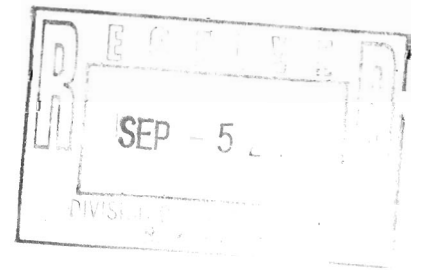


Brown and Caldwell

**Pre-Design Investigation
Work Plan
Troy (Water Street) Site
Operable Unit No. 1
Area 2 – Former Plant Site
Troy, New York**

September 2003



PRE-DESIGN INVESTIGATION WORK PLAN
TROY (WATER STREET) SITE
OPERABLE UNIT NO. 1
AREA 2 – FORMER PLANT SITE
TROY, NEW YORK

Prepared for:

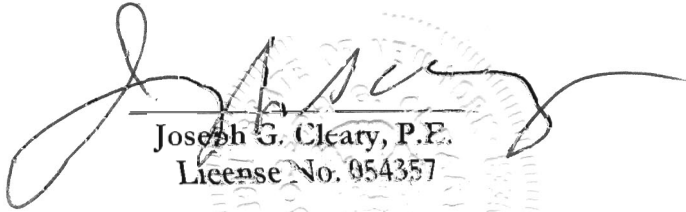
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September 2003

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1.0 INTRODUCTION

1.1 SITE LOCATION

Area 2 of the Troy (Water Street) Site (referred to hereafter as the "Site") is located in Troy, Rensselaer County, New York. Industrial operations in Area 2 began in the mid-1800's with iron and steel making facilities. A manufactured gas plant (MGP) was operated in Area 2 from approximately 1925 until the 1950's. Most of Area 2 is owned by King Fuels, Inc. which operates a bulk petroleum storage and distribution facility at the location. Niagara Mohawk, A National Grid Company (Niagara Mohawk) currently owns a small portion of Area 2, on which a natural gas regulator station is situated. The Site is bordered by a railroad spur owned by Conrail to the east, an active asphalt batch plant owned by Chevron USA, Inc. to the south and the Hudson River to the west. The Area 2 study area extends 50 feet north of the remnants of a 2,000,000 cu. ft former gas holder, which is located adjacent to the north bank of the Wynants Kill.

1.2 REMEDIAL HISTORY

Remedial activities at the Site are being conducted in accordance with the 1992 Administrative Order on Consent (Index # DO-0001-9210) between Niagara Mohawk and the New York State Department of Environmental Conservation (NYSDEC).

The remedial history chronology of Area 2 is as follows:

- Preliminary Site Assessment (June 1994 – September 1995)
- Remedial Investigation (September 1996 – September 1998)
- Supplemental Investigations and Feasibility Study (September 1998 – 2002)
- Proposed Remedial Action Plan (February 2003)
- Record of Decision (ROD) (July 2003)

1.3 DESCRIPTION OF SELECTED REMEDY

As described in the ROD, the elements of the selected remedy include the following:

- Excavation to a depth of 18 feet below the existing ground surface (bgs) and appropriate off-site disposal of contaminated soil containing total PAHs greater than 500 ppm or visual tar or non-aqueous phase liquid (NAPL). Visual tar or NAPL requiring removal/treatment was defined in the ROD as soil found to be saturated with NAPL, or have visually observable separate phase product. Soils exhibiting odors, staining and/or sheens will not be considered visual tar or NAPL for removal.
- Treatment, in place, by a chemical oxidation process for soil deeper than 18 feet bgs containing total PAHs greater than 500 ppm or visual tar or NAPL.
- Removal of the contents of several structures and the structures themselves, as necessary.
- Removal and appropriate disposal of purifier waste.
- Placement of an asphalt cap or permeable soil cover over the entire site, excluding the building footprints.
- Monitored natural attenuation of groundwater consistent with USEPA guidance.
- Establishment of institutional controls to limit development to nonresidential uses; prohibit groundwater use; evaluate potential impact of soil vapor on indoor air quality in onsite buildings and ensure the integrity of the remedy, including a long term monitoring plan.

Based upon the findings of the previous investigations at Area 2 of the Troy Water Street Site, several data objectives need to be addressed during the pre-design investigation prior to

the implementation of the selected remedy. The NYSDEC identifies several data objectives in the Record of Decision (ROD). The Pre-Design Investigation Work Plan, contained herein, addresses these data objectives.

