



October 16, 2018

Scott Miller
Remedial Project Manager
Superfund Remedial Branch, Section C
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW
Atlanta, GA 30303-8909

VIA EMAIL

Subject: **September 2018 Monthly Progress Report**

Dear Mr. Miller:

On behalf of Beazer East, Inc. (Beazer), attached is the September 2018 Monthly Progress Report for the Koppers portion of the Cabot/Koppers Superfund Site in Gainesville, Florida. If you have any questions or comments, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gregory W. Council'.

Gregory W. Council, P.E.
Principal Engineer

cc: Tracie Vaught, FDEP
Rusty Kestle, USEPA
Robin Hallbourg, ACEPD
Agustin (Gus) Olmos, ACEPD
Kristie Williams, City of Gainesville
Yvette Carter, City of Gainesville
Rick Hutton, GRU
Carrie McCoy, Black & Veatch
John Herbert, GeoHydro Consultants
Patricia Cline, Community Technical Advisor
Linda Paul, Koppers, Inc.
Mitchell Brouman, TRMI
Mike Slenska, TRMI
Donna Kopach, TRMI
Jim Erickson, Tetra Tech
Wayne Reiber, Cabot Corporation
Steve Clark, FTS
John Helton, FTS
Bryan Cotter, Water and Air Research, Community Technical Advisor
Mark Taylor, Weston Solutions

TETRA TECH

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**SEPTEMBER 2018
MONTHLY PROGRESS REPORT
Cabot/Koppers Superfund Site
Gainesville, Florida**

1. Compliance Actions:

- Beazer's Operation and Maintenance (O&M) Contractor performed routine treatment plant O&M services for the groundwater extraction and pretreatment system.
- Remedial Design and Remedial Action activities are presently being conducted.

2. Sampling/Test Results and Data:

- Instantaneous flow rates and totalizer volumes were measured in each extraction well.
- The bi-weekly passive NAPL recovery program continues at Upper Hawthorn monitoring wells and temporary injection points (TIPs) installed as part of the In-Situ Geochemical Stabilization (ISGS) program. Two NAPL recovery events were conducted during the month for the monitoring wells and two were conducted for the TIPs.
- Table 1 provides DNAPL collection data for wells at the Former North Lagoon and Drip Track. The only monitored TIP outside the Former Process Area and Former South Lagoon is at the Drip Track (Table 1). Process Area and South Lagoon recovery data will be included in forthcoming performance monitoring submittals.
- A total of 3,596,366 gallons of groundwater were recovered by the Surficial Aquifer drains and extraction well system (both Surficial Aquifer and UFA) during the past month (system run time of 720 hours). The average recovery rate for the month was approximately 83.2 gallons per minute (gpm). The recovery for each component is listed below.
 - Surficial Aquifer
 - Perimeter Extraction Wells: 495,254 gallons
 - Former North Lagoon Drain: 424,690 gallons
 - Former Drip Track Drain: 441,380 gallons
 - Former Process Area Drain: 434,290 gallons
 - Former South Lagoon Drain: 460,040 gallons
 - Upper Floridan Extraction Wells
 - FW-6: 15,344 gallons
 - FW-21B: 154,337 gallons
 - FW-31BE: 806,290 gallons
 - FW-32BE: 364,741 gallons

Approximately 450.5 million gallons have been recovered from the Surficial Aquifer extraction wells and four drains since the start of the Surficial Aquifer containment system in January 1995.

For the month, the total volume of water treated and discharged to the GRU wastewater system was measured to be 2,442,000 gallons. A portion of the water, from Upper Floridan Aquifer wells, was treated and used for on-Property irrigation.

The Former Process Area groundwater drain pump was turned off for approximately 7 hours to pump and clean clarifiers and to treat backwash water. FW-6 went down on approximately Sept 21 and remained off until the end of the month.

