

FSN 172
CSID 129
HQSTATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

In the Matter of Remedial Action by:)
)
UNITED STATES NAVY) Enforcement Order
)
Jackson Park Housing Complex) No. DE 92TC-005
Kitsap County, Washington)

To: Commander, Puget Sound Naval Shipyard
Bremerton, Washington 98314-5000

I.

Jurisdiction

This Order is issued by the Washington State Department of Ecology under the authority of RCW 70.105D.050(1).

II.

Statement of Facts

2.1 The Jackson Park Housing Complex (JPHC) is a facility that is located in Kitsap County, at Ostrich Bay, near Bremerton, Washington. The facility is located between Ostrich Bay to the east and Austin Drive to the west. It is roughly one-half mile in width east to west and one mile in length north to south. The JPHC site includes all potentially contaminated areas within the current and previous property boundaries of the JPHC, Naval Ammunition Depot Puget Sound/Bremerton Annex, Naval Ammunition Depot Puget Sound, and Naval Magazine Puget Sound; and any areas outside of these property boundaries contaminated by the migration of hazardous substances originating from within these property boundaries. Known areas of concern within the facility are Site 101, Site 101A, Site 103, Site 110 and Site 115 (offshore areas). Hazardous substance releases at the Site may pose a threat to human health and the

environment and requires remedial action. Individual sites within the facility are described below and are outlined in Exhibit A.

2.2 Site 101 encompasses the Ostrich Bay shoreline areas of the JPHC south of Elwood Point. It is the location of former ordnance production and demilitarization activities, and wastewater discharges. Discharges are reported to have included untreated demilitarization wastewater, as well as sanitary, cleanup, and stormwater flows. The discharges occurred from approximately 1908 to 1959. The predominant ordnance compounds handled include Explosive D (Picric acid), TNT, Amatol (TNT and ammonium nitrate), Composition B (TNT, RDX, and plastics), Teteryl, black powder (charcoal, nitrate, and sulfur), and smokeless powder (nitrocellulose, nitroglycerin, and nitroguanidine).

2.3 Site 101A is located in the vicinity of Root Court road, upland of the former oil pier, within the area designated as Site 101. Contamination at Site 101A is primarily associated with underground storage tanks, but may also include contaminants found at other sites at the JPHC.

2.4 Site 103 consists of former fill and trash/ordnance burning areas located along the shoreline from Elwood Point northward, and includes the Naval Hospital and immediate upland areas. Ash and debris remaining from the burning operations are reported to have been used in nearshore filling operations. Hazardous substance residues may have been generated from the burning operations, with subsequent releases into the environment. Site 103 has also been used for the disposal of garbage and ordnance items.

2.5 Site 110 consists of the portion of the facility upland of Sites 101 and 103 which may also have been contaminated with ordnance and ordnance production compounds as a result of past site activities. Included in Site 110 are the bunkers and surrounding areas formerly used for small-arms ammunition storage, located immediately south of the current JPHC property boundaries.

2.6 Site 115 consists of the marine waters, sediments, and biota which have received hazardous substances as a result of past site activities at the JPHC.

2.7 The Navy is the owner and operator of the Jackson Park Housing Complex and is a "Potentially Liable Person" for remedial actions which are required at the Site.

2.8 The foregoing information is contained in the following documents:

- o Heath, J.C., et al. 1983. Navy Assessment and Control of Installation Pollutants: Initial Assessment Study at Naval Submarine Base Bangor, Bremerton, Washington.
- o Hart Crowser, Inc. 1988. Draft Current Situation Report - Sites 101 and 103, Jackson Park Complex, Bremerton, Washington.
- o URS Consultants, Inc. 1991. Draft Work Plans - Jackson Park Housing Complex, Bremerton, Washington, (Sites 101, 103, 110, and 115 (offshore areas)).
- o URS Consultants, Inc. 1991. Draft Project Plans, Site 101A Remedial Investigation/Feasibility Study Supplement, Puget Sound Naval Shipyard, Jackson Park Housing Complex, Bremerton, Washington.
- o Conlow, Judy. 23 December 1991. Letter from the Navy to Mike Bowlus, Army Corps of Engineers, regarding the Small-Arms Ammunition Bunker Area.