1.4 REPORT ORGANIZATION

The Pre-Design Investigation Work Plan is organized as follows:

- Section 2.0 Data Objectives
- Section 3.0 Scope of Work
- Section 4.0 Project Deliverables
- Section 5.0 Project Organization
- Section 6.0 Project Schedule

2.0 DATA OBJECTIVES

The data objectives identified by the NYSDEC in the ROD are as follows:

- Investigation of previously uninvestigated pipes, tanks, and other structures.
- Investigation of the area adjacent to the lime sump.
- Additional delineation of the areas designated for removal/treatment.
- Evaluation of potential exposure to building occupants from residual air contaminants of MGP origin subsequent to the implementation of the proposed remedy.

Additionally, the following data objective was identified to provide the details necessary for the construction of the remedial program:

- Evaluation of soil characteristics for in situ treatment.

3.0 SCOPE OF WORK

In this section, the specific tasks necessary to address the data objectives outlined in Section 2.0 are described.

The proposed scope of work described herein may be modified based on actual conditions encountered in the field. It should be noted that the boring locations shown on the figures contained herein are approximate. Adjustments to the locations and number of borings installed, and the parameters specified for analysis may be necessary based upon a variety of factors, such as site access, the presence of subsurface utilities or other obstructions, and site conditions determined during the course of the investigation. If field conditions necessitate major modifications to the PDI scope of work described herein, they will be submitted to the NYSDEC in the form of an addendum and the proposed modifications will not be implemented prior to NYSDEC approval.

3.1 TANK ASSESSMENT

An inspection of tanks remaining at the site that were not previously investigated will be conducted to document and characterize the tank and tank contents. The tank characterization will include, but will not be limited to, the tanks within the former benzol building and the tar collecting and flushing liquor tanks identified in the ROD. There is currently no visible evidence at the site to indicate where the tanks are located; therefore, historical drawings and available data will be reviewed to attempt to locate these tanks. One or more test pits will be performed at each tank location. The dimensions and general condition of the tanks and the quantity of any contents, if present, will be assessed. Additionally, the contents of the tanks, if any, will be sampled and submitted to the laboratory for analysis of the full target compound list/target analyte list (TCL/TAL).

3.2 PIPES AND STRUCTURES ASSESSMENT

An evaluation of observed pipes and structures previously not investigated will be conducted to document and characterize their contents, if any. These will include, but will not be

limited to, the pipes traversing the Wynants Kill and the piping and structures present in the former Water Gas Building.

The inspection of aboveground structures and pipes will include visual inspection and sampling of any material present within the structures and pipes. Additionally, the inspection of subsurface structures and pipes will include test pit excavations to assist in documenting the presence and contents of these structures. Remotely operated television equipment may be used if needed to adequately characterize piping. Each sample collected as a result of either the aboveground or subsurface investigations will be submitted to the laboratory for analysis of the full TCL/TAL parameter list.

3.3 SOIL GAS SURVEY

A soil gas survey will be conducted along the perimeter of the Corporate Express Building to evaluate the potential exposure of building occupants to residual air contaminants of MGP origin. The soil gas survey will consist of 10 soil gas probes located around the building, as depicted on Figure 3-1. Permanent soil gas implants, consisting of 0.0057 inch (0.145 mm) pore diameter double woven stainless steel screens, will be installed using direct-push drilling techniques (e.g., Geoprobe®). Each soil gas probe will be installed approximately 2 to 3 feet below ground surface (bgs); however, findings from the initial site visit and building data evaluation may result in adjustments, e.g., findings related to the configuration of the building foundation.

Soil gas samples will be collected from each soil gas probe utilizing a passivated stainless steel pressure canister (SUMMA® or other equivalent specially prepared canisters) and submitted to the laboratory for analysis. In addition, a background ambient air sample will be collected over an 8-hour period utilizing a passivated stainless steel pressure canister and submitted to the laboratory for analysis. The soil gas and ambient air samples will be analyzed by gas chromatography/mass spectrometry utilizing EPA Method TO-15. Soil gas samples will be collected during a dry period to avoid surficial soil saturation in order to collect a representative sample.

3.4 SOIL QUALITY CHARACTERIZATION

The soil lithology for each soil boring will be described continuously within the target interval by the Field Geologist utilizing the Burmister Soil Classification System. Surficial soil samples will be collected and screened from 0.0 – 1.0 ft and subsurface soil samples will be collected and screened at discrete 2-ft intervals. Soil samples will be screened in the field for organic vapors using a photoionization detector and obvious visual or olfactory indicators of contamination will be recorded.

