STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

In the Matter of Remedial Action by: The Port of Tacoma Tacoma Port Earley Business Center 401 East Alexander Avenue Tacoma, WA 98421	First Amendment to AGREED ORDER No. DE 9553

TO: Port of Tacoma
Attention: Eric Johnson
One Sitcum Plaza
Tacoma, WA 98421

I. INTRODUCTION

Agreed Order No. DE 9553 (Order), entered into by the State of Washington, Department of Ecology (Ecology) and the Port of Tacoma (Port) on April 2, 2013, requires the Port to perform remedial actions in response to releases of hazardous substances at the Earley Business Center Site (Site). The Order requires the Port to compile information and data from the previously performed investigations, conduct a Remedial Investigation/Feasibility Study to document the full nature and extent of contaminants and identify cleanup alternatives for the Site, and prepare and submit a preliminary draft Cleanup Action Plan based on the findings of the Feasibility Study. In addition, the Port completed an interim action to remove certain underground storage tanks at the Site.

Ecology and the Port hereby agree to this First Amendment to the Order. Under this First Amendment to the Order, the Port will prepare a supplemental remedial investigation work plan, perform a supplemental remedial investigation and feasibility study, and prepare a preliminary draft cleanup action plan.

This Amendment does not attempt to recite all provisions of the Order. Provisions of the Order not specifically addressed in this Amendment remain in full force and effect. Format and section numbering of the Order have been maintained to the extent possible.

II. JURISDICTION

This First Amendment to Agreed Order No. DE 9553 is issued pursuant to the authority of the Model Toxics Control Act (MTCA), RCW 70A.305.050(1).

III. AMENDMENT

Agreed Order No. DE 9553, Section IV, DEFINITIONS, Subsection A, is amended as follows:

Agreed Order DE 9553 (Order) defined the Earley Business Center Site as consisting of areas impacted by discrete or severable releases of contamination from past property operations, referred to as 'subareas.' Seven subareas were identified in the Order and described individually in Section V, Findings of Fact. These subareas were defined based on previous investigations that identified similar contaminants and similar potential sources within the subareas. The subareas were collectively referred to as the 'Earley Business Center Site' in the Agreed Order. The Agreed Order identified the subareas as facilities under RCW 70A.305.020(8)(b). By this Amendment 1 to Agreed Order DE 9553, Subsection A of Section IV of the Order is redefined to include the entire EBC property as a single facility, as defined below, rather than a group of discreet subareas. Section IV, Subsection A of the Order is replaced as follows:

The Earley Business Center Site is defined as follows:

A. Site: The Site is referred to as Tacoma Port Earley Business Center. The Site is defined by where a hazardous substance, other than a consumer product in consumer use, has been deposited, stored, disposed of, or placed, or otherwise come to be located. Based upon factors currently known to Ecology, the Site generally includes property at 401 East Alexander Avenue and the northwesterly 620 feet of 500 East Alexander Avenue, Tacoma, Washington 98421. Contamination coming to be located on Tacoma Port Earley Business Center from the adjacent Occidental Chemical Corporation (OCC) site and at the south 400 feet at Pier 25 is being addressed separately under Agreed Order DE 16943 between OCC and Ecology. Exhibit A is superseded by Exhibit F—Site Location Diagram, attached to this Amendment, showing the Tacoma Port Earley Business Center Site.

Agreed Order No. DE 9553, Section V, FINDINGS OF FACT, Subsection G, is amended to revise the following:

By this Amendment 1 to Agreed Order DE 9553, the following facts relate to site or areas that are *not covered* as part of the EBC Site or under this Order:

Pier 24 and 25 Embankment Remediation Site. As mentioned in the Order for that site (Section V, Subsection G [2]), the Port completed sediment remedial actions at EBC Piers 24 and 25 in accordance with requirements of the Remedial Design/Remedial Action (RD/RA) Consent Decree with the Environmental Protection Agency (EPA) (CD – Civil Action No. CO5-5103 FDB), dated

January 14, 2005. The CD for that site requires the Port of Tacoma (Port) and OCC to complete RD/RA activities associated with the Mouth of the Hylebos Waterway Problem Area of the Commencement Bay Nearshore/Tideflats (CB/NT) Superfund Site. The Project area includes intertidal and subtidal areas along a total shoreline embankment length of approximately 1,200 feet in the northeast corner of the peninsula. Remediation for the project generally included capping the embankment slopes below approximately elevation 15 to 16 mean lower low water (MLLW) beneath Pier 24 and Pier 25 as described in the Final Remediation Action Construction Report. That site is currently being overseen by EPA and is in post-construction long-term monitoring.