III.

Ecology Determinations

3.1 The Navy is an "owner and operator" as defined at RCW 70.105D.020(6) of a "facility" as defined in RCW 70.105D.020(3).

3.2 The facility is known as the Jackson Park Housing Complex and is located east of Austin Drive, and north and east of State Highway 3, at Ostrich Bay near Bremerton, Washington.

3.3 Substances found at the facility are "hazardous substances" as defined at RCW 70.105D.020(5).

3.4 Based on the presence of these hazardous substances at the facility and all factors known to Ecology, there is a release or threatened release of hazardous substances from the facility, as defined at RCW 70.105D.020(10).

3.5 By letter dated July 30, 1991, Ecology notified the Navy of its status as a "Potentially Liable Person" under RCW 70.105D.040, after notice and opportunity for comment.

3.6 Under RCW 70.105D.030(1) and 70.105D.050, Ecology may require potentially liable persons to investigate or conduct other remedial actions with respect to the release or threatened release of hazardous substances, whenever it believes such action to be in the public interest.

3.7 Based on the foregoing facts, Ecology believes the remedial action required by this Order is in the public interest.

IV.

Work to be Performed

4.1 Based on the foregoing Facts and Determinations, it is hereby ordered that the Navy take the following remedial actions and that these actions be conducted in accordance with Chapter 173-340 WAC and Chapter 173-204 WAC unless otherwise specifically provided for herein.

4.2 The Navy shall conduct a Remedial Investigation (RI) and Feasibility Study (FS) of the facility, which shall include Site 101, Site 101A, Site 103, and Site 115 (offshore areas). The Navy shall also conduct a Site Inspection (SI) of Site 110 sufficient to support preparation by Ecology of a state Site Hazard Assessment (WAC 173-340-320). If results of the SI indicate a need for additional investigation of Site 110, the investigation shall be incorporated within the RI/FS, unless an alternative process and schedule is approved by Ecology.

4.3 The Navy shall prepare and transmit to Ecology the deliverables listed below and in Exhibit B. Exhibits are incorporated by reference and are integral and enforceable parts of this Order. Notifications shall be in writing unless otherwise specified. Seven (7) copies of each draft deliverable and nine (9) copies of each final deliverable shall be submitted to Ecology. In addition, selected deliverables are also required on computer diskette(s) as specified in Exhibit B. The Navy shall consult with Ecology regarding the compatibility of computer hardware and software. The Navy shall provide data in a compatible format in order to maximize the sharing of data.

WORK PLANS

4.4 The Navy shall conduct remedial actions according to Ecology approved work plans and procedures. Required work plans and procedures which have been identified to date are listed below and in Exhibit B. As of the signature date of this Order, they have not been approved by Ecology.

- o URS Consultants, Inc. Work Plans - Jackson Park Housing Complex, Bremerton, Washington, (Sites 101, 103, and 115 (offshore areas)). [Includes: Work Plan, Field Sampling Plan, Quality Assurance Project Plan, Site Health and Safety Plan].
- o URS Consultants, Inc. Project Plans, Site 101A Remedial Investigation/Feasibility Study Supplement, Puget Sound Naval Shipyard, Jackson Park Housing Complex, Bremerton, Washington. [Includes: Work Plan, Field Sampling Plan, Quality Assurance Project Plan, Site Health and Safety Plan].
- o Community Relations Plan, Remedial Investigation/Feasibility Study, Jackson Park Housing Complex, Bremerton, Washington.
- o URS Consultants, Inc. Site 110 - Upland Areas Site Inspection Project Plans. [Includes: Work Plan, Field Sampling Plan, Quality Assurance Project Plan, Site Health and Safety Plan].

- o URS Consultants, Inc. Technical Data Management Plan.
- o URS Consultants, Inc. Technical Standard Operating Procedures.

4.5 The above documents must adequately address review comments that Ecology has provided to the Navy. Draft and draft final copies of these documents shall be submitted to Ecology as specified in Exhibit B and according to the procedures for review, comment, and approval required under Section 4.8 of this Order.