The default interval for collecting a sample for laboratory analysis in each boring will be the depth of exceedances of the total PAHs threshold of 500 ppm or visual identification of tar or NAPL in adjacent borings. In the case where the vertical extent of total PAHs above 500 ppm or visual tar/NAPL was delineated in an existing adjacent boring, samples for laboratory analysis will be collected from a depth below the bottom depth of the existing adjacent boring. However, sample intervals may be adjusted based on the conditions encountered in the field, in which case, the results of the field screening may be utilized to assist in the selection of an alternate sample interval.

The number of samples submitted to the laboratory for analysis will be based on the length of the interval in adjacent borings impacted by exceedances of the total PAHs threshold of 500 ppm or visual identification of tar or NAPL. Each 10 ft interval meeting the aforementioned criteria will result in one sample being collected from a 1 to 2 ft interval within the 10 ft interval, which will be submitted to the laboratory for analysis of polycyclic aromatic hydrocarbons (PAHs) per the generic Quality Assurance Project Plan (QAPP).

At existing borings that indicate further delineation is required due to visual identification of soil saturated with tar or NAPL or visually observable separate phase product, one (1) boring will be advanced approximately 10 ft away from the existing boring in each of the four cardinal compass directions (north, south east and west), i.e. typically four borings in total. If visual identification of tar or NAPL is evident in these borings, additional borings will be advanced in the appropriate compass direction(s) at approximately 10 ft increments until the tar/NAPL meeting the aforementioned criteria is no longer observed. At locations

where visual signs of tar or NAPL meeting the aforementioned criteria are no longer evident analytical samples will be collected according to the aforementioned guidelines.

Alternatively, at existing borings that indicate further delineation is required due to exceedances of the total PAHs threshold of 500 ppm, but which do not have visual indications of tar/NAPL, two (2) borings advanced in each compass direction approximately 10 ft away from the boring and approximately 10 ft apart, i.e., typically eight borings in total. Each boring will have analytical samples collected and submitted to the laboratory for analysis in accordance with the aforementioned guidelines. The analytical samples submitted from the borings directly adjacent to the previously existing boring will be analyzed first upon arrival at the laboratory, whereas the analytical samples submitted from the borings located approximately 20 ft away from the previously existing boring will be analyzed pending the results of the adjacent borings. If the total PAH concentration in a sample(s) from the second set of analyses is above 500 ppm, additional sampling will be considered to complete the delineation, depending on field conditions and/or information collected during the course of the investigation.

The areas requiring further delineation per the ROD are based on exceedances of the total PAHs threshold of 500 ppm or visual identification of tar or NAPL during previous investigations. These criteria have been selected as the basis for determining the limits of removal/treatment for the selected remedy. To determine the limits of removal/treatment 58 soil borings will be advanced at the locations shown on Figure 3-2; however, additional soil borings may be advanced if these proposed borings exhibit soil saturated with tar or NAPL or visually observable separate phase product or if exceedances of the total PAHs criterion of 500 ppm occur. The locations selected for delineation and the rationale are as follows:

- MW-5 will be further delineated through the advancement of 1 soil boring approximately 10 ft away from MW-5 in each direction, as depicted on Figure 3-2. Additional borings will be advanced, if necessary, in each direction at approximately 10 ft increments until visual signs of tar or NAPL are no longer evident in each direction. Each boring will have analytical samples collected and submitted to the

laboratory for analysis in accordance with the aforementioned guidelines. The rationale for the borings is provided in Table 3-1.

- SB-18 will be further delineated by advancing 1 soil boring approximately 10 ft north, south, and west of SB-18. Soil borings will not be advanced east of SB-18 because the limit in this direction has been delineated by boring MW-18. Additional borings will be advanced, if necessary, in each direction at approximately 10 ft increments until visual signs of tar of NAPL are no longer evident in each direction. Each boring will have analytical samples collected and submitted to the laboratory for analysis in accordance with the aforementioned guidelines. The rationale for the borings is provided in Table 3-1.
- SB-28 will be further delineated by advancing 1 boring approximately 10 ft away from SB-28 in each direction. Additional borings will be advanced, if necessary, in each direction at approximately 10 ft increments until visual signs of tar of NAPL are no longer evident in each direction. Each boring will have analytical samples collected and submitted to the laboratory for analysis in accordance with the aforementioned guidelines. The rationale for the borings is provided in Table 3-1.
- TP-10 will have 1 boring advanced approximately 10 ft north, south, and east of TP-10. Soil borings will not be advanced west of TP-10 because the limit in this direction has been delineated by boring MW-20. The boring locations are provided on Figure 3-2. Additional borings will be advanced, if necessary, in each direction at approximately 10 ft increments until visual signs of tar of NAPL are no longer evident in each direction. Each boring will have analytical samples collected and submitted to the laboratory for analysis in accordance with the aforementioned guidelines. The rationale for the borings is provided in Table 3-1.
- The area adjacent to the former lime sump will be investigated by advancing 4 borings, including one on each side of the former sump. The boring locations are provided on Figure 3-2. Additional borings will be advanced, if necessary, in each