Agreed Order No. DE 9553, Section VII, WORK TO BE PERFORMED, Subsection G is amended to revise the following:

The frequency of progress reports is changed from monthly to quarterly.

Agreed Order No. DE 9553, Section VII, WORK TO BE PERFORMED is amended to add the following:

The following Supplemental Scope of Work is added as Subsection J:

Work to be performed includes a supplemental remedial investigation work plan including a historical data usability technical memorandum and conceptual site model, supplemental remedial investigation, remedial investigation report, feasibility study report, and preliminary draft cleanup action plan. All these actions will be conducted in accordance with WAC 173-340-350 through WAC 173-340-390 and the scope of work and schedule attached to this Amendment as Exhibit G, unless otherwise specifically provided for herein. Exhibit G is hereby incorporated by reference and is made a fully enforceable part of this Order.

Agreed Order No. DE 9553, Section VIII, TERMS AND CONDITIONS OF ORDER, Subsection D, is amended to revise the following:

The Ecology Project Coordinator is changed to:

Sandy Smith
Department of Ecology,
Southwest Region Office
PO Box 47775,
Olympia WA 98504- 7775
360-999-9588

The Port of Tacoma Project Coordinator is changed to:

Rob Healy
Port of Tacoma
1 Sitcum Plaza
Tacoma, WA 98421
253-428-8643

Agreed Order No. DE 9553, Section VIII, TERMS AND CONDITIONS OF ORDER, Subsection H, is amended to revise the following:

Citizens for a Healthy Bay is removed as a document repository location.

Agreed Order No. DE 9553, Exhibit B, is amended to revise the following:

Exhibit B, Site Legal Description, is removed from the Order.

Effective date of this First Amendment to Agreed Order No. DE 9553: November 27, 2023

THE PORT OF TACOMA

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STATE OF WASHINGTON,
DEPARTMENT OF ECOLOGY

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Exhibit F
Site Location Diagram

Earley Business Center
401 Alexander Ave
Tacoma, WA

Parcel No.
50003500013

Legend
Yellow line – Port of Tacoma Early Business Center

Blue dash - Pier 24 and 25 Embankment Remediation Site

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EXHIBIT G
SUPPLEMENTAL SCOPE OF WORK AND SCHEDULE
Tacoma Port Earley Business Center

The scope of work under this Agreed Order Amendment 1 includes a Supplemental Remedial Investigation Work Plan including a Historical Data Usability Technical Memorandum and a Conceptual Site Model (CSM), Supplemental Remedial Investigation (RI), RI Report, Feasibility Study (FS) Report, and preliminary draft Cleanup Action Plan (dCAP). The purpose of this amendment is to provide sufficient data, analysis, and evaluations to enable Ecology to select a cleanup alternative for the entire Site rather than focusing solely on previously identified subareas. The Port shall coordinate with Ecology throughout the development of the RI, FS, and preliminary dCAP and shall keep Ecology informed of changes to any Work Plan or other project plans, and of any issues or problems as they develop. Work completed for this scope of work will meet the requirements of the Model Toxics Control Act Regulation and Statute, WAC 173-340 and RCW 70A.305; and the Sediment Management Standards, WAC 173-204.

For each version of each deliverable identified in this scope of work, the Port shall submit to Ecology one (1) printed copy, plus one electronic copy each in Word (.docx) and Adobe (.pdf) formats. Up to five (5) additional printed copies of deliverables may be required for public comment periods and document repositories.

The five major tasks of the Scope of Work (SOW) are as follows:

Task 1. Supplemental Remedial Investigation Work Plan

Subtask 1a. Historical Data Usability Technical Memorandum

Subtask 1b. Conceptual Site Model

Task 2. Supplemental Remedial Investigation and Remedial Investigation Report

Task 3. Feasibility Study Report

Task 4. Preliminary Draft Cleanup Action Plan

Task 5. SEPA Support

TASK 1: SUPPLEMENTAL REMEDIAL INVESTIGATION WORK PLAN

The Port shall prepare a Supplemental Remedial Investigation Work Plan (Work Plan) in compliance with WAC 173-340-350 and WAC 173-204-550. The Work Plan shall include an overall description and schedule of all supplemental RI activities, a historical data usability review (Subtask 1a) and conceptual site model (CSM) (Subtask 1b). The Work Plan shall clearly describe the project management strategy for implementing and reporting on supplemental RI activities and include an outline of the responsibility and authority of all organizations and key personnel involved in conducting the RI.