4.6 Work plans and schedules must be approved by Ecology in writing (except for Health and Safety Plans) prior to initiation of additional work, unless otherwise approved by Ecology in writing following issuance of this Order. It is Ecology's policy to review and comment on Health and Safety Plans, but not to approve Health and Safety Plans. Work plans shall include schedules and information sufficient to indicate the level of effort and to justify the schedules; for example, supporting information would include assumptions regarding: laboratory analysis time, personnel hours required per task, technical implementation requirements, review time, and availability of key personnel.

4.7 The Navy shall implement the work described in the final work plans in accordance with the work plan schedules. Ecology may require or approve technical, procedural, and design modifications to the work to be performed without formal amendment of this Order. All modifications shall be documented by the Navy in writing.

4.8 The procedures for review, comment and approval of the documents required under this Order are as follows:

- A. The Navy shall initially submit each document to Ecology as a "draft document" for review and comment.
- B. Ecology will provide the Navy with comments within thirty (30) calendar days. Ecology may extend the thirty (30) calendar day period by providing oral or

written notification to the Navy, prior to expiration of the initial thirty (30) calendar day period. Ecology will provide an estimate of the time required for completion of its review.

- C. Unless otherwise specified, following receipt of Ecology's comments on a draft document, the Navy shall have thirty (30) calendar days to respond to comments and submit a "draft final" document to Ecology for approval. This time period may be extended upon Ecology's determination that good cause exists if written notification detailing the circumstances and duration of delay is provided to Ecology prior to expiration of the initial thirty (30) calendar day period.
- D. Within thirty (30) calendar days after receipt of a draft final document, Ecology will notify the Navy in writing of Ecology's approval or disapproval of the document. Ecology may extend the thirty (30) calendar day period by providing oral or written notification to the Navy, prior to expiration of the initial thirty (30) calendar day period. Ecology will provide an estimate of the time required for completion of its review.
- E. If the draft final document is disapproved, Ecology will, at its discretion, either require the Navy to revise and resubmit the document within a specified period of time for approval, or Ecology will revise and approve the document.
- F. With the exception of the RI/FS report, documents required under this Order become "final" upon Ecology approval of a draft final document. The draft final RI/FS report is subject to the public notice and participation requirements of WAC 173-340-600 before it can become final. Once documents are final, the terms and schedules therein become integral and enforceable parts of this Order.

4.9 In the event of any inconsistency between this Order and the work plans developed under this Order, this Order shall govern.

REPORTS

4.10 The Navy shall submit issue-specific technical memorandums within thirty (30) days after receipt of a written request by Ecology. In recognition of the particular constraints of individual issues, this time frame will be extended when adequate justification for so doing is provided by the Navy.

4.11 The RI/FS report shall address the sites described in Section II of this Order in a comprehensive fashion. The Navy shall generate information adequate to develop a Cleanup Action Plan (CAP) for the facility.

SCHEDULE

4.12 The Navy shall provide to Ecology a draft schedule and a draft final schedule which includes all key tasks to accomplish submittal of the deliverables specified in this Order. The schedule shall specify completion dates for each task and indicate dependencies between and among tasks. Requirements for Ecology review and approval shall be identified and clearly shown on the schedule. Any schedule revision request shall include a description of the proposed revision as compared to the current schedule and shall detail known and anticipated impacts to the investigation. The schedule required under this section encompasses all deliverable requirements of this Order and is in addition to schedules required in work plans under Section 4.6.

SAMPLING

4.13 The Navy shall allow split or replicate samples to be taken by Ecology and shall provide Ecology written notification fifteen (15) working days before any sampling activity, except during an emergency. If an emergency exists, prompt oral notification shall be given of the emergency and of the Navy's intent to collect samples. A written summary of actions taken during the emergency shall be provided to Ecology within ten (10) working days.

LAB/FIELD DATA SUBMITTAL

4.14 All validated laboratory results shall be provided to Ecology in print and on computer diskette(s) within forty-five (45) calendar days after initial receipt by the Navy, its consultant,

contractor, or subcontractor of non-validated analytical results from the laboratory. The Navy may extend the forty-five (45) calendar day period for an additional twenty (20) calendar days by providing written notification to Ecology, prior to expiration of the initial forty-five (45) calendar day period. If preliminary analysis indicates a potential imminent and substantial endangerment to the public health, the Ecology project coordinator shall be notified immediately. Analytical backup documentation shall be provided to Ecology within ten (10) working days after receipt of Ecology's written request.