direction at approximately 10 ft increments until visual signs of tar of NAPL are no longer evident in each direction. Each boring will have analytical samples collected and submitted to the laboratory for analysis in accordance with the aforementioned guidelines. The rationale for the borings is provided in Table 3-1.

- MW-2 will have 2 borings advanced approximately 10 ft away from the boring and approximately 10 ft apart east and south of MW-2. Soil borings will not be advanced north of MW-2 because the limit in this direction has been delineated by boring SB-34 and soil borings will not be advanced west of MW-2 because of access issues. Each boring will have analytical samples collected and submitted to the laboratory for analysis in accordance with the aforementioned guidelines. The rationale for the borings is provided in Table 3-1.
- MW-6 will be further delineated through the advancement of 1 soil boring approximately 10 ft away from MW-6 in each direction, as depicted on Figure 3-2. Additional borings will be advanced, if necessary, in each direction at approximately 10 ft increments until visual signs of tar of NAPL are no longer evident in each direction. Each boring will have analytical samples collected and submitted to the laboratory for analysis in accordance with the aforementioned guidelines. The rationale for the borings is provided in Table 3-1.
- TP-15 will have 2 borings advanced approximately 10 ft away from the boring and approximately 10 ft apart north, south, and west of TP-15. Soil borings will not be advanced east of TP-15 due to the presence of the Benzol Building. Each boring will have analytical samples collected and submitted to the laboratory for analysis in accordance with the aforementioned guidelines. The rationale for the borings is provided in Table 3-1.
- The limits of the removal/treatment area north and west of the former Water Gas Plant will be further delineated through the advancement of 13 borings within this area, including 3 borings beneath the floor within the former Water Gas Plant

building, as shown on Figure 3-2. Table 3-1 provides the depths and rationale for the borings. The soil borings within the former Water Gas Plant building will be advanced, if permitted, subsequent to a building inspection to evaluate the integrity and structural stability of the structure. Modifications may be necessary based upon the findings of the building inspection.

- To further define the limits of the removal/treatment area north and northwest of the Corporate Express Building approximately 13 borings will be advanced, as indicated on Figure 3-2. Table 3-1 provides the proposed depths and rationale for each boring.

Soil borings, with the exception of the borings with the former Water Gas Plant building, will be advanced using a hollow stem auger. Soil samples will be collected from the borings using a 2-foot long split-spoon sampler with samples collected continuously over the interval in adjacent borings impacted by exceedances of the total PAHs threshold of 500 ppm or visual identification of tar or NAPL. The drilling method that will be utilized for the borings within the former Water Gas Plant building will be determined following the building inspection. Detailed drilling procedures are provided in the generic Field Sampling Plan (FSP).

3.5 IN SITU TREATMENT PARAMETERS

A subset of soil samples will be selected from the borings being advanced to delineate the limits of the removal/treatment areas to aid in the evaluation of the remediation technologies. Approximately 12 soil samples will be selected from the areas requiring delineation for in situ treatment and submitted to the laboratory for fractional organic carbon (foc) analysis. The foc will provide information regarding the natural organic carbon content to assist in determining the amount of oxidant required to achieve cleanup goals. Additionally, 4 soil and 4 groundwater samples, including 1 from each area to receive in situ treatment, will be collected for oxidant demand to aid in determining the amount of oxidant required to achieve cleanup goals.

3.6 HYDRAULIC CONDUCTIVITY TESTS

In order to determine the in-place hydraulic conductivity of the unconsolidated geologic material screened by the existing monitoring wells, variable head slug tests will be performed. These tests involve either rising or lowering the water level in the well and measuring the change in head with respect to time as the well is allowed to recover back to static conditions. Rising and/or falling head tests will be conducted in all existing monitoring wells per the generic FSP.