3. Plans, Reports, Deliverables and Procedures Completed:

- Remedial Design/Remedial Action Status Update Meeting (EPA/Beazer) September 18, 2018.
- Periodic maintenance checks and inspections.
- Treatment-plant component maintenance and repair as needed (caustic pump, carbon vessel gaskets and gauges, sludge pump diverter valve, bag filter vessel). Recalibrated treatment probe, replaced feed tank float switch, purged and cleaned chemical lines, repaired sprinkler lines and plant valves.
- General site maintenance included repair of electrical shed and dispatching GRU to repair incoming electrical lines (site wide outage on September 29, 2018).
- Sampled irrigation breakthrough water September 27, 2018.
- Sampled TSE on September 6, 2018.
- Repaired KIFCO reel (part of irrigation system).
- Investigated FW-6 compressor.
- Repaired EW-17 panel wiring.
- Shipped 3 drums DNPAL, 31 drums spent carbon, 23 drums treatment sludge, 10 drums PPE on September 5, 2018.
- On-property irrigation using treated groundwater from FW-21B, FW-31BE, and FW-32BE.

4. Upcoming Actions:

- Fourth quarter sampling event December 17-18, 2018.
- NAPL collection at Upper Hawthorn monitoring wells: bi-weekly.
- NAPL collection at temporary Upper Hawthorn ISGS injection points: bi-weekly.
- Routine inspection, operation, maintenance, and monitoring.

5. Schedule Status:

- Minor modifications were made to the project schedule.

6. Community Involvement:

- Future community involvement activities will be coordinated with EPA.

Table 1. DNAPL recovery volume (gal) at wells and at Drip Track TIP: September 2018

Date	Well	Volume (gal)
9/13/2018	HG-10S	Stain
	HG-10D	Stain
	HG-12S	0.5
	HG-12D	ND
	HG-16S	0.5
	HG-16D	Stain
	MW-22B	Stain
9/27/2018	HG-10S	Stain
	HG-10D	Stain
	HG-12S	0.5
	HG-12D	ND
	HG-16S	Stain
	HG-16D	Stain
	MW-22B	Stain
9/4/2018	Drip Track	0.4
9/18/2018	Drip Track	0.8