SUBTASK 1A: HISTORICAL DATA USABILITY TECHNICAL MEMORANDUM

The Port will prepare a Historical Data Usability Technical Memorandum as Subtask 1a of the Supplemental Remedial Investigation Work Plan to document assessment of existing data for usability and conformance with acceptance criteria for future use on the project. The historical data usability assessment will evaluate the project for conformance with WAC 173-340-830; the site-specific Work Plan (Crete 2014); and industry-accepted practices for sample collection, handling, and preparation. Verification and validation of existing analytical data will be documented and evaluated for general conformance with the applicable EPA National Functional Guidelines for Data Review. The output of the historical data usability assessment will include an updated electronic project database and data usability memorandum. The Historical Data Usability Technical Memorandum will screen usable project data against preliminary cleanup levels (pCULs) including all applicable state and federal laws and risk equations, and other requirements in WAC 173-340-720 through 173-340-760.

SUBTASK 1B: CONCEPTUAL SITE MODEL

The Port will prepare a Conceptual Site Model (CSM) as a subtask of the Supplemental Remedial Investigation Work Plan (Work Plan). The intent of the CSM is to help visualize and understand available site information and support project planning and decision-making for the Site. A CSM is a living document that will be refined as new information and data are obtained. The CSM will identify known or suspected sources of hazardous substances, types and concentrations of hazardous substances, potentially contaminated media, and actual and potential exposure pathways and receptors (WAC 173-340-200). The CSM will include information on all current and historical underground storage tanks (USTs). The Port and Ecology shall meet, as needed, to discuss an outline and organization for the CSM before the Port drafts the CSM Report.

The updated database and Conceptual Site Model (Task 1b) will be used to identify data gaps to be filled during the supplemental remedial investigation field activities.

The Port and Ecology will participate in an RI Planning Meeting before submittal of the supplemental RI Work Plan. The purpose of the RI Planning Meeting is to review the results of the historical data usability assessment, discuss the preliminary CSM and requirements for the supplemental RI Work Plan, plan supplemental RI fieldwork, and identify project data needs and possible interim actions. The Work Plan will consider the type, quality, and quantity of data necessary to support selection of a cleanup action. The Work Plan also will identify specific data collection procedures in a Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP) in compliance with WAC 173-340-820 and WAC 173-204-600 for defining the nature and extent of contamination. Analytical data to be used for regulatory compliance or

delineation purposes will be obtained using standard and appropriate analytical methods, consistent with WAC 173-340-830. The Quality Assurance Project Plan (QAPP) will be prepared in accordance with Ecology's current *Guidelines for Preparing Quality Assurance Project Plans for Environmental Studies, Publication No. 04-03-030* (2004, revised December 2016); and *Sediment Cleanup User's Manual, Publication No. 12-09-057* (Ecology 2021). Analytical data verification and validation shall be performed to at least EPA Stage 2B and in general conformance with current EPA National Functional Guidelines for Data Review (EPA 2020)[1]. Proposed data validation and verification methods that differ from the national functional guidelines shall be presented in the site-specific QAPP. Laboratories must meet the accreditation standards established in WAC 173-50. The Port will also submit a copy of the Health and Safety Plan (HASP) for the project.

The Port or their contractors shall submit all new sampling data generated under this Work Plan and any other recently collected data to Ecology for entry into the Environmental Information Management System (EIM) within 60 days of draft deliverables submittals to Ecology and in accordance with WAC 173-340-840(5) and Ecology's Toxics Cleanup Program Policy 840: Data Submittal Requirements. Only validated data will be entered into the EIM database.

Presented below is a preliminary scope of work for the Work Plan. The scope of work may be revised after completing Subtasks 1a and 1b. The Work Plan may include the following actions.

