

Table 7-1
Master Plan (Updated as of 13 January 2015)
Country mark Cooperative, Inc.
Mt. Vernon, Indiana

ID	Name	Duration (business days) ¹	Start	Finish	"X" Shown if Completed	Predecessors	Notes
1	Effective date of AOC	0 day		8/2/2013			Date when signed by EPA
2	AOC V.9 - Designate a Project Manager and notify EPA	11	8/2/2013	8/16/2013	X	1	
3	AOC VI.11.a - Submit Current Conditions Report (CCR)						Within 120 days of the AOC's effective date
	3a - Project kick-off conference call	57	8/16/2013	11/7/2013	X	2	Delayed by a month as a result of the government shutdown between October 1 and 16, 2013.
	3b - Prepare Current Conditions Report	132	8/16/2013	2/17/2014	X	3a	Because of the 2013 government shutdown that delayed the project kick-off conference call, a 30-day extension approval was received on December 12, 2013.
	3c - EPA review and comments	72	2/17/2014	5/29/2014	X	3b	
	3c - Response to EPA's comments	72	5/29/2014	9/10/2014	X	3c, 5a1	
	3d - EPA's consultants' review of the CCR	30	9/26/2014	11/10/2014	X	5a4	
4	AOC VI.11.a - Submit Corrective Action Facility Master Plan						Within 120 days of the AOC's effective date and quarterly thereafter
	4a - Prepare and Submit Corrective Action Facility Master Plan	101	9/30/2013	2/17/2014	X	3a+30	30-day extension approval received on December 12, 2013 for the CCR; per the AOC, the initial Master Plan was submitted with the CCR.
	4b - EPA review and approval	72	2/17/2014	5/29/2014	X	4a	
	4c - Update Corrective Action Facility Master Plan - 1st Quarterly Update						To be done after the Master Plan is approved by EPA, assumes quarterly from that date
	4c1 - 1st Quarterly Update	9	10/2/2014	10/15/2014	X	4b+90	
	4c2 - EPA review and approval	75	10/15/2014	2/4/2015		4c1	
	4d - Update Corrective Action Facility Master Plan - Next quarterly updates						Quarterly, to the end of the project
	4d1 - Quarterly update	20	2/6/2015	3/6/2015		4c1+90	
	4d2 - EPA review and approval	75	3/6/2015	6/22/2015		4d1	
5	AOC VI.11.b - Perform RFI and Submit RFI Report						Within 240 days of the AOC's effective date or the deadline set forth in the approved RFI Work Plan.
	5a - Follow-up to CCR and PCSM Development						
	5a1 - Meet with EPA to discuss Site	47	5/29/2014	8/5/2014	X	3b	
	5a2 - Prepare notes of 8/5/14 EPA meeting	13	8/5/2014	8/22/2014	X	5a1	
	5a3 - Receive new EPA's document (August 2014) on soil background calculations	0	8/21/2014	8/21/2014	X		
	5a4 - Discuss background soil calculations	25	8/21/2014	9/26/2014	X	5a3	
	5a5 - Prepare 9/26/15 conference call notes	14	9/26/2014	10/17/2014	X	5a4	
	5a6 - Received Final Technical Review Comments for CCR	0	11/26/2014	11/26/2014	X	5a5	
	5a7 - Perform background soil calculations and prepare and submit background report	74	10/17/2014	2/5/2015	X	5a6	
	5a8 - EPA meeting to discuss RFI WP and PCSM	0	1/20/2015	1/20/2015	X	5a7	
	5a9 - Prepare notes of 1/20/15 EPA meeting	15	1/21/2015	2/11/2015	X	5a8	
	5a10 - PCSM presentation call with EPA	0	3/24/2015	3/24/2015	X	5a9	
	5b - South Transect				X		
	5b1 - Prepare South Transect Work Plan and submit it to EPA	15	3/26/2015	4/16/2015	X	5a10	
	5b2 - Receive EPA's approval of the South Transect Work Plan	5	4/16/2015	4/23/2015	X	5b1	
	5b3 - On-site subsurface clearance	2	4/21/2015	4/22/2015	X	5b2	
	5b4 - On-site APS	5	4/27/2015	5/1/2015	X	5b3	
	5b5 - Laboratory analysis of samples	0	5/4/2015	5/4/2015	NA	5b4	No groundwater samples were collected
