

# **Quality Control Plan**

**Site Investigation of Acid Areas  
Former Plum Brook Ordnance Works  
Sandusky, Ohio**

**Prepared By:**

**IT Corporation  
312 Directors Drive  
Knoxville, Tennessee 37923**

**Submitted To:**

**Commander  
U.S. Army Engineer District, Nashville  
Post Office Box 1070  
Nashville, Tennessee 37202-1070**

**Revision 1**

**Delivery Order 030  
Contract Number DACA62-94-D-0030  
IT Project Number 773206**

**October 21, 1997**

**SIGNATURE PAGE**

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Site Investigation of Acid Areas  
Plum Brook Ordnance Works  
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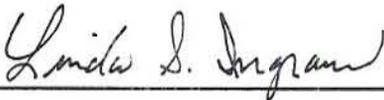


**Don C. Burton, P.E.  
Program Manager  
IT Corporation**

10/21/97

**Date**

**Accepted By:**



**Linda Ingram  
Technical Manager, Technical Management Section  
U.S. Army Engineer District, Nashville**

23 Oct 1997

**Date**



**John W. Hall  
Chief, Technical Management Section  
U.S. Army Engineer District, Nashville**

10/27/97

**Date**

**Quality Control Plan  
Site Investigation of Acid Areas  
Former Plum Brook Ordnance Works, Sandusky, Ohio**

**October 21, 1997**

**PROJECT OBJECTIVE AND TASKS**

This Quality Control Plan (QCP) has been prepared in support of the Site Investigation (SI) of the Acid Areas at the former Plum Brook Ordnance Works (PBOW) in Sandusky, Ohio, under Delivery Order (DO) 030 of IDT Contract DACA62-94-D-0030. The purpose of DO 030 is to conduct the SI of the former Acid Areas to evaluate the following Project Decision (PD) Statements:

- Determine if hazardous substances at the Acid Areas comply with ARARs
- Determine if there are hazardous substances present at the site in a manner that constitutes an unacceptable risk to human health and the environment.

These PD Statements will be evaluated using judgmental sampling and/or random sampling in Acid Areas 1 through 3 at the PBOW. In addition to the specified PDs, the quality of the collected data will be such that it can be used to conduct a human health risk assessment. Specific objectives of this investigation are to determine the presence of potential contaminants of concern in the soils of the investigated areas and to initially characterize the overburden materials for evaluation of potential contaminant migration. Specific tasks to be accomplished under this project include:

**Task 1: Preparation and Submittal of Quality Control Plan (QCP).** IT will prepare and submit a Quality Control Plan (QCP) for the work to be conducted at PBOW. The QCP will be prepared in accordance with the requirements of ER 1110-1-12, *Quality Management*, and CEORD 1110-1-9, *Quality Control*. A verification statement will be included with all products submitted to the Government under this SOW. The statement will be signed by the independent reviewers identified in the QCP, stating that they have reviewed the applicable document or product and that all internal comments have been resolved, thus completing the product for release to the Government. All comments generated by reviewers of a product or document, along with their resolution, will be submitted with the verification statement.

**Task 2: Records Review.** IT Corporation will conduct a one day site visit to PBOW to gather more information for preparation of the project work plans. This site visit will

include taking still photographs of pertinent features of the sites and reviewing site plans available at PBOW regarding the presence of a maintenance shop and a power substation within or near Acid Areas #1 and #2. The review will be of sufficient detail to support the collection of samples and to identify sampling locations in the vicinity of the maintenance shops and/or power substations.

**Task 3: Preparation and Submittal of Site-Specific Addenda to the SHP and SAP.** IT Corporation will prepare a SSHP for this work as an addendum to the PBOW Site-Wide Safety and Health Plan (SHP) of the *Site Investigations and Groundwater Investigations Work Plans* (IT, September 1996). The SSHP will be prepared under the supervision of a CIH, and will comply with the following requirements, as a minimum:

- Federal Acquisition Regulations (FAR), Clause 52.236-13, *Accident Prevention*.
- U.S. Army Corps of Engineers (AE), *Safety and Health Requirements Manual*, EM 385-1-1, October 1992.
- Occupational Safety and Health Administration (OSHA) *Construction Industry Standards*, 29 CFR 1926; and *General Industry Standards*, 29 CFR 1910; with particular emphasis on 29 CFR 1910.120, *Hazardous Waste Site Operations and Emergency Response*.
- NIOSH / OSHA / USCG / EPA, *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities*, October 1985.
- USACE *Safety and Occupational Health Document Requirements for Hazardous, Toxic, and Radioactive Waste (HTRW) Activities*, Appendix B, ER 385-1-92.
- USACE Contractor Guidelines for (1) *The Preparation of the Accident Prevention Proposal* (Safety Plan), and (2) *The Preparation of the Activity Hazard Analysis*, ORNP 385-1-2, May 1986.
- Nuclear Regulatory Commission Standards (10 CFR 19 – 171).
- Other applicable federal, state, and local safety and health requirements.

The SSHP Addenda required by 29 CFR 1910.120(b)(4), 29 CFR 1926.65(b)(4) and as defined by the SOW will describe the health and safety procedures, practices, and equipment to be implemented and utilized to protect affected personnel from the potential hazards associated with the site-specific tasks to be performed. The level of detail provided in the addenda will be tailored to the type of work, complexity of operations to be accomplished, and hazards anticipated.

IT Corporation will also prepare a SSAP for this work as an addendum to the PBOW Site-Wide Sampling and Analysis Plan (SAP) of the *Site Investigations and Groundwater Investigations Work Plans* (IT, September 1996). The SSAP will be compatible with previously approved SSAPs and in accordance with the SAP, EM 200-1-3, EM 1110-1-4000, and ER 1100-1-263.

The SSHP and SSAP will be submitted to the USACE and Ohio EPA for review and approval prior to commencement of any field work. All work will be performed according to the approved plans. Review comments received on the draft SSHP and SSAP will be addressed and incorporated into the final documents. Responses to the technical review comments will be included with the submittal of the final document.

**Task 4: Sampling.** A kickoff and coordination meeting will be held at the PBOW site prior to beginning field activities associated with this investigation. IT will present details of the SI for discussion and coordination, including digging permits and utility clearances, with CELRN and NASA PBS representatives.

A total of 56 soil borings will be drilled and sampled during the SI. Surficial soil samples (0 - 12 inches) will be collected from each of the borings. Additionally, subsurface soil samples will be collected at depth intervals to be determined in the field (a total depth of 9 to 10 feet is assumed for each boring). From selected borings, a total of twelve (12) geotechnical samples will be collected. Geotechnical samples will be tested for moisture content, Atterberg Limits, and grain size distribution. Upon completion of sample collection, each borehole will be backfilled with the soil cuttings removed from the borehole during drilling. A qualified geologist will be on-site for all drilling and soil sampling activities. Soil materials will be sampled continuously in all borings using stainless steel split spoons or continuous samplers. In addition to the information required by EM 200-1-3, the geologist will visually classify and log borehole materials according to the USCS, EM 1110-1-4000, and CELRN's *HTRW Design Branch Logging Manual*. Soil borings will be logged in the field using ENG Form 5056-R and 5056A-R.

**Task 5: Analytical Requirements.** IT will manage all analytical data beginning at the point of sampling, continuing through laboratory analysis, data reporting, data evaluation, and culminating with the required electronic data submittal. Under this task, samples will be packaged and shipped from field, submitted for analysis, and tracked through the laboratory system. Reported data will be reviewed, validated as required, and entered into an Oracle database for use by IT technical staff in the preparation and submittal of required reports, statistical analyses, and electronic data submittals.

**Quality Assurance Sample Collection and Analysis.** IT will coordinate, collect, package, and ship the required frequency (5%) of QA samples to the QA laboratory specified in the SOW for this effort. The U.S. Army Corps of Engineers, Northwest

Division Laboratory has been identified as the QA laboratory. Field split samples will be collected at the frequency specified and submitted to:

U.S. Army Corps of Engineers, Northwest Division Laboratory  
CENWO-LB, ATTN: Mr. Douglas Taggart  
420 South 18<sup>th</sup> Street  
Omaha, Nebraska 68102-2586

**Analytical Data Review, Reporting, and Assessment Requirements.** Data will be extensively reviewed by the laboratory in accordance with the three-level process specified in EM 200-1-3. Documentation of this review will be included in the data package(s) submitted. A systematic technical review and validation will be performed for all environmental samples and field duplicates to ensure data quality and overall accuracy. The extent of the review and validation will be comparable to a Level III data validation. The Functional Guidelines for Organic and Inorganic Review (February 1993 and 1994) will be followed in the evaluation as well as the submitted laboratory SOPs and the guidance and project limits presented in the SSAP.