- **Groundwater**. Groundwater investigations may include installation of additional monitoring wells and performance of additional groundwater monitoring and studies to determine the nature and extent of groundwater contamination and assess the groundwater contaminant transport pathway to Commencement Bay.[2]
    - Additional monitoring wells may be installed as necessary to sufficiently assess groundwater flow direction, presence of free product, and the lateral and vertical extent of groundwater contamination at each confirmed contaminated area.
    - Additional shoreline monitoring wells may be installed to evaluate groundwater conditions in all areas of the EBC shoreline and assess the groundwater transport pathway to Commencement Bay.

[1] National Functional Guidelines for Organic Superfund Methods Data Review, EPA 540-R-20-005, EPA Office of Superfund Remediation and Technology Innovation, November 2020.
National Functional Guidelines for Inorganic Superfund Methods Data Review, EPA 540-R-20-006, EPA Office of Superfund Remediation and Technology Innovation, November 2020.
National Functional Guidelines for High Resolution Superfund Methods Data Review, EPA-540-R-20-007, EPA Office of Superfund Remediation and Technology Innovation, November 2020.November 2020.
[2] Including the Blair and Hylebos Waterways.

- An expanded tidal monitoring study may be performed, after additional monitoring wells are installed, to evaluate the influence on shoreline groundwater conditions, identify appropriate times for groundwater monitoring, and provide information to support evaluation of the groundwater transport pathway to Commencement Bay.

- Groundwater may need to be monitored over time to characterize groundwater conditions, considering seasonal and tidal differences.

- The presence of shoreline seeps may be evaluated and monitored over time if appropriate.

- **Soil and soil gas**. Soil and soil gas investigations may be performed to determine nature and extent of soil and soil gas contamination, and to fill data gaps.

- **Blair Shoreline**. Supplemental characterization of waste materials on the Blair Shoreline, which appear to be slag of various types and cement-like material incorporated with waste shall be performed. RI work to date is not sufficient to evaluate the nature and extent of waste materials and associated contamination or cleanup action alternatives. Supplemental characterization will be guided by consideration of likely cleanup action components along the Blair Shoreline (e.g., containment vs. removal). Leaching tests will be considered if appropriate.[3]

- **Vapor Intrusion**. Vapor intrusion (VI) assessment will be conducted where volatile chemicals in the subsurface pose a potential threat to indoor air quality, including historical underground storage tank (UST) locations as appropriate. Assessment will follow the approach outlined in Ecology's *Guidance for Evaluating Vapor Intrusion in Washington State.*[4] Sufficient data should be collected to evaluate the protectiveness of potential remedial actions for vapor intrusion.

[3] If leaching tests are proposed, the Port and Ecology shall discuss the purpose, goals, and details of the proposed leaching tests before the approach is included in the draft Work Plan. Additional leaching tests shall be appropriate for the waste materials and their location and be consistent with MTCA requirements including WAC 173-340-747 (7).

[4] Updated March 2022.

Vapor intrusion assessments to date have been conducted by Occidental Chemical Corporation (OCC), as required to define the nature and extent of OCC impacts at the Site. VI assessment was not included in the scope of the prior EBC RI work. OCC VI assessment work identified hazardous substances in soil gas, subslab vapor, and indoor air in some EBC buildings.

- **Storm Sewers.** Storm sewer assessments may be performed to evaluate potential release of hazardous substances to Commencement Bay through the storm sewer contaminant transport pathway. Assessment will be focused in areas of confirmed groundwater contamination.

The Port will provide Ecology with an Agency Review Draft Supplemental Remedial Investigation Work Plan (including the SAP and QAPP). After Ecology's comments have been incorporated into the Agency Review Draft Supplemental Remedial Investigation Work Plan, the Port will submit the Supplemental Remedial Investigation Work Plan. Once Ecology reviews and approves the Work Plan, it will be the Final Work Plan. The Work Plan shall not be implemented until approved by Ecology. Once approved by Ecology, the Port will implement the Final Work Plan according to the schedule contained in this Exhibit. The Port shall provide seven (7) days' notice to Ecology before beginning sampling. Ecology may obtain split samples.