	5b6 - Data reduction/evaluation and revise PCSM	17	5/1/2015	5/27/2015	X	5b5	
	5b7 - Presentation of transect results and revised PCSM to EPA	0	5/28/2015	5/28/2015	X	5b6	

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	5c - RFI Work Plan						
	5c1 - EPA review and response to background soil calculations report	101	2/5/2015	6/30/2015	X	5a7	
	5c2 - Prepare and submit response to EPA comments on background soil calculations report	8	6/30/2015	7/13/2015	X	5c1	
	5c2 - Prepare and submit RFI WP outline	14	5/28/2015	6/17/2015	X	5b7	Do the outline w/o the South Transect data
	5c3 - EPA review and response to RFI WP outline	30	6/17/2015	7/30/2015		5c2	
	5c4 - EPA review and response to revised PCSM	44	5/28/2015	7/30/2015		5a10	
	5c5 - Prepare and submit RFI Work Plan	60	7/31/2015	10/27/2015		5c3, 5c4	Incorporate EPA comments on revised PCSM
	5c6- EPA review and approval of RFI Work Plan	60	10/28/2015	1/27/2016		5c5	
	5d - Collect additional samples						
	5d1 - Prep for and install borings and monitoring wells; collect soil, groundwater, surface water, and sediment samples	45	2/1/2016	4/5/2016		5c6	
	5d2 - Laboratory analysis of samples	21	4/5/2016	5/4/2016		5d1	
	5d3 - Preparation of tables, figures, exhibits, maps	30	5/4/2016	6/16/2016		5d2	
	5e - Obtain data from references	10	6/16/2016	6/30/2016		5d3	
	5f - Perform risk assessment	30	6/30/2016	8/11/2016		5e	
	5g - Prepare draft RFI Report	60	6/30/2016	9/23/2016		5d, 5e, 5f	Originally due 7/28/2014; an extension of 90 days, or the date agreed to in the approved RFI Work Plan, was granted on 4/23/2014. Discussions to define the scope of the RFI Work Plan were performed twice (5a1 and 5a8). A South Transect Work Plan was prepared, approved by EPA, implemented in April-May 2015; the results were presented to EPA in a 5/28/15 conference call and a revised RFI WP outline provided on 6/17/15 (5b).
	5h - EPA review and approval of RFI Report	60	9/23/2016	12/20/2016		5g	
	5i - Collect additional samples (Quarter 2)						Upon receipt of all lab analytical results
	5i1 - Collect groundwater and soil gas samples	14	8/2/2016	8/22/2016		end of 5d2+90	
	5i2 - Laboratory analysis of samples	30	8/22/2016	10/4/2016		5i1	
	5i3 - Preparation of tables, figures, exhibits, maps	30	10/4/2016	11/17/2016		5i2	
	5i4 - Perform risk assessment	30	11/17/2016	12/29/2016		5i3	
	5i5 - Prepare Quarter 2 Sampling Report to EPA	30	12/29/2016	2/9/2017		t84	
	5i6 - EPA review and approval of Quarter 2 Sampling Report	60	2/9/2017	5/4/2017		5i6	
6	AOC VI.11.c - Submit risk assessment reports						Link to each report submitted to EPA
7	AOC VI.12 - Propose and Implement Interim Measures, if Needed (cover, land use restrictions)						Assumes interim measures to prevent exposure to soils; submit with RFI report
	7a - Interim measures proposal						
	7a1 - Prepare interim measures proposal	30	8/11/2016	9/23/2016		5g	
	7a2 - EPA review and approval	60	9/23/2016	12/20/2016		7a1	
	7b - Interim measures implementation						Upon receipt of EPA's approval
	7b1 - Implement interim measures	30	12/20/2016	1/31/2017		7a2	
	7b2 - Prepare draft interim measures report	30	1/31/2017	3/15/2017		7b1	
	7b3 - EPA review and approval	60	3/15/2017	6/8/2017		7b2	
8	AOC VI.13.a - Submit EI Report for Current Human Exposures under Control						Upon approval of interim measures implementation report; due within 1 year of the AOC's effective date.