GAINESVILLE REMEDIAL DESIGN

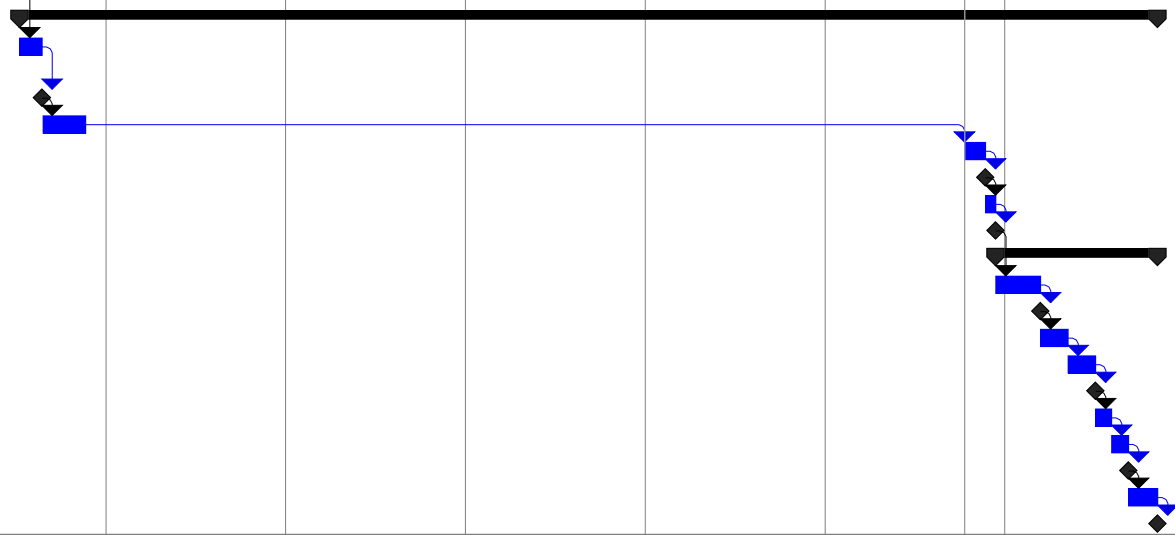
ID	WBS	Task Name	Duration	Predecessors	Start	Finish	2012		2013		2014		2015		2016		2017		2018		2019		2020		2021		H1
							H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	
1		1 Consent Decree for RD/RA	23.8 wks		Thu 2/7/13	Wed 7/24/13																					
2	1.1	US DOJ Lodges Donsent Decree with Court	0 days		Thu 2/7/13	Thu 2/7/13			◆																		
3	1.2	Public Comment on Consent Decree	4.6 wks		Wed 2/13/13	Fri 3/15/13			■																		
4	1.3	Beazer Submittal: Project Coordinators, Supervising Contractor, Quality Management Plan	0 days		Fri 2/15/13	Fri 2/15/13			◆																		
5	1.4	Court Enters Consent Decree Final	0 days		Tue 7/9/13	Tue 7/9/13			◆																		
6	1.5	EPA Issues Authorization to Proceed with Remedial Design	0 days		Wed 7/24/13	Wed 7/24/13			◆																		
7																											
8		2 Remedial Design Work Plan (RDWP)	22.3 wks		Wed 7/24/13	Thu 12/26/13																					
9	2.1	Prepare RDWP	43 days	6	Wed 7/24/13	Fri 9/20/13			■																		
10	2.2	Beazer Submit RDWP	0 wks	9	Fri 9/20/13	Fri 9/20/13			◆																		
11	2.3	EPA Review and Comment RDWP	6.8 wks	10	Mon 9/23/13	Thu 11/7/13			■																		
12	2.4	Beazer Respond to Comments	4.3 wks	11	Fri 11/8/13	Mon 12/9/13			■																		
13	2.5	Beazer Submit Responses and RDWP Version 2	0 wks	12	Mon 12/9/13	Mon 12/9/13			◆																		
14	2.6	EPA Review	2.6 wks	13	Mon 12/9/13	Thu 12/26/13			■																		
15	2.7	EPA Approval RDWP	0 wks	14	Thu 12/26/13	Thu 12/26/13			◆																		
16																											
17		3 Supporting Plans for RD/RA	100.8 wks		Fri 9/20/13	Thu 8/27/15																					
18	3.5	Beazer Submit Health & Safety Plan	0 wks	10	Fri 9/20/13	Fri 9/20/13			◆																		
19	3.2	Materials Management Plan	5 wks	10	Tue 4/1/14	Mon 5/5/14			■																		
20	3.6	Stormwater Management Plan	5 wks	19FF	Tue 4/1/14	Mon 5/5/14			■																		
21	3.7	Noise and Dust Control Plan	5 wks	19FF	Tue 4/1/14	Mon 5/5/14			■																		
22	3.5	Equipment Decontamination Plan	5 wks	19FF	Tue 4/1/14	Mon 5/5/14			■																		
23	3.6	Beazer update QAPP	33.8 wks		Mon 1/5/15	Thu 8/27/15																					
24	3.7	Beazer Submit Revised QAPP	0 wks	23	Thu 8/27/15	Thu 8/27/15																					
25																											
26		4 Off-Property Soil Replacement (OU-5): DESIGN TRACK #1	121.4 wks		Tue 4/30/13	Thu 8/27/15																					
27	4.1	Initial Identification of Remediation & Evaluation Parcels	0 wks		Tue 4/30/13	Tue 4/30/13			◆																		
28	4.2	Obtain Access Agreements for Surveys & Sampling	23 wks		Thu 5/2/13	Wed 10/9/13			■																		
29	4.3	Community Information Session	0 wks		Thu 5/30/13	Thu 5/30/13			◆																		
30		4.4 Sampling for Refinement of Remediation Parcels (July 2013)	18.8 wks		Fri 7/19/13	Wed 11/27/13																					