As a component of the field module of the Oracle database, samples will be logged with all associated field QC samples, including duplicates, splits, field blanks, and trip blanks, as required. The information will be forwarded in hardcopy and electronically to the Northwest Division Laboratory as well as to CELRN for their use in data evaluation and preparation of the Chemical Quality Assurance Report. All sample planning, collection, and tracking information will be maintained in the field module. This information will then be down-loaded to the Oracle database to act as a template and basis of comparison for the analytical data to be received.

**Task 6: Disposal of Investigation Derived Waste.** Investigation derived wastes (IDW) to be generated during this project include soil cuttings from soil boring drilling and sampling, PPE, and decontamination water. Soil cuttings from soil borings will be returned to the borehole following sample collection. PPE will be double bagged and placed in an on-site industrial dumpster for disposal at an industrial landfill. Aqueous IDW, decontamination water, will be placed in 55-gallon drums and stored at the site for later disposal. It is assumed that aqueous wastes may be disposed of on-site by pouring the drum contents on the ground in an area of known contamination.

**Task 7: Geographic Information System Deliverable.** IT will develop a database of collected geologic and chemical information for this SI. This database will include information related to the boring locations, surveyed coordinates and elevations, and chemical (analytical) data. The deliverable package will be formatted as specified in the *Data Standard for Corps of Engineers Environmental Restoration Sites* and the *Tri-Service Spatial Data Standards (TSSDS)*.

**Task 8: Preparation and Submittal of Draft Site Investigation Report.** The draft SI Report will be prepared to summarize the findings of this site investigation. To efficiently manage all analytical data generated from this investigation, the project management team will implement and maintain a database. Following the completion of data validation activities, analytical reports will be generated from the database. Validated blank corrected analytical results will be compared against EPA Region III derived risk-based concentrations (RBC) and presented in the report. Fifteen copies of the draft investigation report will be submitted to the USACE Nashville District.

**Task 9: Draft Report Meetings.** IT personnel will attend two (2) project meetings; one will be held at the PBOW site and one at the USACE offices in Nashville, Tennessee. The purpose of these meetings will be to discuss significant issues with the regulatory agencies, the USACE Nashville project team, and IT.

**Task 10: Preparation and Submittal of Final Site Investigation Report.** Upon completion of review and comment resolution regarding the draft SI Report, IT will prepare and submit twenty copies of the final SI Report for USACE approval. Technical review comments on the draft document will be addressed in writing, and required changes will be incorporated in the final SI Report.

#### **KEY IT PROJECT PERSONNEL**

- **Program Manager** - Mr. Don C. Burton, P.E., will serve as the Program Manager.
- **Project Manager** - Mr. Mikael L. Spangberg, will serve as IT's Project Manager.
- **Principal Investigator** - Mr. Steven Muffler, R.P.G., will serve as the Principal Investigator.
- **QA Manager** - Mr. Tony Smith, will serve as the QA Manager.
- **HSO Officer** - Ms. Melissa G. Smith, CIH, will serve as IT's HSO Officer.
- **Project QC Officer** - Ms. Kim Arrant will serve as Project QC Officer.

#### **QUALITY ASSURANCE/QUALITY CONTROL (QA/QC) REVIEW**

This section of the QCP summarizes the IT internal technical and external peer review. The IT QA program provides controls for the formal verification (checking) of documents such as calculations and the presentation of information in the form of drawings, logs, and tables. Review and necessary approvals are also cited for quality-related documents; however, during the course of a project or proposal, verification of technical decisions and concepts (such as interpretation of data and evaluation of results) is required in order that the project or proposal

can proceed on a sound conceptual basis. The review concept, or approach, may be needed for the following:

- During the project planning stage, have appropriate steps been implemented to satisfy the goals and objectives of the project?
- Are data of sufficient quality and properly interpreted so that conclusions can be justified and demonstrated?
- Are design parameters reasonable for the computations performed? What is the effect of variations of the assumptions upon the results?
- Do the results presented by IT in the form of a report, or other document, adequately represent the work performed and the conclusions reached? Do the results fulfill the objectives of the project?

