

Capitol City Plume
Downtown Alliance, EPA, and ADEM Future Deliverables
September 30, 2015

Alliance submissions to ADEM per Cleanup Agreement

Deliverable	Due
Community Involvement and Outreach Plan	60 days after execution of Agreement (November 29, 2015)
Supplemental Environmental Investigation Work Plan	120 days after execution of Agreement (January 28, 2016)
Supplemental Environmental Investigation Report	9 months after approval of EI Work Plan
Risk Assessment/Alternatives Analysis Report	120 days after concurrence with EI Report
Remedial Action Plan (may be combined with Risk Assessment/AA Report)	60 days after concurrence with Risk Assessment/AA Report. If the RA Plan is combined with the Risk Assessment/AA Report as a single submittal, the combined document shall be submitted within 180 days after concurrence with the EI Report
Remedial Action Report	Within 60 days of completing implementation of remedial action
Remedial Action Progress Report (if warranted)	To be submitted according to the schedule described in the Remedial Action Plan, as approved by ADEM and as required in Paragraph VIII.I.
Final Report Upon Completion	Within 60 days of attaining performance standards and completing all requirements of the Remedial Action Plan

ADEM Submissions to Alliance per Cleanup Agreement

Deliverable	Due
Notification of all planned media releases or public meetings	At least 7 days prior to event, unless emergency situation
Invoice for actual oversight costs	Within 90 days of the end of each quarterly anniversary date of Agreement
Annual cost-estimate for ADEM oversight	July 1 of previous fiscal year
Notification of any significant exceedance of cost-estimate	Within 30 days of becoming aware that the exceedance will occur

Alliance Submissions to EPA per Past Cost Agreement

Deliverable	Due
1 st \$866,666.67 payment	30 days after signing (October 30, 2015)
2 nd \$866,666.67 payment plus interest	Within 30 days of the anniversary date of the 1 st payment
Final \$866,666.67 payment plus interest	Within 30 days of the anniversary date of the 2 nd payment

ADEM Submissions to EPA per MOA

Deliverable	Due
Copy of signed Cleanup Agreement	Upon signing
Management briefing on progress in investigation, assessment, and response actions	Annually
Report on any difficulties in meeting the conditions of the MOA	Semi-annually, as necessary
Brief on proposed remedial action	Before and after soliciting public comment
Certification to EPA and community that remedy has been successfully implemented	After approval of Remedial Action Report
Response Action completion documentation	Upon completion of the Response Action

EPA Actions per MOA

Action	Trigger
Deferral of the Site	Execution of MOA
Deferral Completion Inquiry	ADEM certification of remedy implementation
De-proposal from NPL	EPA confirmation of Remedial Action completion