4.15 If validated data is not provided to Ecology within sixty-five (65) calendar days after initial receipt by the Navy, its consultant, contractor, or subcontractor of non-validated analytical results from the laboratory, a summary of all non-validated positive analytical results shall be made available to Ecology upon request. This summary shall also include a list of the compounds which were analyzed for, but not detected.

4.16 If requested, the Navy shall provide to Ecology in print and on computer diskette(s) validated results of sampling, tests, or other data generated by the Navy with respect to implementation of this Order within forty-five (45) calendar days of sample collection or field testing. If validation of the data is not completed within forty-five (45) calendar days, non-validated data shall be made available to Ecology upon request and validated data shall be submitted as they become available, but in no event later than ninety (90) days after the sampling or testing.

4.17 The Navy shall provide to Ecology within five (5) working days after receipt of Ecology's written request a copy of all field investigation notes covering the specified task and period of field activity.

GROUNDWATER SAMPLING DATA SUBMITTAL

4.18 In accordance with WAC 173-340-840(5), groundwater sampling data shall be submitted consistent with procedures specified by Ecology for submittal of groundwater sampling data.

PROGRESS REPORTS

4.19 The Navy shall submit to Ecology written monthly progress reports which briefly describe:

- o the actions it has taken during the previous month to implement the requirements of this Order and to otherwise address human health and environmental concerns at the Site;
- o actions scheduled to be taken during the next month;
- o all field and laboratory data packages received or generated by the Navy, its consultant, contractor, or subcontractor during the previous month, including all validated and non-validated data;
- o the status of schedule compliance;
- o deliverables submitted and the dates of submittal;
- o deliverables anticipated for submittal during the next three months and the anticipated dates of submittal;
- o anticipated problems and proposed solutions, including technical, budget, and scheduling implications;
- o problems encountered and proposed solutions, including technical, budget, and scheduling implications;
- o problems resolved and the method of resolution, including technical, budget, and scheduling implications;
- o key staffing changes.

4.20 All progress reports shall cover the interval from the 26th of the preceding month through the 25th of the subject month and shall be submitted by the tenth calendar day of the following month.

DUE DATES

4.21 If the final day of any time period falls on a Saturday, Sunday, or a state or federal legal holiday, the time period shall be extended to the next working day. Any time period scheduled to begin on the occurrence of an act or event shall begin on the day after the act or event. The deliverable due date shall be considered satisfied for documents 15 pages or less in length, if they are received by FAX on the date due, and the "originals" are received within two (2) working days.

V.

Terms and Conditions of Order

5.1 Definitions. Unless otherwise specified, the definitions set forth in Chapter 70.105D RCW and Chapter 173-340 WAC shall control the meanings of the terms used in this Order.

5.2 Public Notice. RCW 70.105D.030(2)(a) requires that, at a minimum, this Order be subject to concurrent public notice. Ecology shall be responsible for providing such public notice and reserves the right to modify or withdraw any provisions of this Order should public comment disclose facts or considerations which indicate to Ecology that this Order is inadequate or improper in any respect.

5.3 Remedial Action Costs. The Navy shall pay to Ecology costs incurred by Ecology for JPHC site work prior to and under this Order. These costs shall include work performed by Ecology or its contractors for investigations, remedial actions, Order preparation, previous Agreed Order preparation and discussions, oversight, and administration. Ecology costs shall include costs of direct activities; for example, employee salary, laboratory costs, travel costs, contractor fees, and employee benefit packages; and agency indirect costs of direct activities. The Navy shall pay the required amount within ninety (90) calendar days of receiving from Ecology an itemized statement of costs that includes a summary of costs incurred, an identification of involved

staff, and the amount of time spent by involved staff members on the project. A general description of work performed will be provided upon request. Itemized statements will be prepared quarterly. Failure to pay Ecology's costs within ninety (90) calendar days after receipt of an itemized statement of costs may result in interest charges.