TASK 2: SUPPLEMENTAL REMEDIAL INVESTIGATION AND REMEDIAL INVESTIGATION REPORT

The Port shall conduct a supplemental RI that meets the requirements of WAC 173-340-350(7) and WAC 173-204-550 and the Supplemental Remedial Investigation Work Plan as approved by Ecology. The RI will determine the nature and extent of contamination exceeding preliminary Model Toxics Control Act (MTCA) cleanup levels, preliminary Sediment Management Standards (SMS) cleanup standards, and other regulatory requirements. The RI must provide sufficient data and information to define the nature and extent of contamination.

Field sampling and analysis will be completed in general accordance with the SAP and QAPP. Deviation(s) from the approved SAP and QAPP must be communicated to Ecology immediately and documented as required by Ecology.

The Port shall provide interim data reports and updates to Ecology as new site data and information become available. Laboratory analysis data shall also be provided in electronic format when it has been validated. Raw laboratory data will be provided to Ecology upon request.

Before submittal of the Agency Review Draft RI Report, an RI pre-report check-in meeting will be held. During the meeting, Ecology and the Port will review available data and an updated conceptual site model and discuss the content and organization of the Agency Review Draft RI Report.

Upon completion of RI work, the Port shall compile the results of the supplemental remedial investigation and usable historical data into an Agency Review Draft Remedial Investigation Report that meets the requirements of WAC 173-340-350(7) and 173-204-550 for Ecology review and comment. The purpose of the RI Report is to present RI results in sufficient detail to support remedy selection in the Feasibility Study. The RI report will include an updated CSM.

The Port and Ecology shall meet, as needed, to discuss new and existing data, revisions to the CSM, and organization of the RI Report as well as consideration of cleanup action components based on RI results in anticipation of the FS.

The Port shall compile the results of the remedial investigations into an Agency Review Draft RI Report. The Port shall submit the Agency Review Draft RI Report to Ecology for review and comment.

After incorporating Ecology's comments on the Agency Review Draft RI Report, the Port shall submit the Public Review Draft RI Report to Ecology for distribution and public comment. Electronic survey data for monitoring locations, electronic lab data, and GIS maps of contaminant distribution shall also be provided for both the Agency Review Draft RI Report and Public Review Draft RI Reports either in the report or as attachments. The RI Report will not be considered Final until after a public review and comment period.

If data collected during this investigation is insufficient to determine the nature and extent of contamination or to select a cleanup action, additional phase(s) of investigation shall be conducted to obtain sufficient data to define the nature and extent of contamination and select a cleanup action.

TASK 3: FEASIBILITY STUDY

The Port shall use the information presented in the RI to prepare an Agency Review Draft Feasibility Study (FS) that meets the applicable requirements of WAC 173-340-350(8). The FS will evaluate remedial alternatives for site cleanup, consistent with MTCA and SMS requirements to ensure protection of human health and the environment by eliminating, reducing, or otherwise controlling risk posed through each exposure pathway and migration route.

Before beginning the FS, a Feasibility Study Planning Meeting will be held to review ARARs, potential remedial alternatives, and discuss points of compliance. The Agency Review Draft Feasibility Study must include a detailed analysis of each remedial alternative according to the applicable requirements of WAC 173-340-350 and WAC 173-204-550. The remedial alternatives will be evaluated for compliance with the applicable requirements of WAC 173-340-360 and WAC 173-204-570.

The remedial alternative judged to best satisfy the evaluation criteria will be identified. Justification for the selection will be provided, and the recommended remedial alternative further developed, in the FS.

The Port shall submit the Agency Review Draft Feasibility Study to Ecology for review. After addressing Ecology's comments on the Agency Review Draft Feasibility Study, the Port shall submit the Public Review Draft Feasibility Study Report to Ecology for distribution and public comment. The FS will not be considered Final until after a public review and comment period.

TASK 4: PRELIMINARY DRAFT CLEANUP ACTION PLAN

Upon Ecology approval of the Public Review Draft Feasibility Study Report, a Cleanup Action Plan Meeting will be held. The Cleanup Action Plan Meeting will be used to review plans for developing the Agency Review Preliminary Draft Cleanup Action Plan (dCAP).

The Port shall prepare an Agency Review Preliminary dCAP in accordance with WAC 173-340-380 that provides the proposed remedial action to address the contamination present on the Site. The preliminary dCAP shall include a general description of the proposed remedial actions, cleanup standards developed from the RI/FS and rationale regarding their selection, a schedule for implementation, description of any institutional controls proposed, and a summary of applicable local, state, and federal laws pertinent to the proposed cleanup actions.