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	8a - Prepare draft EI Report for Human Exposures	30	6/8/2017	7/21/2017		7b3	On April 13, 2015, CountryMark proposed to tie the schedule for this activity to a due date established in the approved RFI Work Plan. Work is ongoing, but the RFI Work Plan is not expected to be approved until the end of 2015, and no investigation can be performed before its approval (other than the South Transect, whose Work Plan will be submitted on 4/15/15).
	8b - EPA review and approval	60	7/21/2017	10/17/2017		8a	
9	AOC VI.14.c - Quarterly Groundwater Sampling						
	9a - Quarter 3 sample collection	90	12/9/2016	4/17/2017		5i+90	
	9b - Quarter 4 sample collection	90	4/17/2017	8/23/2017		9a+90	
	9c - Quarter 5 sample collection	90	8/23/2017	1/4/2018		9b+90	
	9d - Quarter 6 sample collection	90	1/4/2018	5/14/2018		9c+90	
	9e - Quarter 7 sample collection	90	5/14/2018	9/20/2018		9d+90	
	9f - Quarter 8 sample collection	90	9/20/2018	2/1/2019		9e+90	
10	AOC 13.b - Submit EI Report for Migration of Contaminated Groundwater under Control						Within 3 years of the AOC's effective date
	10a - Prepare draft EI Report for Human Exposures	60	2/1/2019	4/29/2019		9f	Delayed by the delay on the preparation of the RFI Work Plan.
	10b - EPA review and approval	180	4/29/2019	1/16/2020		10a	
11	AOC 15 - Submit CMS						Within 1 year after approval of the final RFI report
	11a - Prepare site description, issues, and goals	30	12/20/2016	1/31/2017		5h	
	11b - Define potential corrective actions to meet the goals and obtain funding	60	9/23/2016	12/16/2016		5g	
	11c - Perform bench-scale and/or pilot test and prepare report	150	12/20/2016	7/21/2017		5h, 11b	Whichever of the predecessors happens last
	11d - Prepare conceptual design of each corrective action (area to undergo corrective action, infrastructure, vendor estimates, waste disposal, etc.)	60	6/9/2017	9/5/2017		11c-30	
	11e - Prepare figures, tables, maps, etc., for each corrective action	20	9/5/2017	10/3/2017		11d	
	11f - Prepare risk assessment	30	9/5/2017	10/18/2017		11d	Need input from 11e also
	11g - Evaluate each alternative against standard criteria	30	10/18/2017	12/1/2017		11f	
	11h - Prepare and submit draft CMS report	100	7/21/2017	12/14/2017		11c	
	11i - EPA review and approval	60	12/14/2017	3/14/2018		11h	
12	AOC VI.16 - Propose Risk Screening Criteria, Cleanup Objectives, and Points of Compliance						Link to each report submitted to EPA
13	15/19 - Implement the final Corrective Measures selected by EPA						Final Remedy Construction Completion Report included in AOC VI.20.f
	13a - Engineering design	90	3/14/2018	7/20/2018		11i	
	13b - Planning, documentation (health and safety plan, materials management plan, stormwater pollution prevention control plan), permits	60	7/20/2018	10/16/2018		13a	
	13c - Contractor and equipment procurement	60	7/20/2018	10/16/2018		13a	
	13d - Corrective measures installation	60	10/16/2018	1/14/2019		13b, 13c	Whichever happens last
	13e - Corrective measures equipment startup	35	1/14/2019	3/6/2019		13d	
	13f - Corrective measures equipment operation	500	3/6/2019	3/3/2021		13e	
	13g - Corrective measures monitoring	560	3/6/2019	5/26/2021		13e	Assumes 60 days beyond operation to collect, analyze, and evaluate results of additional samples
	13h1 - Corrective measures completion report preparation	30	5/26/2021	7/9/2021		13e	No deadline in the AOC
	13h2 - EPA review and approval	60	7/9/2021	10/4/2021		13h1	
14	AOC VI.20.a - Establish a publicly accessible document repository						Within 120 days of the AOC's effective date
	14a - Arrange for space and access to the public	60	8/2/2013	10/29/2013	X	1	
	14b - Gather and copy documents	60	8/2/2013	10/29/2013	X	1	