5.4 Designated Project Coordinators.

The project coordinator for Ecology is:

Brad Ewy

WOODLAND SQUARE
TOXICS CLEANUP PROGRAM
DEPARTMENT OF ECOLOGY
PO BOX 47600
OLYMPIA WA 98504-7600

(206) 438-3072
FAX (206) 438-3050

Express Mail Address:

Toxics Cleanup Program
Department of Ecology
4415 Woodview Drive S.E.
Lacey, WA 98503

The project coordinator for the Navy is:

Richard Stoll

Naval Facilities Engineering Command
Engineering Field Activity, Northwest
3505 N.W. Anderson Hill Road
P.O. Box 2360
Silverdale, WA 98383-2360

(206) 476-5775
FAX (206) 476-1158

The project coordinators shall be responsible for overseeing the implementation of this Order. To the maximum extent possible, communications between Ecology and the Navy, and all documents, including reports, approvals, and other correspondence concerning the activities performed under the terms and conditions of this Order, shall be directed through the project coordinators. Should Ecology or the Navy change project coordinators, written notification shall be provided to Ecology or the Navy at least ten (10) calendar days prior to the change.

5.5 Performance. All work performed under this Order shall be under the direction and supervision, as necessary, of a professional

engineer or hydrogeologist, or similar expert, with appropriate training, experience and expertise in hazardous waste site investigation and cleanup. The Navy shall notify Ecology in writing as to the identity of such engineer(s) or hydrogeologist(s), and of any other key personnel, consultants, contractors, subcontractors, and agents to be used in carrying out the terms of this Order; including those presently working on the Site, and in advance of those not yet involved.

Except when necessary to abate an emergency situation, the Navy shall not perform any remedial actions at the Site outside that required by this Order unless Ecology concurs, in writing, with such additional remedial actions.

WAC 173-340-400(7)(b)(i) requires that "construction" performed on the Site must be under the supervision of a professional engineer registered in the state of Washington.

5.6 Access. Ecology or any Ecology authorized representative shall have the authority to enter and freely move about on all property at the Site at all reasonable times for the purposes of, among other things: inspecting records, operation logs, and contracts related to the work being performed under this Order; reviewing the progress in carrying out the terms of this Order; conducting such tests or collecting samples as Ecology or its authorized representative may deem necessary; using a camera, sound recording, or other documentary type equipment to record work done under this Order; and verifying the data submitted to Ecology by the Navy. When entering the Site under Chapter 70.105D RCW, this Order shall constitute Ecology's reasonable notice prior to entering the Site at reasonable times, including emergencies. Ecology will allow split or replicate samples to be taken by the Navy during an inspection unless doing so would interfere with Ecology's sampling. The Navy shall allow split or replicate samples to be taken by Ecology and shall provide Ecology written notification fifteen (15) working days before any sampling activity.

5.7 Public Participation. The Navy shall prepare a draft final public participation plan for the Site and update the final public participation plan upon Ecology's written request. Ecology shall maintain the responsibility for public participation at the Site. The Navy shall help coordinate and implement public participation for the Site.

5.8 Retention of Records. The Navy shall preserve in a readily retrievable fashion, during the pendency of this Order and for ten (10) years from the date of completion of the work performed under this Order, all records, reports, documents, and underlying data in its possession relevant to this Order. Should any portion of the work performed hereunder be undertaken through consultants, contractors, subcontractors, or agents of the Navy, a record retention requirement meeting the terms of this paragraph shall be required of such consultants, contractors, subcontractors, and/or agents.

5.9 Dispute Resolution. The Navy may request Ecology to resolve factual or technical disputes which may arise during the implementation of this Order. Such request shall be in writing and directed to the signatory of this Order. Ecology resolution of the dispute shall be binding and final. The Navy is not relieved of any requirement of this Order during the pendency of the dispute and remains responsible for timely compliance with the terms of this Order unless otherwise provided by Ecology in writing.

5.10 Reservation of Rights. Ecology reserves all rights to issue additional orders or take any action authorized by law in the event or upon the discovery of a release or threatened release of hazardous substances not addressed by this Order, upon discovery of any factors not known at the time of issuance of this Order, in order to abate an emergency, or under any other circumstances deemed appropriate by Ecology.

Ecology also reserves all rights regarding the injury to, destruction of, or loss of natural resources resulting from the release or threatened release of hazardous substances from the Site.