The Port will submit an Agency Review Preliminary dCAP for Ecology's review and approval. The Agency Review Preliminary dCAP will include, but not be limited to, the information listed under WAC 173-340-380. If contaminated sediments are included in the cleanup action, the cleanup action plan also shall comply with WAC 173-204-580.

After receiving Ecology's comments on the Agency Review Preliminary dCAP, if any, the Port shall revise the Agency Review Preliminary dCAP to address Ecology's comments and submit the plan to Ecology.

TASK 5: SEPA SUPPORT

The Port shall assist Ecology, as requested, to comply with State Environmental Policy Act (SEPA) Rules, such as by preparing a draft SEPA environmental checklist. The Port shall assist Ecology, as requested, with coordinating SEPA public involvement requirements with MTCA public involvement requirements whenever possible, such that public comment periods and meetings or hearings can be held concurrently.

SCHEDULE OF DELIVERABLES

The schedule of deliverables described in Agreed Order Amendment 1 and the Scope of Work is presented below. If the date for submission of any item or notification required by this Schedule of Deliverables occurs on a weekend, state or federal holiday, the date for submission of that item or notification is extended to the next business day following the weekend or holiday. Where a deliverable due date is triggered by Ecology notification, comments, or approval, the starting date for the period shown is the date the Port received such notification, comments, or approval by certified mail, return receipt requested, unless otherwise noted below. Where triggered by Ecology receipt of a deliverable, the starting date for the period shown is the date Ecology receives the deliverable by certified mail, return receipt requested, or the date of Ecology signature on a hand-delivery form. For each version of each deliverable identified in this schedule of work, the Port shall submit to Ecology one (1) hard copy, plus one electronic copy each in Word (.docx) and Adobe (.pdf) formats. Up to five (5) additional hard copies of deliverables may be required for public comment periods and document repositories. Completion times listed below are calendar days. Any deadline that falls on a holiday or weekend shall be extended to the next business day. Ecology shall endeavor to provide comments within 60 days of receipt of a formal deliverable for review. If unanticipated conditions or changed circumstances are discovered that could result in a schedule delay, the Port will notify Ecology. Ecology will determine if a schedule extension is warranted in accordance with the provisions of the Agreed Order, Section VIII.K. (Extension of Schedule).

Ecology may combine, at its discretion, public notice periods for those deliverables for which public notice is required per WAC 173-340-600. Documents subject to public notice will not be final until after public notice and Ecology's final comments have been incorporated.

Schedule of Deliverables Tacoma Port Earley Business Center		
Task	**Deliverable**	**Schedule**
1	Draft Supplemental Remedial Investigation Work Plan including the Historical Data Usability Technical Memorandum and Conceptual Site Model	180 calendar days following the effective date of this Amendment 1 to Agreed Order DE 9553
	Final Supplemental Remedial Work Plan	45 calendar days following receipt of Ecology's final comments on the Draft Supplemental Investigation Work Plan including historical data usability technical memorandum and CSM
2	Completion of Supplemental Remedial Investigation Field Work	12 months following Ecology approval of the Final Supplemental Remedial Investigation Work Plan, Data Usability Memorandum, and CSM Report
	Agency Review Draft Remedial Investigation Report	90 calendar days following receipt of all laboratory data
	Public Review Draft Remedial Investigation Report	45 calendar days following receipt of Ecology's final comments on the Agency Review Draft Remedial Investigation Report
	Final Remedial Investigation Report	30 calendar days following receipt of Ecology's final comments on the Public Review Draft Remedial Investigation Report. Ecology's final comments will consider public comments and will be provided after the public notice period
3	Agency Review Draft Feasibility Study Report	90 days following completion of Public Review Draft Remedial Investigation Report
	Public Review Draft Feasibility Study Report.	45 calendar days following receipt of Ecology's final comments on the Agency Review Draft Feasibility Study Report
	Final Feasibility Study Report	30 calendar days following receipt of Ecology's final comments on the Public Review Draft Feasibility Study Report. Ecology's final comments will consider public comments and will be provided after the public notice period
4	Agency Review Preliminary Draft Cleanup Action Plan (dCAP)	90 calendar days following completion of the Public Review Draft Feasibility Study Report