	14c - Send documents to repository and confirm receipt and availability	60	10/29/2013	1/28/2014	X	14b	

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15	AOC VI.20.b - Submit a Community Involvement Plan						30 days from EPA's notification that public involvement activities will be started, after sufficient data has been gathered; assume it is started sometime after approval of the RFI, to have time to decide what to do
	15a - Prepare draft community involvement plan	30	1/19/2017	3/3/2017		5h + 30 d	
	15b - EPA review and approval	60	3/3/2017	5/26/2017		15a	
16	AOC VI.20.c - Submit Quarterly Progress Reports	7					Quarterly, to the end of the project
17	AOC VI.20.d - Establish a Web Portal						Within 90 days of the AOC's effective date
	17a - Define requirements	30	8/2/2013	9/16/2013	X		
	17b - Establish web portal	60	9/16/2013	12/12/2013	X		
	17c - Maintain web portal	2555	8/2/2013	7/31/2020			Assume 7 years, to the 2020 RCRA Corrective Action Goal
18	AOC VI.20.e - Attend semi-annual meetings/conference calls	1	8/4/2014	8/5/2014	X		Semi-annually, to the end of the project. The semi-annual conference call was cancelled because the review of the CCR was not ready. A meeting to discuss the CCR was held on 8/5/2014. Another meeting to discuss the RFI Work Plan Outline and PCSM was completed on 1/20/15. Additional discussions were held on 3/24/15.
19	AOC VI.20.f - Submit Final Remedy Construction Completion Report						Within 60 days of EPA's Final Decision on the corrective measures or of agreement on submittal based on schedule in the CSM; assume 335 days (275 in task 13 + 60 days)
	19a - Prepare final remedy construction completion report	37	3/6/2019	4/26/2019		13e	
	19b - EPA review and approval	60	4/26/2019	7/23/2019		19a	
20	AOC VI.20.g - Include an operations, monitoring, and maintenance (OMM) plan in the Final Remedy Construction Completion Report, if necessary						Within 60 days of EPA's Final Decision on the corrective measures or of agreement on submittal based on schedule in the CSM; assume 335 days (275 in task 13 + 60 days)
	20a - Prepare draft OMM plan	37	3/6/2019	4/26/2019		13e	
	20b - EPA review and approval	60	4/26/2019	7/23/2019		20b	
21	AOC VI.20.i - Notify EPA prior to each separate phase of field work	1					At least 14 days before start of each separate phase of field work (3a, 5a, 5b, 7b1, 9a1, 9b1, 9c1, 9d1, 9e1, 9f1, 11c, 13d, 13e). Link it to each of the tasks listed
22	AOC VII.23 Access						For off-site activities
	22a - Procure access agreements to off-site properties	30	6/16/2016	7/28/2016		5b3	From the time off-site access is determined to be required; assume at the end of task 5d3
	22b - Notify EPA if access is not obtained	14	7/28/2016	8/17/2016		22a	
23	AOC VIII.25 - Estimated Cost of the Work						Within 30 days from submission of the CMS
	23a1 - AOC VIII.25.a - Submit an estimate of the cost of hiring a third party to perform the work in the CMS	30	12/14/2017	1/30/2018		11h	
	23a2 - EPA review and approval	60	1/30/2018	4/25/2018		23a1	
	23b1 - AOC VIII.25.b - Review the cost estimate annually					23a2+330	Annual, to the end of the project, within 30 days of close of client's fiscal year; begin after the cost estimate is approved
	23b2 - EPA review and approval	60				23b1	
	23c - AOC VIII.25.c - Need for revised cost estimate						If needed; assume it's needed 6 months after startup of the system; use 20 days, which is the case of the client's becoming aware of the need for cost estimate change
	23c1 - Notify of the need for revised cost estimate	10	3/6/2019	3/20/2019		13e+6 months	

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	23c2 - Prepare revised cost estimate and submit to client for review	16	3/6/2019	3/28/2019		13e	