In the event Ecology determines that conditions at the Site are creating or have the potential to create a danger to the health or welfare of the people on the Site, in the surrounding area, or to the environment, Ecology may order the Navy to stop further implementation of this Order for such period of time as needed to abate the danger.

5.11 Transference of Property. No voluntary or involuntary conveyance or relinquishment of title, easement, leasehold, or other interest in any portion of the Site shall be consummated by the Navy without provision for continued implementation of all requirements of this Order and implementation of any remedial actions found to be necessary as a result of this Order.

Prior to transfer of any legal or equitable interest the Navy may have in the Site or any portions thereof, the Navy shall serve a copy of this Order upon any prospective purchaser, lessee, transferee, assignee, or other successor in such interest. At least thirty (30) calendar days prior to finalization of any transfer, the Navy shall notify Ecology in writing of the contemplated transfer.

5.12 Compliance With Other Applicable Laws. All actions carried out by the Navy under this Order shall be done in accordance with all applicable federal, state, and local requirements.

VI.

Satisfaction of this Order

The provisions of this Order shall be deemed satisfied upon the Navy's receipt of written notification from Ecology that the Navy has completed the remedial activity required by this Order, as amended by any modifications, and that all other provisions of this Order have been complied with.

VII.

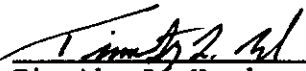
Enforcement

Under RCW 70.105D.050, this Order may be enforced as follows:

- A. The Attorney General may bring an action to enforce this Order in a state or federal court.
- B. The Attorney General may seek, by filing an action, if necessary, to recover amounts spent by Ecology for investigative and remedial actions and orders related to the Site.
- C. In the event the Navy refuses, without sufficient cause, to comply with any term of this Order, the Navy will be liable for:
 - (1) up to three times the amount of any costs incurred by the state of Washington as a result of its refusal to comply; and
 - (2) civil penalties of up to \$25,000 per calendar day for each day it refuses to comply.
- D. This Order is not appealable to the Washington Pollution Control Hearings Board. This Order may be reviewed only as provided under RCW 70.105D.060.

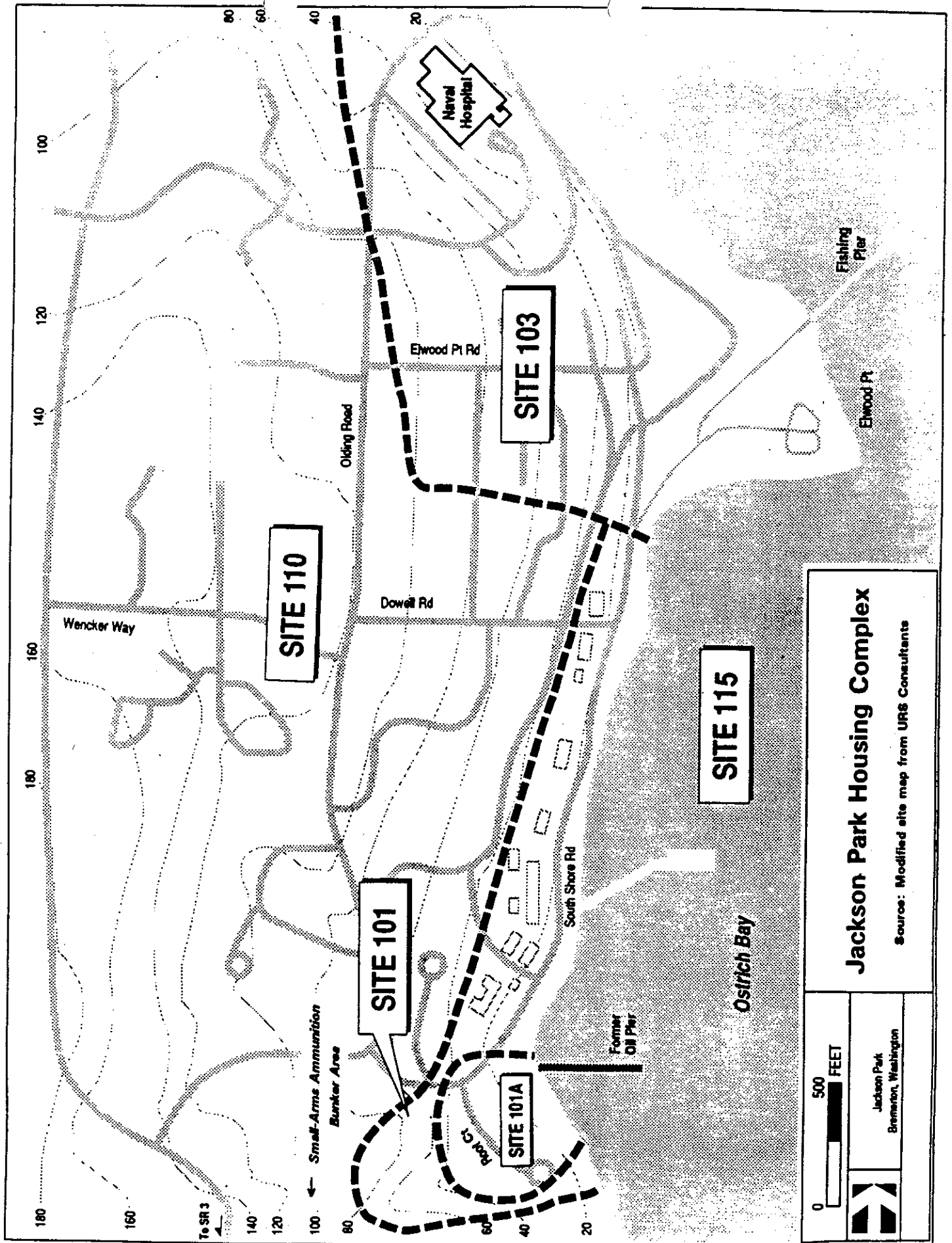
The effective date of this Order is the date of receipt by the Navy.

