
853	<b>FEASIBILITY STUDY</b>	190 days	5/10/2007	1/30/2008	0%	
854	<b>Feasibility Study Work Plan</b>	77 days	5/10/2007	8/24/2007		
855	Establish Remedial Action Objectives	5 days	5/10/2007	5/16/2007		783,120,193,500,815,790FS
856	Identify General Response Actions	10 days	5/17/2007	5/30/2007		855
857	Determine Preliminary Remediation Goals	5 days	5/31/2007	6/6/2007		856
858	ID/Screen Remedial Technologies	10 days	6/7/2007	6/20/2007		857,847
859	Draft Feasibility Study Work Plan	10 days	6/21/2007	7/4/2007		858
860	PRP Group Review	10 days	7/5/2007	7/18/2007		859
861	Final Feasibility Study Work Plan	5 days	7/19/2007	7/25/2007		860
862	DEQ Review	30 edays	7/25/2007	8/24/2007		861
863	<b>Feasibility Study Evaluation</b>	40 days	8/27/2007	10/19/2007		
864	Assemble/Screen Remedial Alternatives	10 days	8/27/2007	9/7/2007		862
865	Detailed Analysis	15 days	9/10/2007	9/28/2007		864
866	Compare Remedial Alternatives	10 days	10/1/2007	10/12/2007		865
867	Recommend Preferred Alternative	5 days	10/15/2007	10/19/2007		866
868	<b>Reporting</b>	73 days	10/22/2007	1/30/2008		
869	Draft FS Report	15 days	10/22/2007	11/9/2007		867
870	PRP Group Review	10 days	11/12/2007	11/23/2007		869
871	Final Draft FS Report	10 days	11/26/2007	12/7/2007		870
872	Submittal to DEQ	1 day	12/10/2007	12/10/2007		871
873	DEQ Review	30 edays	12/10/2007	1/9/2008		872
874	Final FS Report	15 days	1/10/2008	1/30/2008		873
875						