The internal technical review process is used to verify these steps. Documents to be written during a project and indicated in the proposal will be subjected to an internal review process consisting of technical and peer reviews. The IT PM will complete a matrix of these documents on a delivery order basis, receive the Program Manager's concurrence, and use it to obtain the required reviews. Technical reviewers are selected from the project team, and will perform "internal" or project reviews of all project documents to ensure that the above requirements have been satisfied. In addition, peer reviewers are selected to perform an "outside" review of the documents. A peer reviewer is selected based upon the following criteria:

- The reviewer must be independent of the project. The reviewer must be sufficiently informed regarding the project, but should not be making decisions which determine or affect the course of the project.
- The reviewer must be a person knowledgeable in the specific area of work, preferably a senior technical associate. Technical reviewers will be part of the IT organization.

At the conclusion of a technical or peer review, the reviewer(s) will prepare written review comments, sign off on the Discipline Sign-Off Review form (Figure 1) and forward it to the Program Manager, PM, and QAO; a copy of these review documents will also be placed in the project files. Technical review comments will be responded to in writing by the preparer, incorporated into the document as appropriate, and submitted with the document to the USACE.



Client Name: U.S. Army Engineer District, Nashville; CELRN-EP-R-M

Project Description: Site Investigation of Acid Areas, Former Plum Brook Ordnance Works, Sandusky, Ohio

Contract Number: 

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Delivery Order Number: 

0	0	3	0
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Project Number: 

7	7	3	2	0	6
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Task / Phase Number: 

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<u>Document Type</u>	<u>Identify specific section or segment covered by this checklist</u>	<u>Document Origin</u>
<input type="checkbox"/> Technical / Cost Proposal	_____	<input type="checkbox"/> Originator Developed
<input type="checkbox"/> RFP	_____	<input type="checkbox"/> Edited Standard
<input type="checkbox"/> Contract / Subcontract	_____	<input type="checkbox"/> Client Furnished
<input type="checkbox"/> SAP, SSAP, CDAP, or QAPP	_____	
<input type="checkbox"/> SHP or SSHP	_____	
<input type="checkbox"/> _____ Report	_____	<u>Document Status</u>
<input type="checkbox"/> Risk Assessment / Evaluation	_____	<input type="checkbox"/> Preliminary
<input type="checkbox"/> Specifications & Plans	_____	<input type="checkbox"/> Internal Draft
<input type="checkbox"/> Design Calculations	_____	<input type="checkbox"/> Draft
<input type="checkbox"/> Tables	_____	<input type="checkbox"/> Draft Final
<input type="checkbox"/> Drawings / Figures	_____	<input type="checkbox"/> Final
<input type="checkbox"/> Other: _____	_____	<input type="checkbox"/> Other: _____

	<u>Required Person</u>	<u>Signature</u>	<u>Date</u>
Originator	_____	_____	_____
Checker	_____	_____	_____
Backchecker	_____	_____	_____
Updater	_____	_____	_____
Rechecker	_____	_____	_____
Technical Reviewer	_____	_____	_____
Technical Reviewer	_____	_____	_____
Technical Reviewer	_____	_____	_____
Technical Reviewer	_____	_____	_____
Quality Assurance Officer	T. Smith	_____	_____
Project Manager	M. Spangberg	_____	_____
Program Manager	D. Burton	_____	_____