3.7 AS-BUILT SURVEY

Upon completion of the field investigation, a New York-licensed surveyor will survey the locations and elevations of the new data collection points. Horizontal locations will be referenced to the North American Datum (NAD 1983) on the reference ellipsoid associated with the Geodetic Reference System (GRS 80). Coordinates are based on the New York State Plane Geodetic System of 1983 (Eastern Zone 3101).

Table 3-1
Rationale for Pre-Design Investigation Soil Samples

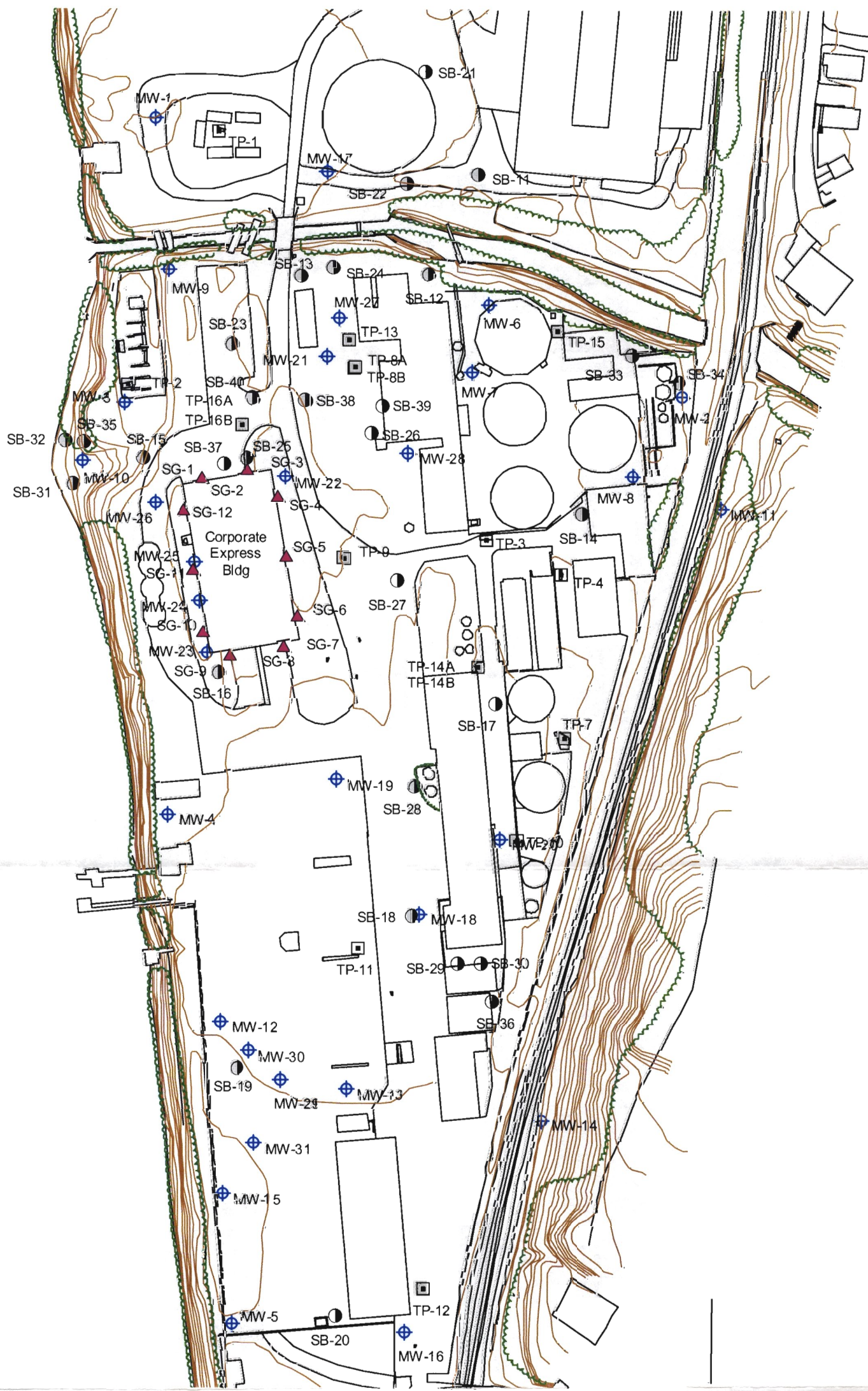
Location	Borings	Exceedance of Total PAHs Criterion	NAPL/ Coal Tar Detected	Vertically Delineated	Number of Borings Proposed *	Approximate Boring Depths (ft bgs)	Number of laboratory samples per boring
Southwest corner of property	MW-5	18-20 ft bgs	Heating Oil @ 24-26 ft	34 ft bgs	4	34	2
West of Former By-Products Building	SB-18	5-7 ft bgs	Tar strands @ 5-7 ft bgs	9 ft bgs	3	9	1
West of Former By-Products Building	SB-28	10 and 20 ft bgs	Coal tar @ 2-4 ft, 8.5 ft, 14-20 ft	26 ft bgs	4	20	2
East of Former By-Products Building	TP-10	2 ft bgs	Tar-like material @ 1-2 ft	No	3	≥ 3	1
Lime Sump		9 ft bgs @ TP-7	TP-7 - Viscous tar @ 2.5 - 9 ft	No	4	≥ 10	1
Northeast Corner	MW-2	14 to 16 ft bgs	No	22 ft bgs	4	22	1
South of Former Water Gas Plant	MW-6	6 and 16 ft bgs	Tar 6-10 ft	26 ft bgs	4	26	1
North of Former	TP-15	9 ft bgs	No	No	6	≥ 10	1

