

## Timeline – Corrective Action Milestones

**November 2002** – Vernay submits current conditions report, which describes property and any known contamination. *Submitted to EPA Nov. 2002.*

**Winter 2002 – Summer 2004** – Vernay conducts phase one facility investigation to define nature and extent of hazardous waste at facility, identify any risks to people that need to be addressed in the short-term, develop a computer model to map ground water and contaminant flow. *Submitted to EPA June, 2004; approved by EPA Oct., 2004.*

**April 2003** – Vernay conducts first of quarterly ground water monitoring and submits results to EPA. Quarterly sampling continues to date.

**Summer 2004 – Dec. 2004** – Vernay conducts phase two facility investigation. This study is designed to: 1) better define soil contamination at facility; 2) assess how contamination moves in ground water; and 3) assess how people and plants and animals can be exposed to contamination. *Phase two report submitted to EPA Dec. 2004; approved by EPA Dec., 2005.*

**July 2004** – Vernay submits environmental indicator report for human health, called a CA725 report for short, which documents that immediate threats to human health are under control. *Final report submitted to EPA July, 2004; approved by EPA Sept. 2004.*

**Mid-June 2006 --** Vernay must submit environmental indicator report for ground water, called a CA750 report, which must document that contaminated ground water has stopped moving away from the site. *Report Submitted to EPA April 2006; currently under review by EPA.*

**180 Days from EPA Approval of CA750 Report --** Vernay will propose an option(s) for addressing contamination that poses unacceptable risks at the facility or as a result of operations. This is called the final corrective measures proposal.

**2008 (tentative)** – EPA prepares a statement of basis which proposes EPA's recommendation for addressing contamination. EPA may take Vernay's proposed option, or develop another. EPA holds a 30-day public comment period and a public hearing. EPA prepares a final decision document which describes how contamination will be addressed.

**Upon Notice by EPA** – Vernay designs and implements final corrective measures defined in the decision document.