FIGURE 1

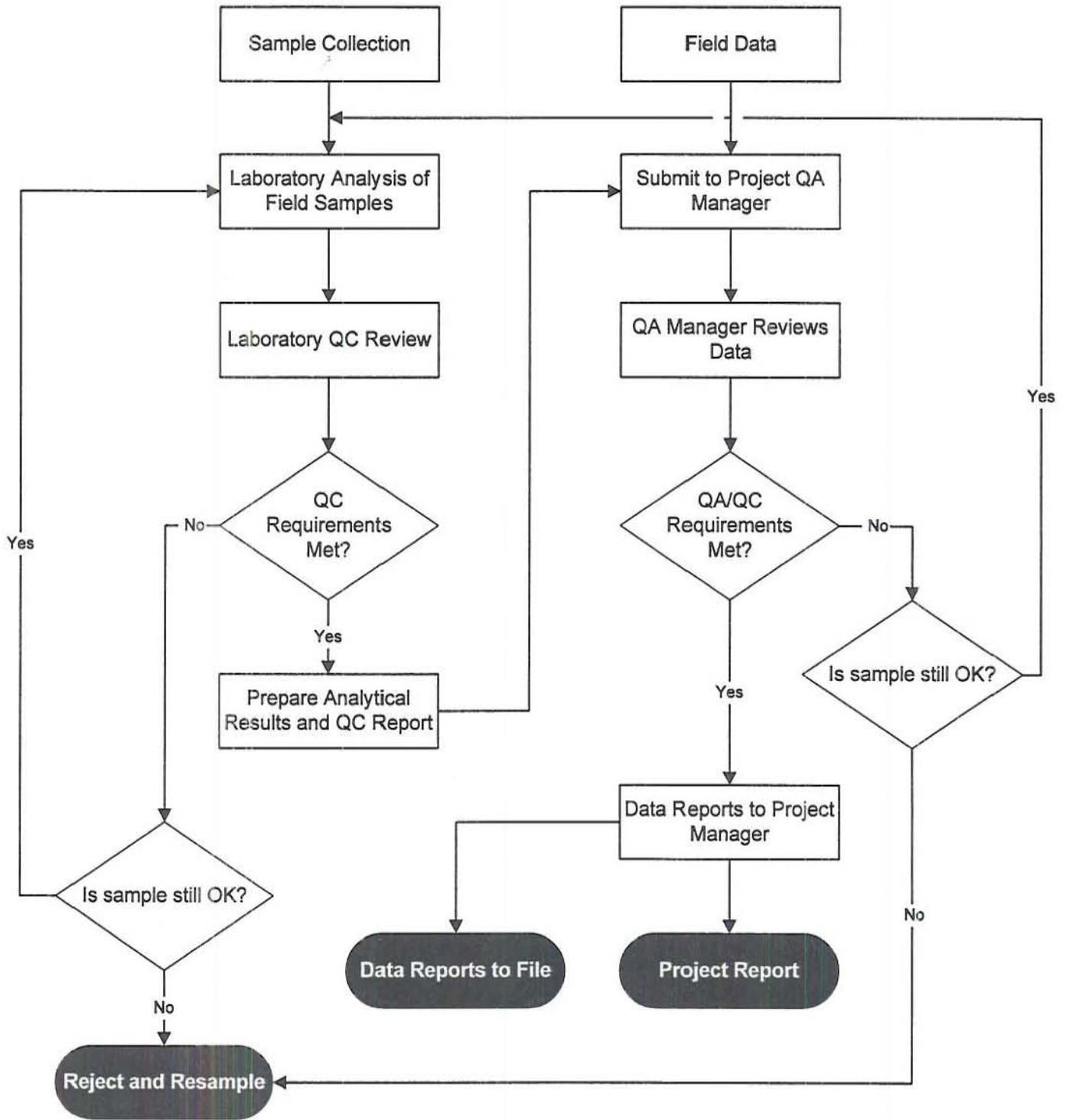


FIGURE 2

DATA REVIEW FLOW CHART

SITE INVESTIGATION OF ACID AREAS  
FORMER PLUM BROOK ORDNANCE WORKS

**Table 1**

**Preparation and Review Process for Required Project Deliverables  
Site Investigation of Acid Areas, Former Plum Brook Ordnance Works  
Sandusky, Ohio**