Dated this 18th day of
February, 1992.



Timothy J. Nord
Section Manager
Site Cleanup Section
Toxics Cleanup Program

EXHIBIT A



Jackson Park Housing Complex

Source: Modified site map from URS Consultants

Jackson Park
Bremerton, Washington



EXHIBIT B
DELIVERABLES/REQUIREMENTS

DELIVERABLE/REQUIREMENT	DATE DUE
1. Draft Final Work Plan - Sites 101, 103, and 115, RI/FS, Jackson Park Housing Complex.	30 calendar days after effective date of Order
2. Draft Final Field Sampling Plan - Sites 101, 103, and 115, RI/FS, Jackson Park Housing Complex.	30 calendar days after effective date of Order
3. Draft Final Quality Assurance Project Plan - Sites 101, 103, and 115, RI/FS, Jackson Park Housing Complex.	30 calendar days after effective date of Order
4. Draft Final Site Health and Safety Plan - Sites 101, 103, and 115, RI/FS, Jackson Park Housing Complex (including one copy of previously referenced SOPs).	30 calendar days after effective date of Order
5. Draft Final Work Plan - Site 101A, RI/FS, Jackson Park Housing Complex.	30 calendar days after effective date of Order
6. Draft Final Field Sampling Plan - Site 101A, RI/FS, Jackson Park Housing Complex.	30 calendar days after effective date of Order
7. Draft Final Quality Assurance Project Plan - Site 101A, RI/FS, Jackson Park Housing Complex.	30 calendar days after effective date of Order
8. Draft Final Site Health and Safety Plan - Site 101A, RI/FS, Jackson Park Housing Complex (including one copy of previously referenced SOPs).	30 calendar days after effective date of Order
9. Draft Project Plans, Upland Area - Site 110, Site Inspection, Jackson Park Housing Complex.	Received
10. Draft Final Work Plan, Upland Area - Site 110, Site Inspection, Jackson Park Housing Complex.	45 calendar days after effective date of Order
11. Draft Final Field Sampling Plan, Upland Area - Site 110, Site Inspection, Jackson Park Housing Complex.	45 calendar days after effective date of Order
12. Draft Final Quality Assurance Project Plan, Upland Area - Site 110, Site Inspection, Jackson Park Housing Complex.	45 calendar days after effective date of Order
13. Draft Final Site Health and Safety Plan, Upland Area - Site 110, Site Inspection, Jackson Park Housing Complex.	45 calendar days after effective date of Order

