

Comprehensive Legacy Management and Institutional Control Plan (S03496-12.0)
Revision 12, January 2019
Variances for Calendar Year 2020

Variance Number	Variance Title	Significant?^a (Y/N)	Affected Volume/Attachment and Section	Variance Date	Regulatory Approval Date
2020-01	Document Revision	Y	Volume I, Section 1.1, Purpose and Organization of the LMICP and Volume II, Section 1.6, Updates to the Institutional Control Plan	9/18/2019	
2020-02	Prohibited Items	Y	Volume II, Figure 2, Fernald Preserve Prohibited Activities and Items.	9/18/2019	
2020-03	Inspection Timing	Y	Vol II, Section 3.2, Fernald Preserve Inspections and PCCIP, Section 6.2.1.1	9/18/2019	
2020-04	Lidar	Y	PCCIP, Section 3.3 OSDF As-Built	9/18/2019	
2020-05	Leachate Volume	Y	GWLMP, Section 3.2.2 Leachate Monitoring Compliance Strategy	9/18/2019	
2020-06	Accumulation Rate	Y	GWLMP, Section 4.4.2.1, Flow Monitoring in the LCS and LDS	9/18/2019	
2020-07	Contact List	N	Community Involvement Plan, Appendix A, Contact List	9/18/2019	

^a Per the *Fernald Preserve Quality Assurance Project Plan* (DOE 2014): A **significant variance** is required when activities change the scope of the project and that change must be reviewed by the regulatory agencies. An **informational variance** is used for changes such as providing clarification, incorporating additional information, correcting errors or documenting resampling efforts.

Variance

Variance number: 2020-01 **Significant:** Yes No
Document number: LMS/FER/S04396-12.0 **Page:** 1 of 1
Document title: Fernald Preserve Comprehensive Legacy Management and Institutional Controls Plan **Date:** 9/18/2019

Variance

Requirements: Per Volume I, Section 1.1, Purpose and Organization of the LMICP (Page 3) and Volume II, Section 1.6, Updates to the Institutional Control Plan (Page 10):

"The future LMICP schedule will be as follows:

- Each June, the annual Site Environmental Report will be submitted.
- Each September, an annual review of the LMICP will be submitted. It will identify updates as necessary.
- Each January, the document will be finalized to correspond with the monitoring and reporting schedule."

Variance: "The future LMICP schedule will be as follows:

- Each June, the annual Site Environmental Report will be submitted.
- Each September, an annual review of the LMICP will be ~~submitted~~ **completed**. ~~It will identify updates as necessary.~~ **The requirement to complete a full revision of the LMICP will be assessed with the regulators each year and, at a minimum, it is expected that a full revision of the LMICP may be required at least every 5 years. Based on the number and types of changes required each September, either a revised document or Variance for each change required to the existing document will be submitted. The variance process established in the Fernald Preserve Quality Assurance Project Plan (DOE 2014) will be followed.**
- Each January, the **revised document or approved variances to the existing** document will be finalized to correspond with the monitoring and reporting schedule."

Justification:

With installation of the new wastewater treatment system in 2018 and the major changes in environmental monitoring that occurred in 2015 and 2016, it is expected that fewer changes will be required to the LMICP in the future.

For this reason, during the quarterly regulatory meetings held in spring and summer 2019, DOE proposed to EPA and Ohio EPA that the variance process established in the Fernald Preserve Quality Assurance Project Plan, Fernald, Ohio be used to communicate LMICP changes instead of updating the entire document every year. Further discussions took place with EPA and Ohio EPA in July 2019, and both agencies agreed to the proposed change to the LMICP revision process.

Requested By: Karen Voisard *KV* **Date:** 9/10/19

Variance Approvals

Variance Approvals

Required		Required	
Yes	No	Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>K. Fritts</u> <i>K. Fritts</i> <u>9/12/19</u> <small>Quality Assurance Date</small>		<u>M. Sizemore</u> <i>Mary E. Sizemore</i> <u>9/12/19</u> <small>Environmental Compliance Date</small>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>W. Hertel</u> <i>W. Hertel</i> <u>9/18/19</u> <small>Project Manager Date</small>		<small>Environmental Sampling Date</small>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<small>Laboratory Technical Representative Date</small>		<small>Aquifer Restoration Date</small>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>K. Voisard</u> <i>KV</i> <u>9-12-19</u> <small>Environmental Monitoring, Data Management and Reporting Date</small>		<small>Other Date</small>	

Revision Required Yes No **Document No. and Title:** _____

Distribution
 Records Management EPA
 Post to Web Page Ohio EPA

Variance

Variance number: 2020-02 **Significant:** Yes No
Document number: LMS/FER/S04396-12.0 **Page:** 1 of 1
Document title: Fernald Preserve Comprehensive Legacy Management and Institutional Controls Plan, Volume II **Date:** 9/18/2019

Variance

Requirements: Per Volume II, Figure 2, Fernald Preserve Prohibited Items (Page 12).