Submittal Description/ Title	Document Preparation and Review Process								
	Principal Author(s)	Grade	Discipline	Peer Review	Grade	Discipline	Project Review	Grade	Discipline
Site-Specific Sampling and Analysis Plan (SSAP)	George Yu Dennis Seymore Kimberly Arrant	E07 E06 E08	Hydrogeologist Geologist Chemist	Belinda Price	E12	Hydrogeologist	Mikael Spangberg Tony Smith Steve Muffler	E11 E08 E08	Engineer QA Officer Geologist
Site-Specific Safety and Health Plan (SSHP)	Melissa Smith James Bolden	E10 E10	H&S Professional H&S Professional	Harry Pullum	E13	Indus. Hygienist	Mikael Spangberg Tony Smith Steve Muffler	E11 E08 E08	Engineer QA Officer Geologist
Site Investigation Report (Draft and Final)	George Yu Dennis Seymore Kimberly Arrant	E07 E06 E08	Hydrogeologist Geologist Chemist	Belinda Price Adrian Gonzalez	E12 E05	Hydrogeologist Risk Assessor	Mikael Spangberg Tony Smith Steve Muffler	E11 E08 E08	Engineer QA Officer Geologist

permits, training, schedule, equipment rentals, supplies, subcontractors, have been accomplished for execution of the field effort in an efficient and effective manner. The IT PM and QAO must approve the project preparation prior to mobilization.

Changes or variances to the SSHP, SSAP, SAP, SHP, or QAPP may be initiated either in the office or in the field as may be necessary. All variances will be noted on the Field Activity Daily Log (FADL) and will be formally recorded on the Variance Log. Variances will be approved by the IT QAO and the IT PM prior to implementation of the change. Variances that will affect the project scope, cost, or schedule will be submitted to the USACE for approval prior to implementation.

Nonconforming equipment, items, activities, conditions, and unusual incidents that could affect compliance with project requirements will be identified, controlled, and reported in a timely manner. A nonconformance is defined as a malfunction, failure, deficiency, or deviation that renders the quality of any item unacceptable or indeterminate. The originator (any IT employee) of a nonconformance report will describe the finding on the Nonconformance Report provided for this purpose and will notify the IT PM and QAO. Each nonconformance will be reviewed and a disposition will be issued for the item, activity, or condition. The disposition of a nonconformance will be documented and approved by the IT organization responsible for issuing the nonconformance. The QAO will concur with the disposition of the nonconformance prior to closure of the Nonconformance Report.

In addition, the IT PM will notify the USACE PM within 48 hours of significant nonconformances that could impact the project schedule or scope of work and will indicate the corrective action taken or planned.

### **SUBCONTRACTOR QA/QC REVIEW**

IT has assigned personnel to monitor and review work performed by subcontractors in conjunction with this investigation. Mr. Mikael L. Spangberg will serve as the principal point-of-contact (POC).

The selection of qualified subcontractors will be accomplished in accordance with IT procurement and quality assurance (QA) procedures. Subcontractors such as drillers,

geophysical specialists, surveyors, and environmental monitoring specialists, must satisfy predefined qualifications developed by the PM and IT that are defined in the procurement bid packages. Each subcontractor bid submittal is reviewed by technical personnel, purchasing, and QA personnel to verify that the bidders are technically qualified and can satisfy the project objectives. Before starting work, IT will perform a quality check to ensure that the subcontractor(s) has fulfilled the procurement requirements necessary to begin activities. Subcontractors involved in environmental measurements will be monitored by the IT Field Coordinator to verify the use of calibrated equipment and qualified operators.

### **CUSTOMER INVOLVEMENT**

Customer involvement will be ongoing throughout the duration of this investigation, and IT personnel will be available as needed for question, consultation, etc. Project personnel may be reached at the following phone numbers:

Mr. Don C. Burton	(423) 690-3211 Ext. 2337	Fax (423) 690-4652
Mr. Mikael L. Spangberg	(423) 690-3211 Ext. 2378	Fax (423) 690-4652
Mr. Steven Muffler	(423) 690-3211 Ext. 2386	Fax (423) 690-4652
Mr. Tony Smith	(423) 690-3211 Ext. 2266	Fax (423) 690-4652
Ms. Melissa G. Smith	(423) 690-3211 Ext. 4131	Fax (423) 690-4652

Each work plan, report, or other deliverable will be submitted to the USACE Nashville for review and comment. All review comments will be addressed and incorporated into the final submittals.

### **DOCUMENTATION OF PROJECT DECISIONS AND RECORDS MANAGEMENT**

The IT Project Records Clerk is responsible for maintaining control and retention for project-related records. Record control includes receipt from external and internal sources, transmittal, transfer to storage, and indication of record status. Retention includes receipt at storage areas, indexing and filing, storage and maintenance, and retrieval. IT will maintain the project repositories at 312 Directors Drive in Knoxville, Tennessee, for all project records, including correspondence. Records will be controlled and retained, as appropriate, in the office central files or laboratory files. The Project Records Clerk will assign control numbers to all outgoing documents and is responsible for properly filing the controlled records (except for those related to accounting, purchasing, and drafting, which are retained in the respective department files).