	23c3 - EPA review and approval	60	3/28/2019	6/21/2019		23c2	
24	AOC VIII.26 - Assurances of Financial Responsibility for Completing the Work						Option is unknown.
	24a - AOC VIII.26.a - Establish financial assurance						
	24a1 - If approval of cost estimate is received within 30 days after close of fiscal year					23a2	Option 1 (within 60 days after approval of the cost estimate), annually, to the end of the project
	24a2 - If approval of cost estimate is not received within 30 days after close of fiscal year						Option 2 (within 90 days after close of client's fiscal year), annually, to the end of the project
	24b - AOC VIII.26.b - Update financial instrument or financial test demonstration						Within 90 days after close of client's fiscal year, annually, to the end of the project
	24c - AOC VIII.26.d - Submit financial assurance documents for EPA's review in draft form						At least 30 days before they are due to be filed
	24d - AOC VIII.26.e - Submit all original executed and/or otherwise finalized instruments to EPA's Regional Comptroller						Within 30 days after date of execution or finalization, annually, to the end of the project
	24e - AOC VIII.26.j - Inadequate financial assurance mechanism(s)						
	24e1 - Notify of inadequacy of financial assurance mechanism(s)						Within 10 days of becoming aware of inadequacy
	24e2 - Establish and maintain adequate financial assurance mechanism(s)						Within 90 days of receipt of EPA's notification or within 90 days of becoming aware of inadequacy
	24e3 - Submit draft of financial assurance documents to EPA for review						At least 30 days before they are due to be filed
25	AOC VIII.27 - Modification of Amount and/or Form of Performance Guarantee						May or may not occur. Dates are unknown.
	25a - AOC VIII.27.a - Reduction of amount of financial assurance						
	25a1 - Submit a written proposal to EPA for approval with the annual revised cost estimate						With the annual cost estimate
	25a2 - Reduce the amount of financial assurance upon receipt of EPA's approval						Deadline not specified
	25b - AOC VIII.27.b - Change of form of financial assurance						Within 10 days after receiving written approval
	25b1 - Submit a written proposal to EPA for approval with the annual revised cost estimate						If client decides to change the form of financial assurance
	25b2 - Execute and/or otherwise finalize all instruments or other documents after receipt of EPA's approval						Within 10 days after receiving written approval
26	AOC VIII.28 - Performance Failure						May or may not occur. Dates are unknown.
	26a - AOC VIII.28.a - Period to remedy the circumstances giving rise to the issuance of a notice of performance failure						20 days after receipt of a notice of failure to perform
27	AOC IX.29 - Record Preservation						Dates are unknown.
	27a - Period for record preservation						At least six years after the Order terminates
	27b - Time for written notification before destroying records						90 days before destroying any records
	27c - Period to enter into an agreement with agent, consultant, or contractor to provide copies of all documents to CountryMark						Within 30 days of retaining any new agent, consultant, or contractor
Notes:							
A red font indicates changes this quarter.							
Dates for other activities changed IF their predecessor was one of the activities with duration or Start/Finish dates in red font.							
¹ In accordance with Michelle Kaysen's e-mail of August 21, 2013, the durations in the AOC are business days, not calendar days.							