THE FOLLOWING ACTIVITIES AND ITEMS ARE PROHIBITED:

- | | |
|---|---|
| <ul style="list-style-type: none"> • Alcohol and illegal drugs • Firearms • Removing or damaging archaeological materials • Removing or damaging plants or plant parts (e.g., seed pods, fruit, leaves, firewood). • Mushroom gathering • Soil excavation • Swimming or wading | <ul style="list-style-type: none"> • Pets • Camping • Hunting, trapping, or fishing • Dumping • Fires, open flames, or smoking • Traveling off public roadways or trails • Using unmanned aerial systems (drones) • Tampering or damaging structures, fences, signs, or other property. |
|---|---|

Variance:

THE FOLLOWING ACTIVITIES AND ITEMS ARE PROHIBITED:

- | | |
|--|--|
| <ul style="list-style-type: none"> • Alcohol and illegal drugs • Firearms • Removing or damaging archaeological natural or man-made materials • Removing or damaging plants or plant parts (e.g., seed pods, fruit, leaves, firewood). • Mushroom gathering • Soil excavation • Swimming or wading | <ul style="list-style-type: none"> • Pets • Camping • Hunting, trapping, or fishing • Littering Dumping • Fires, open flames, or smoking • Traveling off public roadways or trails • Using unmanned aerial systems (drones) • Tampering or damaging structures, fences, signs, or other property. |
|--|--|

Justification:

Simplifying without radically altering the prohibited activities and items will be less ambiguous.

Requested By: John Homer **Date:** 9-12-2019

Variance Approvals

Required					
Yes	No				
<input checked="" type="checkbox"/>	<input type="checkbox"/>	K. Fritts	<u>K. Fritts</u>	<u>9/12/19</u>	
			Quality Assurance	Date	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	W. Hertel	<u>W. Hertel</u>	<u>9/18/19</u>	
			Project Manager	Date	
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Laboratory Technical Representative	Date	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	K. Voisard	<u>K. Voisard</u>	<u>9/12/19</u>	
			Environmental Monitoring, Data Management and Reporting	Date	

Variance Approvals

Required					
Yes	No				
<input checked="" type="checkbox"/>	<input type="checkbox"/>	M. Sizemore	<u>Mary Sizemore</u>	<u>9-12-19</u>	
			Environmental Compliance	Date	
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Environmental Sampling	Date	
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Aquifer Restoration	Date	
<input type="checkbox"/>	<input type="checkbox"/>		Other	Date	

Revision Required Yes No **Document No. and Title:** _____

Distribution	<input checked="" type="checkbox"/> Records Management	<input checked="" type="checkbox"/> EPA
	<input checked="" type="checkbox"/> Post to Web Page	<input checked="" type="checkbox"/> Ohio EPA

Variance

Variance number: 2020-03 **Significant:** Yes No
Document number: LMS/FER/S04396-12.0 **Page:** 1 of 1
Document title: Fernald Preserve Comprehensive Legacy Management and Institutional Controls Plan, Vol II and PCCIP **Date:** 9/18/2019

Variance

Requirements:

Vol II, Section 3.2: Fernald Preserve Inspections (Page 26):

"To ensure safe and effective inspections, the schedule was modified in 2015 to focus on walkdown completion during the dry, cooler months of November through April. Performing walkdowns during months when less vegetation is present optimizes visibility of site conditions and allows access to more areas."

PCCIP, Section 6.2.1.1 (Page 29):

"...the complete cap walkover is conducted annually in late fall or early winter, after warm season grasses have gone dormant."