Table 3-1
Rationale for Pre-Design Investigation Soil Samples

Location	Borings	Exceedance of Total PAHs Criterion	NAPL/ Coal Tar Detected	Vertically Delineated	Number of Borings Proposed *	Approximate Boring Depths (ft bgs)	Number of laboratory samples per boring
Benzol Building							
Area north and west of Former Water Gas Plant	TP-13	6 ft bgs	No	No	13	45	4
	SB-13	16-17 ft bgs	Tar @ 16-17 ft	19 ft bgs			
	SB-24	18, 24, and 26 ft bgs	Tar @ 10-24 ft	31 ft bgs			
	MW-21	16-18, 22-24 ft bgs	Tar @ 16-31 ft	34 ft bgs			
	MW-27	11-13, 21-23 ft bgs	Taffy-like material @ 9-15 ft Tar like @ 15-17 ft Product @ 19-31 ft	37 ft bgs			
Benzol Building	SB-38	12, 24, and 34 ft bgs	No	36 ft bgs			
	SB-39	41 ft bgs	Tar like material @ 37-45 ft Product @ 43-44 ft	Yes @ 63'			
Area north and northwest of Corporate Express Building	SB-15	22-24 ft bgs	Petroleum 24-26, 32-36 ft	48 ft	13	38	4
	MW-10	8 ft bgs	Coal tar @ 0-4 ft, 8-10 ft	18 ft bgs			
	SB-25	uncertain**	Coal tar @ 4-12 ft	No			
	MW-22	No	Product @ 34.9-35 ft	No			
	MW-26	No	Product, Tar @ 29-32.5 ft	33 ft bgs			
	SB-37	8, 18, and 26 ft bgs	No	Yes @ 36 ft bgs			

* Represents minimum number of borings to be advanced. Additional borings may be advanced if further delineation is required.