31	4.4.1	Proposal for Sampling (July 2013)	0 wks		Fri 7/19/13	Fri 7/19/13			◆																		
32	4.4.2	EPA Approval of Sampling	0 wks		Mon 7/22/13	Mon 7/22/13			◆																		
33	4.4.3	Sample Collection	2 days		Tue 7/30/13	Wed 7/31/13			■																		
34	4.4.4	Analysis and Validation	6.2 wks	33	Thu 8/1/13	Thu 9/12/13			■																		
35	4.4.5	Data Summary Report	10.8 wks	34	Fri 9/13/13	Wed 11/27/13			■																		
36	4.4.6	Beazer Submit Data Summary and Fingerprinting Report	0 wks	35	Wed 11/27/13	Wed 11/27/13			◆																		
37		4.5 Pilot Home Soil Replacement	10.3 wks		Thu 9/26/13	Fri 12/6/13																					
38	4.5.1	Survey	1.8 wks		Thu 9/26/13	Tue 10/8/13			■																		
39	4.5.2	Design & Interview	3 wks	38	Wed 10/9/13	Tue 10/29/13			■																		
40	4.5.3	Borrow Sampling	2 wks		Thu 10/10/13	Wed 10/23/13			■																		
41	4.5.4	Sample Analysis	2 wks	40	Thu 10/24/13	Wed 11/6/13			■																		
42	4.5.5	Pilot Plan	6 wks		Thu 9/26/13	Wed 11/6/13			■																		
43	4.5.6	Submit Pilot Plan	0 wks	42,41	Wed 11/6/13	Wed 11/6/13			◆																		
44	4.5.7	Review	1 wk	43	Thu 11/7/13	Wed 11/13/13			■																		
45	4.5.8	EPA Approval of Pilot Plan	0 wks	44	Wed 11/13/13	Wed 11/13/13			◆																		
46	4.5.9	Permitting	2 wks	45FF	Thu 10/31/13	Wed 11/13/13			■																		
47	4.5.10	Pilot Implementation	3.3 wks	46,45	Thu 11/14/13	Fri 12/6/13			■																		
48		4.6 Blocks A-I Remediation Design	42.4 wks		Mon 9/16/13	Tue 7/8/14																					
49	4.6.1	Remedial Design Details	12.4 wks	35	Thu 11/28/13	Fri 2/21/14			■																		
50	4.6.2	Submit RD Details	0 wks	49	Fri 2/21/14	Fri 2/21/14			◆																		
51	4.6.3	Review and Comment	0.8 wks	50	Mon 2/24/14	Thu 2/27/14			■																		
52	4.6.4	Surveying & Interviews	34 wks		Mon 9/16/13	Fri 5/9/14			■																		
53	4.6.5	Parcel Designs & Remediation Agreements	28 wks		Mon 12/2/13	Fri 6/13/14			■																		
54		4.6.6 Final Design and RAWP	19.6 wks		Fri 2/21/14	Tue 7/8/14																					
55	4.6.6.1	Submit Pre-Final Designs & RAWP: Blocks G & H	0 wks		Fri 2/21/14	Fri 2/21/14			◆																		
56	4.6.6.2	Final Design and RAWP Approval: Blocks G-H	1 wk	55	Fri 2/21/14	Thu 2/27/14			■																		
57	4.6.6.3	Submit Pre-Final Designs & RAWP: Blocks E&F	0 wks		Fri 3/7/14	Fri 3/7/14			◆																		
58	4.6.6.4	Final Design and RAWP Approval: Blocks E&F	1 day	57	Fri 3/7/14	Fri 3/7/14			◆																		
59	4.6.6.5	Submit Pre-Final Designs & RAWP: Block D	0 wks		Thu 4/3/14	Thu 4/3/14			◆																		
60	4.6.6.6	Final Design and RAWP Approval: Block D	2 days	59	Thu 4/3/14	Fri 4/4/14			■																		
61	4.6.6.7	Submit Pre-Final Designs & RAWP: Block C	0 wks	59FF+4 wks	Wed 4/30/14	Wed 4/30/14			◆																		
62	4.6.6.8	Final Design and RAWP Approval: Block C	0 wks	61	Wed 4/30/14	Wed 4/30/14			◆																		