**EXHIBIT B
(continued)**

DELIVERABLES/REQUIREMENTS

DELIVERABLE/REQUIREMENT	DATE DUE
14. Draft Final Community Relations Plan, RI/FS, Jackson Park Housing Complex.	30 calendar days after effective date of Order
15. Draft Final Technical Data Management Plan, Jackson Park Housing Complex.	30 calendar days after effective date of Order
16. Draft Final Technical Standard Operating Procedures.	30 calendar days after effective date of Order
17. Revisions to Technical Standard Operating Procedures.	15 working days prior to proposed implementation
18. Technical Memorandums - Issue Specific (Note: The time frame can be extended based on adequate justification by the Navy.).	30 calendar days after receipt of Ecology's written request
19. Field Investigation Notes - Task and Activity Period Specific (Section 4.17).	5 working days after receipt of Ecology's written request
20. Notification Before Sampling (Note: prompt oral notification in an emergency, followed by a written summary of actions taken within 10 working days).	15 working days, or concurrent with emergency
21. Validated Laboratory Results (Submitted in Print and on Computer Diskette(s)).	45 calendar days after Navy's receipt of non-validated results from laboratory
22. Summary of Non-validated Laboratory Results Shall be Made Available.	Upon request, if validated results are not provided within 65 calendar days after receipt from laboratory
23. Backup Documentation of Laboratory Results (which have been made available or provided).	10 working days after receipt of Ecology's written request

EXHIBIT B
(continued)

DELIVERABLES/REQUIREMENTS

DELIVERABLE/REQUIREMENT	DATE DUE
24. Draft Project Schedule.	30 calendar days after effective date of Order and concurrent with any schedule revision request
25. Draft Final Project Schedule.	30 calendar days following receipt of Ecology's comments on draft
26. Progress Reports (Section 4.19).	By the 10th of the month
27. Response to Ecology Comments on Draft Documents and Submittal of Draft Final Documents.	30 calendar days following receipt of Ecology's comments on draft
28. Revised Draft Final Documents (if not revised by Ecology).	To be determined by Ecology after review of initial draft final document
29. Draft Work Plans for Additional Investigation Phase or Data Gap (as identified).	60 calendar days after receipt of Ecology's written request
30. Draft Final Work Plans for Additional Investigation Phase or Data Gap (as identified).	30 calendar days after receipt of Ecology comments on draft work plan
31. Draft RI Report.	March 20, 1992
32. Draft Final RI Report.	July 17, 1992
33. Draft FS Report.	August 3, 1992
34. Draft Final FS Report.	December 30, 1992
35. Notification of Change in Project Coordinators.	10 calendar days in advance

EXHIBIT B
(continued)

DELIVERABLES/REQUIREMENTS

DELIVERABLE/REQUIREMENT	DATE DUE
36. Identification of Key Personnel, Consultants, Contractors, Subcontractors, and Agents Working Under this Order.	30 calendar days after effective date of Order if currently involved, or 10 working days in advance of involvement
37. Identification of Computer Software Packages Used to Provide Information on Diskette(s) (Section 4.3).	30 calendar days after effective date of Order
38. Record Retention Requirement.	Shall maintain records for 10 years from date of completion of work performed
39. Notification of Contemplated Property Transfer.	30 calendar days prior to property transfer
40. Payment of Ecology's Costs.	90 calendar days after receipt of statement
41. Ground Water Data Submittal on Diskette(s) (as per procedures specified by Ecology).	10 working days after receipt of Ecology's written request, quarterly thereafter, and concurrent with report submittals
<p>NOTE: Seven (7) copies of each draft deliverable and nine (9) copies of each final deliverable shall be submitted to Ecology. In addition, selected deliverables are also required on computer diskette(s) as specified in this exhibit.</p> <p>The deliverable due date shall be considered satisfied for documents 15 pages or less in length, if they are received by FAX on the date due, and the "originals" are received within two (2) working days.</p> <p>If the final day of any time period falls on a Saturday, Sunday, or a state or federal legal holiday, the time period shall be extended to the next working day. Any time period scheduled to begin on the occurrence of an act or event shall begin on the day after the act or event.</p>	