IT will also provide the USACE Nashville District with a copy of all telephone memos, written correspondence, and meeting minutes regarding information related to the project within ten (10) days of the event. Copies of all records will be retained by IT for a minimum of seven (7) years after the end of the contract period. In addition, project records deemed to be of importance by the USACE will be turned over to the USACE at the time of project close-out.

### **PROJECT CLOSE-OUT**

At the completion of this investigation, a project close-out meeting will be conducted. This will be at a time and place to be determined by Nashville District personnel, and may take the form of a teleconference. The purpose of this meeting will be to exchange feedback, discuss lessons learned, and conduct a final product verification.

QUALITY ASSURANCE (QA) PLAN FOR  
THE SITE INVESTIGATION OF ACID AREAS  
AT THE FORMER PLUM BROOK ORDNANCE WORKS  
SANDUSKY, OHIO

1. This QA Plan covers the work to be performed under Delivery Order No. 0030 with IT Corporation under Indefinite Delivery Contract No. DACA62-94-D-0030. The award was made on 29 September 1997 with year-end funds.

2. Reference the Final Quality Control Plan, dated 21 October 1997, that was prepared by IT Corporation. A draft of this document was reviewed by both CELRN-EP-R-M and CELRN-EP-R-D. Comments were incorporated by the A-E.

3. CELRN-EP-R is doing this project under the DERP FUDS Program.

4. The CELRN-EP-R Project Team is as follows:

Linda Ingram, Technical Manager, EP-R-M, GS 12  
Doug Mullendore, Chemical Engineer and POC for EP-R-D, GS 12  
Jim Beaujon, Geologist, EP-R-D, GS 11  
Becky Terry, Chemist, EP-R-D, GS 12  
Other personnel will be used as needed.

5. These items listed below are the general procedures that were/will be followed in-house to obtain a quality product.

a. Prior to preparation of the Scope of Work, CELRN-EP-R-D reviewed any existing documents that contained information about the Acid Areas and discussed with IT Corporation as needed.

b. CELRN-EP-R-D prepared the Scope of Work. It was reviewed by an in-house Technical Review Team and by the HTRW-CX. All of these comments were incorporated/resolved. Documentation of this QC process is on file in CELRN-EP-R-M.

c. All documents as required will be furnished to the HTRW-CX for review since this project is a Category "B" (DERP FUDS project in the SI Phase).

d. Draft Work Plans will be reviewed by CELRN-EP-R-D, NASA Plum Brook Station, and Ohio EPA. They will be furnished to CELRH and the HTRW-CX for information only. The review will be handled by CELRN-EP-R-M. The comments will be discussed

and resolved with the reviewers as needed. All comments will be responded to in the Final Work Plans.

e. QA on analytical work will be performed by the U.S. Army Corps of Engineers, Northwest Division Laboratory.

f. CELRN-EP-R-D personnel will be present for field work unless it is determined that it is not necessary at all times.

g. The Draft Reports will be submitted for review by CELRN-EP-R-D, CELRH, the HTRW-CX, NASA Plum Brook Station, and Ohio EPA. The review will be handled by CELRN-EP-R-M. All comments will be addressed in the Final Report.

h. This project will be included in the Plum Brook Fact Sheet that is prepared each month. Also, the project will be reviewed in the Monthly ERC Project Meetings between EP-R-M and EP-R-D. The LRH Project Manager, Dianne Folk, will be kept informed and will be furnished a copy of all submittals. The role of LRH reviews is intended to be as a Project Manager function rather than a technical function.

6. Information on schedule and budget can be found in the Monthly Fact Sheet.

7. At the completion of the project, a final project verification will occur.

Encl. as stated

Linda S. Ingram  
Linda S. Ingram  
Technical Manager, CELRN-EP-R-M

24 Oct 1997  
Date

John W. Hall  
John W. Hall  
Chief, CELRN-EP-R-M

10/27/97  
Date