** Sample interval reported as 24.5 ft, however boring log indicates boring was terminated at 12 ft.

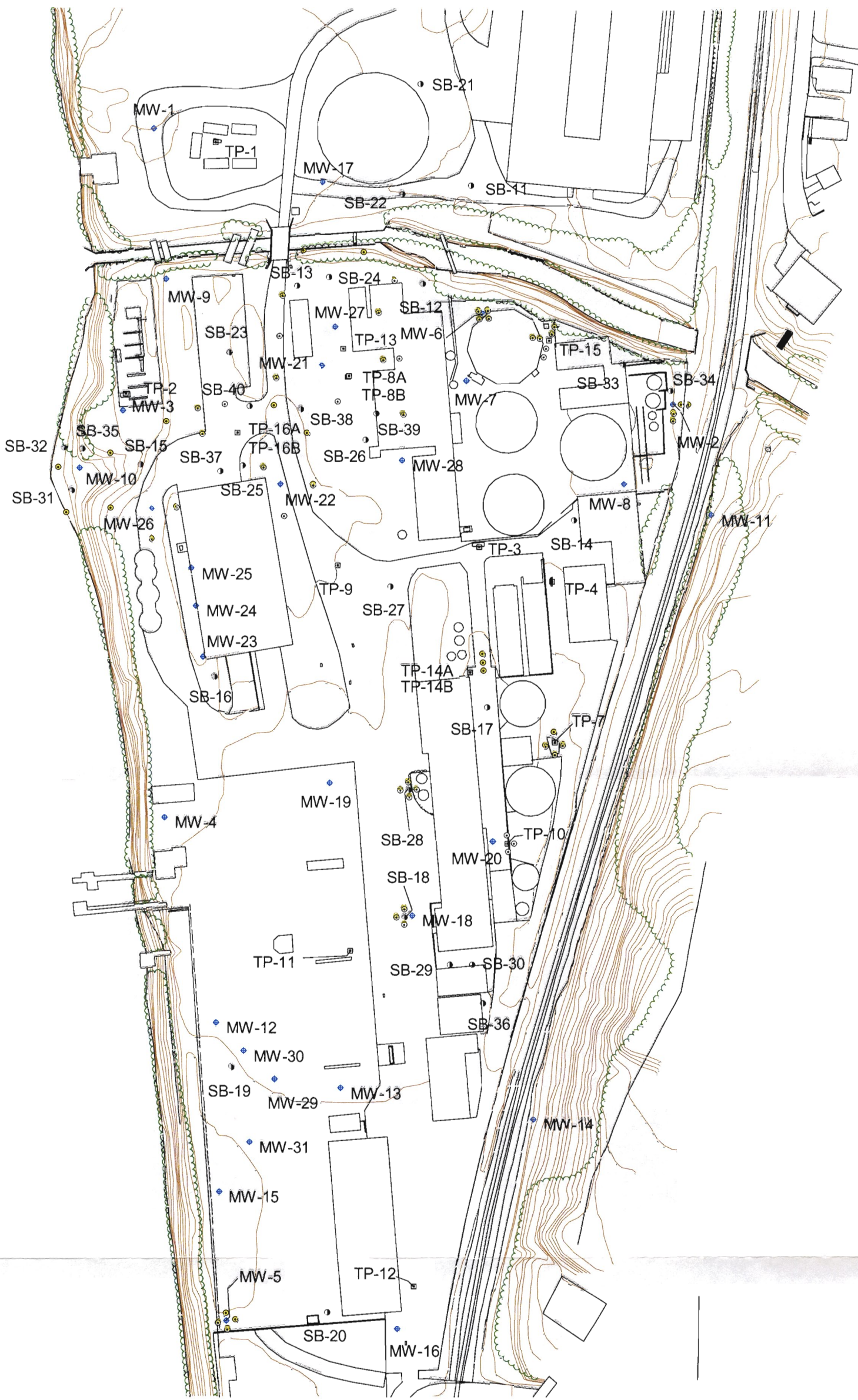


140 0 140 280 Feet

LEGEND

- ▲ Proposed Soil Gas Probe Locations
- ⊕ Monitoring Well Location
- Previous Soil Boring Location
- Previous Test Pit Location
- VEGETATION
- CONTOUR

Figure 3-1
PROPOSED SOIL GAS LOCATIONS
 Water Street (Area 2)
 Troy, New York
BROWN AND CALDWELL



70 0 70 140 Feet

LEGEND	
	Proposed Soil Boring Location
	Monitoring Well Location
	Previous Soil Boring Location
	Previous Test Pit Location
	VEGETATION
	CONTOUR

Figure 3-2
PROPOSED SOIL BORING LOCATIONS
 Water Street (Area 2)
 Troy, New York
BROWN AND CALDWELL

4.0 PROJECT DELIVERABLES

The major submittals to the NYSDEC for the Pre-Design Investigation are as follows:

- Draft and Final Pre-Design Investigation Work Plan
- Pre-Design Investigation Write up
- Pre-Design Pilot Test Work Plan
- Pre-Design Pilot Test Write up
- Remedial Design Work Plan

The deliverables will be submitted to the NYSDEC in accordance with the schedule presented in Section 6.0.

5.0 PROJECT ORGANIZATION

The principal points of contact for this project as follows:

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Ms. Michael Lotti
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Northborough, Massachusetts 01532-1555
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Mr. Matt Steves
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Queensbury, NY 12801
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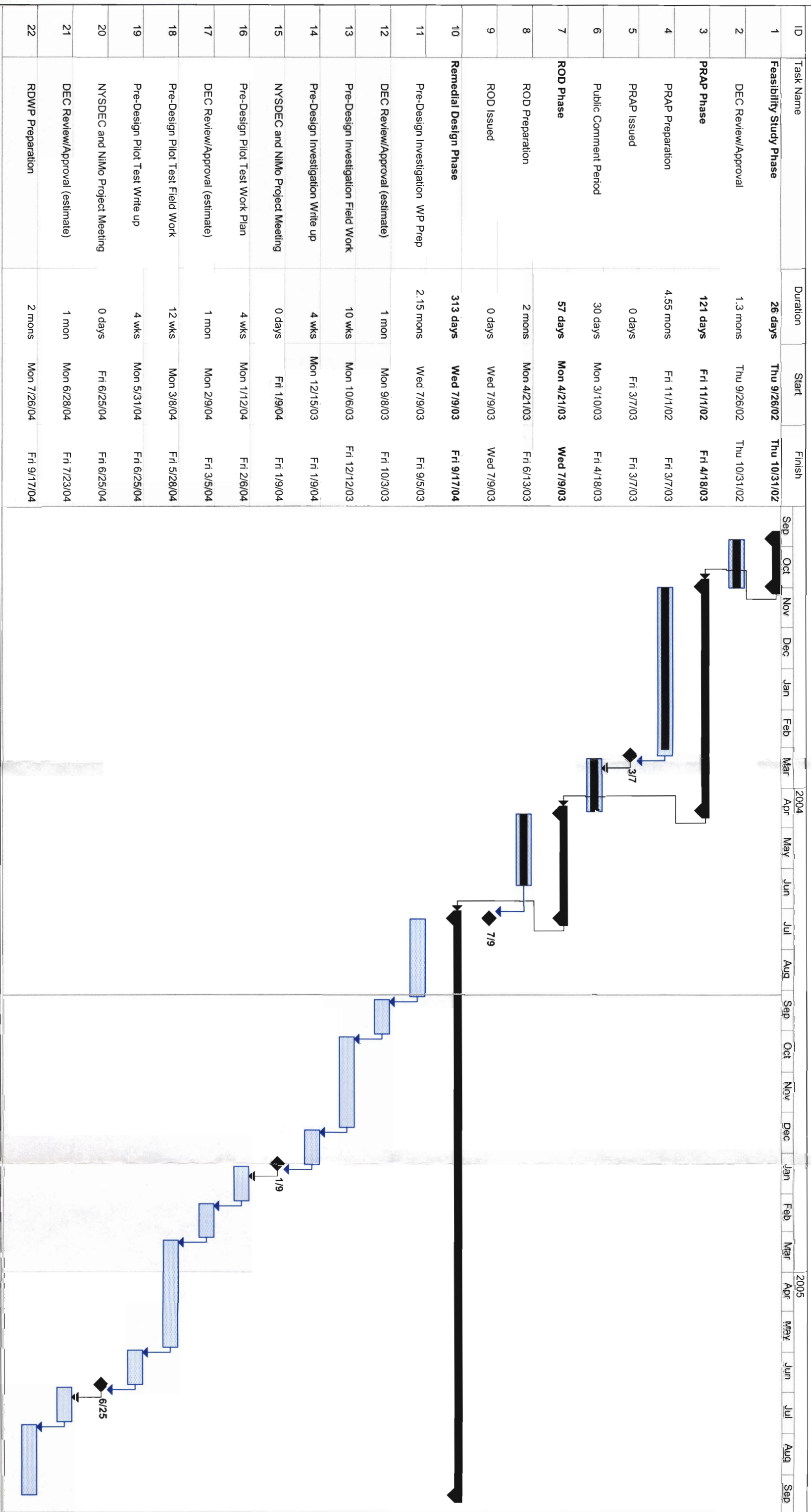
Data Validation Services

Ms. Judy Harry
120 Cobble Creek Road
PO Box 208
North Creek, NY 12853
Telephone: (518) 251-4429

6.0 PROJECT SCHEDULE

The proposed project schedule is shown on Figure 6-1. A major assumption of the schedule is the estimated duration of the NYSDEC review period for document submittals. The duration of the schedule will vary if the regulatory review period is greater or less than that shown.

FIGURE 6
PROJECT SCHEDULE
WATER STREET (AREA 2)
TROY, NEW YORK



Project: Troy Area 2 (King Fuels)
Date: Thu 9/4/03

Task Split

Progress Milestone

Summary Project Summary

External Tasks External Milestone

Deadline

FIGURE 6
PROJECT SCHEDULE
WATER STREET (AREA 2)
TROY, NEW YORK

- 1 Feasibility Study Phase**
Duration includes development of wp thru submittal of first draft
- 2 DEC Review/Approval**
Duration is from receipt of first draft thru issuance of final approval letter. Also includes time for NM to revise and resubmit
- 10 Remedial Design Phase**
180 days per Consent Order unless revised by letter request or accepted schedule