GAINESVILLE REMEDIAL DESIGN

ID	WBS	Task Name	Duration	Predecessors	Start	Finish	2012		2013		2014		2015		2016		2017		2018		2019		2020		2021		H1
							H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2		
125	6.1.6	Review and Approval of Pilot Test Plan	10 wks	124	Wed 12/11/13	Tue 2/18/14																					
126	6.1.7	Technical Working Group Meeting	0 wks		Wed 12/18/13	Wed 12/18/13																					
127	6.1.8	Pilot Injection Testing	15 wks	125	Mon 3/17/14	Fri 6/27/14																					
128	3.1.8.1	Pre-Pilot Testing & Chemical Delivery	1 wk		Mon 3/17/14	Fri 3/21/14																					
129	3.1.8.2	Pilot Injections	3 wks	128	Mon 3/24/14	Fri 4/11/14																					
130	3.1.8.3	Borings in Injection Area	1 wk	129FS+10 wk	Mon 6/23/14	Fri 6/27/14																					
131	6.1.9	Technical Working Group Meeting	0 wks		Thu 7/10/14	Thu 7/10/14																					
132	6.1.10	Pre-Final Design	44 wks	129	Mon 4/14/14	Fri 2/13/15																					
133	6.1.11	Submit Pre-Final Design	0 wks	132	Fri 2/13/15	Fri 2/13/15																					
134	6.1.12	Review and Comment	6 wks	133	Mon 2/16/15	Fri 3/27/15																					
135	6.1.13	Final Design and RAWP	3.2 wks	134	Mon 3/30/15	Mon 4/20/15																					
136	6.1.14	Submit Final Design and RAWP	0 wks	135	Mon 4/20/15	Mon 4/20/15																					
137	6.1.15	Review	0.4 wks	136	Tue 4/21/15	Wed 4/22/15																					
138	6.1.16	EPA Approval of Final Design and RAWP	0 wks	137	Wed 4/22/15	Wed 4/22/15																					
139	6.1.17	Implementation of Process-Area ISGS Injections	12 wks	138FS+7 wks	Tue 7/7/15	Mon 9/28/15																					
140	6.1.18	Prepare Implementation Report	157 wks	139	Tue 9/29/15	Fri 9/28/18																					
141	6.1.19	Submit Implementation Report	0 wks	140	Fri 9/28/18	Fri 9/28/18																					
142	6.1.20	Post-Injection Effectiveness Monitoring	52 wks	141	Mon 10/1/18	Fri 9/27/19																					
143	6.1.21	Submit Phase II Performance Monitoring Report	0 wks		Mon 8/1/16	Mon 8/1/16																					
144	6.1.22	Review	20.4 wks	143	Mon 8/1/16	Tue 12/20/16																					
145	6.1.23	Submit Revised Phase II Performance Monitoring Report	0 wks	144	Tue 12/20/16	Tue 12/20/16																					
146	6.1.24	Review	7.6 wks	145	Wed 12/21/16	Fri 2/10/17																					
147	6.1.25	EPA Approval of Phase II Monitoring Report and Additional Treatment	0 wks	146	Fri 2/10/17	Fri 2/10/17																					
148	6.1.26	Follow-Up ISGS Injections	4 wks	147	Mon 2/13/17	Fri 3/10/17																					
149	6.1.27	Plan for Confirmation Borings	0 wks		Fri 8/18/17	Fri 8/18/17																					
150	6.1.28	Review and Comment	2.8 wks	149	Fri 8/18/17	Wed 9/6/17																					
151	6.1.29	Updated Plan for Confirmation Borings	0 wks	150	Wed 9/6/17	Wed 9/6/17																					
152	6.1.30	Conduct Follow-Up Borings/Testing	11 wks	151	Thu 9/7/17	Wed 11/22/17																					