Variance:

Vol II, Section 3.2:

To ensure safe and effective inspections, the schedule was modified in 2015 to focus on walkdown completion during the dry, cooler months of November through April. Performing walkdowns during months when less vegetation is present optimizes visibility of site conditions and allows access to more areas. **Additional field walkdowns will take place following prescribed burns. Vegetation is completely removed following a burn, so inspection findings such as erosion rills and debris are readily visible.**



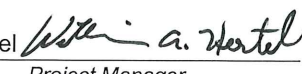
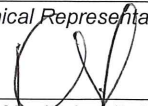
PCCIP, Section 6.2.1.1:

These conditions have become more prevalent during the spring walkdown. So, beginning in 2012, the complete cap walkover is conducted annually in late fall or early winter, after warm-season grasses have gone dormant. Additional walkdowns of recently burned or mowed areas ~~are also possible.~~ **will also be scheduled. Post-burn walkdowns have shown to be an optimal time for viewing inspection findings, such as erosion rills, animal burrows and woody vegetation.**

Justification:

Post-burn walkdowns have proven to be most effective on both the OSDF and the former Production Area. Vegetation is completely removed, so inspection findings such as erosion rills, debris and tree seedlings on the OSDF are readily visible. A spring 2019 walkdown across a burned area in the former production area resulted in the identification and removal of over 700 pieces of debris. All participants agree that post-burn walkdowns are effective.

Requested By: John Homer  **Date:** 9-10-2019

Variance Approvals				Variance Approvals			
Required				Required			
Yes	No	K Fritts 	<u>9/12/19</u>	Yes	No	M. Sizemore 	<u>9-12-19</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Quality Assurance</u>	<u>Date</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Environmental Compliance</u>	<u>Date</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	W. Hertel 	<u>9/18/19</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Environmental Sampling</u>	<u>Date</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Project Manager</u>	<u>Date</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Aquifer Restoration</u>	<u>Date</u>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Laboratory Technical Representative</u>	<u>Date</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Other</u>	<u>Date</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	K. Voisard 	<u>9-12-19</u>	<input type="checkbox"/>	<input type="checkbox"/>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Environmental Monitoring, Data Management and Reporting</u>	<u>Date</u>				

Revision Required Yes No **Document No. and Title:** _____

Distribution	<input checked="" type="checkbox"/> Records Management	<input checked="" type="checkbox"/> EPA
	<input checked="" type="checkbox"/> Post to Web Page	<input checked="" type="checkbox"/> Ohio EPA

Variance

Variance number: 2020-04 **Significant:** Yes No
Document number: LMS/FER/S04396-12.0 **Page:** 1 of 1
Document title: Fernald Preserve Comprehensive Legacy Management and Institutional Controls Plan, PCCIP **Date:** 9/18/2019

Variance

Requirements: Per PCCIP, Section 3.3, OSDF As-Built (Page 20).
 "To support each CERCLA Five-Year Review, aerial surveys of the site will be conducted via light detection and ranging (lidar) or equivalent technology every 5 years, beginning in 2019. These aerial surveys will allow for comparison of topography over time to detect changes in the OSDF cap that may not be observable during field walkdowns."

Variance:
 "To support each CERCLA Five-Year Review, aerial surveys of the site will be conducted via light detection and ranging (lidar) or equivalent technology every 5 years, beginning in 2019 **the spring of 2020 after the prescribed burn of the northern half of the cell cap.** These aerial surveys will allow for comparison of topography over time to detect changes in the OSDF cap that may not be observable during field walkdowns."

Justification:
 Postponing the lidar survey of the OSDF to support the CERCLA Five-Year Review in spring 2020 after the prescribed burn will allow a better survey to be completed.

Requested By: John Homer  **Date:** 9-10-2019

Variance Approvals

Required				Required			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	K. Fritts <i>K. Fritts</i> Quality Assurance	<u>9/12/19</u> Date	<input checked="" type="checkbox"/>	<input type="checkbox"/>	M. Sizemore <i>May Sizemore</i> Environmental Compliance	<u>9-12-19</u> Date
<input checked="" type="checkbox"/>	<input type="checkbox"/>	W. Hertel <i>W. Hertel</i> Project Manager	<u>9/18/19</u> Date	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Environmental Sampling	Date
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Laboratory Technical Representative	Date	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Aquifer Restoration	Date
<input checked="" type="checkbox"/>	<input type="checkbox"/>	K. Voisard <i>K. Voisard</i> Environmental Monitoring, Data Management and Reporting	<u>9/12/19</u> Date	<input type="checkbox"/>	<input type="checkbox"/>	Other	Date

Revision Required Yes No **Document No. and Title:** _____

Distribution	<input checked="" type="checkbox"/> Records Management <input checked="" type="checkbox"/> EPA <input checked="" type="checkbox"/> Post to Web Page <input checked="" type="checkbox"/> Ohio EPA
---------------------	---