153	6.1.31	Prepare Evaluation Report	5.2 wks	152	Thu 11/23/17	Thu 12/28/17																					
154	6.1.32	Submit Evaluation Report	0 wks	153	Thu 12/28/17	Thu 12/28/17																					
155																											
156	6.2	South Lagoon	224.4 wks		Mon 9/8/14	Mon 12/24/18																					
157	6.2.1	Preliminary Design & Design Investigation Work Plan	32.2 wks		Mon 9/8/14	Mon 4/20/15																					
158	6.2.2	Submit Preliminary Design & Design Investigation Work Plan	0 wks	157	Mon 4/20/15	Mon 4/20/15																					
159	6.2.3	Review of Preliminary Design & Design Investigation Work Plan	45 wks	158	Tue 4/21/15	Mon 2/29/16																					
160	6.2.4	Prepare Revised Preliminary Design & Design Investigation Work Plan	3.1 wks	159	Tue 3/1/16	Tue 3/22/16																					
161	6.2.5	Review and Approval of Work Plan	24.6 wks	160	Tue 3/22/16	Fri 9/9/16																					
162	6.2.6	Installation of Borings and DNAPL Recovery Wells	15.4 wks	161	Thu 4/13/17	Fri 7/28/17																					
163	3.2.6.1	Phase I Results and Plan for Additional Borings	0 wks		Thu 4/13/17	Thu 4/13/17																					
164	3.2.6.2	Review and Comment	4.8 wks	163	Thu 4/13/17	Tue 5/16/17																					
165	3.2.6.3	Revised Plan for Additional Borings	1.6 wks	164	Wed 5/17/17	Fri 5/26/17																					
166	3.2.6.4	Review and Approval	3.4 wks	165	Mon 5/29/17	Tue 6/20/17																					
167	3.2.6.5	Installation of Additional Borings	5.6 wks	166	Wed 6/21/17	Fri 7/28/17																					
168	6.2.7	Collection of Baseline Data	23 wks	162	Mon 7/31/17	Thu 1/4/18																					
169	6.2.8	Pre-Final Design	11.6 wks	162	Mon 7/31/17	Wed 10/18/17																					
170	6.2.9	Submit Pre-Final Design	0 wks	169	Wed 10/18/17	Wed 10/18/17																					
171	6.2.10	Review and Comment	13.4 wks	170	Thu 10/19/17	Thu 1/18/18																					
172	6.2.11	Final Design and RAWP	5.4 wks	171	Fri 1/19/18	Mon 2/26/18																					
173	6.2.12	Submit Final Design and RAWP	0 wks	172	Mon 2/26/18	Mon 2/26/18																					
174	6.2.13	Review	1.8 wks	173	Tue 2/27/18	Fri 3/9/18																					
175	6.2.14	EPA Approval of Final Design and RAWP	0 wks	174	Fri 3/9/18	Fri 3/9/18																					
176	6.2.15	Prepare for ISGS Injections	7 wks	175	Mon 3/12/18	Fri 4/27/18																					
177	6.2.16	Implementation of South Lagoon ISGS Injections	9.2 wks	176	Mon 4/30/18	Mon 7/2/18																					
178	6.2.17	Prepare Implementation Report	25 wks	139,177	Tue 7/3/18	Mon 12/24/18																					
179	6.2.18	Submit Implementation Report	0 wks	178	Mon 12/24/18	Mon 12/24/18																					
180																											
181	7	In-Situ Solidification/Stabilization (ISS/S): DESIGN TRACK #4	130 wks		Fri 10/12/18	Thu 4/8/21																					
182	7.1	Pre-Design Investigation Workplan	8 wks	15	Fri 10/12/18	Thu 12/6/18																					
183	7.2	Beazer Submit Pre-Design Investigation WP	0 wks	182	Thu 12/6/18	Thu 12/6/18																					