Variance

Variance number: 2020-05 **Significant:** Yes No
Document number: LMS/FER/S04396-12.0 **Page:** 1 of 1
Document title: Fernald Preserve Comprehensive Legacy Management and Institutional Controls Plan, GWLMP **Date:** 9/18/2019

Variance

Requirements: Per GWLMP, Section 3.2.2, Leachate Monitoring Compliance Strategy (Page 26):
 "The monthly volume of leachate collected for treatment and subsequent disposal will be obtained based on the program in 40 CFR 264.303(c) to determine the flow rates of leachate collected in the LCS and water in the LDS. Monitoring the flow rates will provide data for determining the volume of leachate collected and will also provide data pertinent to the leak detection monitoring program. The flow rates are part of the leak detection monitoring program and are discussed further in Section 4.0. A separate leachate management monitoring strategy is provided as Section 5.0 to provide information on the method of leachate treatment and disposal, including analysis of parameters useful for leachate treatment."

Variance:
 "The monthly volume of leachate collected **from the LCS** for treatment and subsequent disposal **discharge** will be obtained based on the program in 40 CFR 264.303(c) to determine the flow rates of leachate collected in **from** the LCS and water in the LDS. **In 2018 LDS flow rates and volumes had diminished such that no LDS automatic tank pump outs occurred in any cell. Beginning in 2019, the volume of leachate collected for treatment and subsequent discharge from the LDS will be obtained based on periodic pump outs of the LDS.** Monitoring the flow rates will provide data for determining the volume of leachate collected and will also provide data pertinent to the leak detection monitoring program. The flow rates are part of the leak detection monitoring program and are discussed further in Section 4.0. A separate leachate management monitoring strategy is provided as Section 5.0 to provide information on the method of leachate treatment and disposal, including analysis of parameters useful for leachate treatment."

Justification:
 In 2018 LDS volumes had diminished such that no LDS automatic tank pump out occurred in any cell. LDS tanks for Cells 1,2,3,5, and 7 were too dry to collect semiannual samples so no pump out occurred in these LDS tanks in 2018, resulting in an accumulation rate of 0.0 gpad for Cells 1, 2,3, 5 and 7. The LDS tanks in Cells 4,6, and 8 accumulated enough water to collect routine semiannual samples in 2018; however, the volume of water accumulated in each of those LDS tanks during 2018 was very low, so accumulation rates had to be estimated by tracking the volume of water manually pumped out of each LDS tank and the amount of time between pump outs. This calculation was presented in the Fernald Preserve 2018 Site Environmental Report in Section A.5.1.2.

Requested By: Ken Broberg *[Signature]* **Date:** 9/18/2019

Variance Approvals

Variance Approvals

Required		Required	
Yes	No	Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
K. Fritts <i>[Signature]</i> <u>9/12/19</u> Quality Assurance Date		M. Sizemore <i>[Signature]</i> <u>9-12-19</u> Environmental Compliance Date	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
W. Hertel <i>[Signature]</i> <u>9/18/19</u> Project Manager Date		Environmental Sampling Date	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Laboratory Technical Representative Date		Aquifer Restoration Date	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
K. Voisard <i>[Signature]</i> <u>9/12/19</u> Environmental Monitoring, Data Management and Reporting Date		Other Date	

Revision Required Yes No **Document No. and Title:** _____

Distribution	<input checked="" type="checkbox"/> Records Management	<input checked="" type="checkbox"/> EPA
	<input checked="" type="checkbox"/> Post to Web Page	<input checked="" type="checkbox"/> Ohio EPA

Variance

Variance number: <u>2020-06</u>		Significant: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Document number: <u>LMS/FER/S04396-12.0</u>		Page: <u>1</u> of <u>1</u>	
Document title: <u>Fernald Preserve Comprehensive Legacy Management and Institutional Controls Plan, GWLMP</u>		Date: <u>9/18/2019</u>	
Variance			
<p>Requirements: Per GWLMP, Section 4.4.2.1, Leachate Monitoring Compliance Strategy (Page 41):</p> <p>"The volume of leachate pumped from the LCS/LDS tanks is recorded. Flow from each cell's LCS and LDS tanks is compiled daily and trended to provide an indication of changes in system performance. An average daily LDS flow rate (in gpad) is calculated from the monthly flow rate. Flow data are available to EPA and Ohio EPA on the Fernald Preserve website (https://www.lm.doe.gov/Fernald/Downloads.aspx) and are reported annually in the Site Environmental Report."</p>			
<p>Variance:</p> <p>"The volume of leachate pumped from the each LCS/LDS tanks is recorded. Flow from each cell's LCS and LDS tanks is compiled daily and trended to provide an indication of changes in system performance. LDS flow rates are estimated by tracking the volume of water manually pumped out of each LDS tank and the amount of time between pump-outs. An average daily LDS flow rate (in gpad) is calculated from the monthly flow rate. Flow data are available to EPA and Ohio EPA on the Fernald Preserve website (https://www.lm.doe.gov/Fernald/Downloads.aspx) and are reported annually in the Site Environmental Report."</p>			
<p>Justification:</p> <p>In 2018 LDS volumes had diminished such that no LDS automatic tank pump out occurred in any cell. LDS tanks for Cells 1,2,3,5, and 7 were too dry to collect semiannual samples so no pump out occurred in these LDS tanks in 2018, resulting in an accumulation rate of 0.0 gpad for Cells 1, 2,3, 5 and 7. The LDS tanks in Cells 4,6, and 8 accumulated enough water to collect routine semiannual samples in 2018; however, the volume of water accumulated in each of those LDS tanks during 2018 was very low, so accumulation rates had to be estimated by tracking the volume of water manually pumped out of each LDS tank and the amount of time between pump outs. This calculation was presented in the Fernald Preserve 2018 Site Environmental Report in Section A.5.1.2.</p>			
Requested By: <u>Ken Broberg</u>		Date: _____	
Variance Approvals		Variance Approvals	
Required		Required	
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
<u>K. Fritts</u>	<u>K. Fritts</u>	<u>M. Sizemore</u>	<u>M. Sizemore</u>
<u>Quality Assurance</u>	<u>9/12/19</u>	<u>Environmental Compliance</u>	<u>9-12-19</u>
	<u>Date</u>		<u>Date</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>W. Hertel</u>	<u>W. Hertel</u>	<u>Environmental Sampling</u>	<u>_____</u>
<u>Project Manager</u>	<u>9/18/19</u>	<u>_____</u>	<u>Date</u>
	<u>Date</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Aquifer Restoration</u>	<u>_____</u>
<u>Laboratory Technical Representative</u>	<u>_____</u>	<u>_____</u>	<u>Date</u>
		<input type="checkbox"/>	<input type="checkbox"/>
<u>K. Voisard</u>	<u>K. Voisard</u>	<u>Other</u>	<u>_____</u>
<u>Environmental Monitoring, Data Management and Reporting</u>	<u>9/12/19</u>	<u>_____</u>	<u>Date</u>
	<u>Date</u>		
<p>Revision Required <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Document No. and Title: _____</p>			
Distribution	<input checked="" type="checkbox"/> Records Management	<input checked="" type="checkbox"/> EPA	
	<input checked="" type="checkbox"/> Post to Web Page	<input checked="" type="checkbox"/> Ohio EPA	

Variance

Variance number: 2020-07 **Significant:** Yes No
Document number: LMS/FER/S04396-12.0 **Page:** 1 of 1
Document title: Fernald Preserve Comprehensive Legacy Management and Institutional Controls Plan, Community Involvement Plan **Date:** 9/18/2019

Variance

Requirements:
 Appendix A (Contact List) of the Community Involvement Plan provides contact information for federal, state and local elected officials.

Variance: Appendix A (Contact List) will be updated following the November 2019 election results. The final, updated Contact List will be distributed with this variance prior to January 1, 2020.

Justification: Updates will be based on upcoming November 2019 election results.

Requested By: Penny Borgman *Penny Borgman* **Date:** 9/12/19

Variance Approvals				Variance Approvals			
Required		Required		Required		Required	
Yes	No	Yes	No	Yes	No	Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Quality Assurance</u>		<u>Date</u>		<u>Environmental Compliance</u>		<u>Date</u>	
<u>W. Hertel</u>		<u>9/18/19</u>		<u>Environmental Sampling</u>		<u>Date</u>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Project Manager</u>		<u>Date</u>		<u>Aquifer Restoration</u>		<u>Date</u>	
<u>Laboratory Technical Representative</u>		<u>Date</u>		<u>Other</u>		<u>Date</u>	
<u>K. Voisard</u>		<u>9/12/19</u>					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<u>Environmental Monitoring, Data Management and Reporting</u>		<u>Date</u>					

Revision Required Yes No **Document Title:** _____

Distribution	<input checked="" type="checkbox"/> Records Management	<input checked="" type="checkbox"/> EPA
	<input checked="" type="checkbox"/> Post to Web Page	<input checked="" type="checkbox"/> Ohio EPA