GAINESVILLE REMEDIAL DESIGN

ID	WBS	Task Name	Duration	Predecessors	Start	Finish	2012		2013		2014		2015		2016		2017		2018		2019		2020		2021		H1	
							H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2	H1	H2		
184	7.3	Review and Approval	2 wks	183	Fri 12/7/18	Thu 12/20/18																						
185	7.4	Conduct Pre-Design Investigation	11 wks	184	Fri 12/21/18	Thu 3/7/19																						
186	7.5	Pilot Test Workplan	12 wks	185	Fri 3/8/19	Thu 5/30/19																						
187	7.6	Beazer Submit Pilot Test Workplan	0 wks	186	Thu 5/30/19	Thu 5/30/19																						
188	7.7	Review and Approval	8 wks	187	Fri 5/31/19	Thu 7/25/19																						
189	7.8	Conduct Pilot Test	28 wks	188	Fri 7/26/19	Thu 2/6/20																						
190	7.9	Preliminary Design	12 wks	189	Fri 2/7/20	Thu 4/30/20																						
191	7.10	Submit Preliminary Design	0 wks	190	Thu 4/30/20	Thu 4/30/20																						
192	7.11	Review and Comment	10 wks	191	Fri 5/1/20	Thu 7/9/20																						
193	7.12	Pre-Final Design	12 wks	192	Fri 7/10/20	Thu 10/1/20																						
194	7.13	Review and Comment	9 wks	193	Fri 10/2/20	Thu 12/3/20																						
195	7.14	Final Design	6 wks	194	Fri 12/4/20	Thu 1/14/21																						
196	7.15	Review and Approval	4 wks	195	Fri 1/15/21	Thu 2/11/21																						
197	7.16	EPA Approval of Final Design	0 wks	196	Thu 2/11/21	Thu 2/11/21																						
198	7.17	Prepare RAWP	8 wks	197	Fri 2/12/21	Thu 4/8/21																						
199	7.18	Submit RAWP	0 wks	198	Thu 4/8/21	Thu 4/8/21																						
200																												
201		8 Other Engineered Components: DESIGN TRACK #5	57 wks		Mon 8/6/18	Fri 9/6/19																						
202	8.1	Pre-Design Work Plan	5 wks		Mon 8/6/18	Fri 9/7/18																						
203	8.2	Submit Pre-Design Work Plan	0 wks	202	Fri 9/7/18	Fri 9/7/18																						
204	8.3	Review and Approval	6 wks	203	Mon 9/10/18	Fri 10/19/18																						
205	8.4	EPA Approval of Pre-Design Work Plan	0 wks	204	Fri 10/19/18	Fri 10/19/18																						
206	8.5	Pre-Design Investigation	13 wks	205	Mon 10/22/18	Fri 1/18/19																						
207	8.6	Preliminary Design	6 wks	206	Mon 1/21/19	Fri 3/1/19																						
208	8.7	Submit Preliminary Design	0 wks	207	Fri 3/1/19	Fri 3/1/19																						
209	8.8	Review and Comment	5 wks	208	Mon 3/4/19	Fri 4/5/19																						
210	8.9	Pre-Final Design	7 wks	209	Mon 4/8/19	Fri 5/24/19																						
211	8.10	Review and Comment	3 wks	210	Mon 5/27/19	Fri 6/14/19																						
212	8.11	Final Design	3 wks	211	Mon 6/17/19	Fri 7/5/19																						
213	8.12	Review	1 wk	212	Mon 7/8/19	Fri 7/12/19																						
214	8.13	EPA Approval of Final Design	0 wks	213	Fri 7/12/19	Fri 7/12/19																						
215	8.14	Prepare RAWP	8 wks	214	Mon 7/15/19	Fri 9/6/19																						
216	8.15	Submit RAWP	0 wks	215	Fri 9/6/19	Fri 9/6/19																						
217																												
218		9 Institutional Control	330.8 wks		Tue 7/9/13	Thu 11/7/19																						
219	9.1	Prepare Institutional Control Implementation and Assurance Plan (ICIAP)	6.8 wks	5	Tue 7/9/13	Fri 8/23/13																						
220	9.2	Submit ICIAP	0 wks	219	Fri 8/23/13	Fri 8/23/13																						
221	9.3	Review	12.5 wks	220	Mon 8/26/13	Wed 11/20/13																						
222	9.4	Beazer Respond to Comments	6 wks	221	Fri 10/12/18	Thu 11/22/18																						
223	9.5	Beazer Submit Responses & ICIAP Version 2	0 wks	222	Thu 11/22/18	Thu 11/22/18																						
224	9.6	Review	3 wks	223	Fri 11/23/18	Thu 12/13/18																						
225	9.7	EPA and FDEP Approval of ICIAP	0 wks	224	Thu 12/13/18	Thu 12/13/18																						
226	9.8	Implement Beazer-Property Restrictive Covenant	47 wks		Fri 12/14/18	Thu 11/7/19																						
227	9.8.1	Draft Proprietary Controls Package	13 wks	225	Fri 12/14/18	Thu 3/14/19																						
228	9.8.2	Submit Draft Proprietary Controls Package	0 wks	227	Thu 3/14/19	Thu 3/14/19																						
229	9.8.3	Review and Updating	8 wks	228	Fri 3/15/19	Thu 5/9/19																						
230	9.8.4	Update Title Search and Prepare Public Notice	8 wks	229	Fri 5/10/19	Thu 7/4/19																						
231	9.8.5	Beazer Publish Public Notice	0 wks	230	Thu 7/4/19	Thu 7/4/19																						
232	9.8.6	Public Comment Period	4.4 wks	231	Fri 7/5/19	Mon 8/5/19																						
233	9.8.7	Address Comments and Execute Restrictive Covenant	5 wks	232	Tue 8/6/19	Mon 9/9/19																						
234	9.8.8	Record Restrictive Covenant at Alacha County Clerk of C	0 wks	233	Mon 9/9/19	Mon 9/9/19																						
235	9.8.9	Prepare Final Proprietary Controls Package	8.6 wks	234	Tue 9/10/19	Thu 11/7/19																						
236	9.8.10	Submit Final Proprietary Controls Package	0 wks	235	Thu 11/7/19	Thu 11/7/19																						



Red text used for current tasks

Task Milestone Summary