

Revised Work Plan
For
The Revised Feasibility Study
For
The Oklahoma Refining Company Superfund Site

Prepared by:
The Oklahoma Department of Environmental Quality
707 North Robinson, Oklahoma City, Oklahoma 73102

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Submitted to:
Kathy Gibson
Superfund Division
USEPA, Region 6

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Introduction

Purpose

The EPA Region 6 Strategic Plan dated April 2004, notes that contaminated lands, such as those found at the Oklahoma Refining Company (ORC) Superfund Site, pose risks to human health and the environment. Contaminants may be leached from waste sources and migrate to underground aquifers or surface waters. Individuals may be exposed to harmful substances through incidental ingestion and dermal contact with contaminated soils, sediment, surface water, or groundwater. The funding for this project would provide significant benefits for both the State of Oklahoma and EPA by allowing the State to determine the extent of contamination on the north side soils and remedial alternatives for north side soils, site-wide groundwater, and portions of Gladys Creek. The city of Cyril had shown interest in reusing the property because of the close proximity to the railroad and downtown Cyril. This project would allow for EPA Region 6 to achieve its goal of cleaning up contaminated sites and returning the land to productive use.

The purpose of the Revised Feasibility Study (RFS) is to evaluate cleanup alternatives for the north side soils, groundwater, and Gladys Creek at the ORC Superfund site. The north portion of the ORC site encompasses 80 acres of soil that has not been fully investigated or remediated. The groundwater contamination at the ORC site consists of an 80 acre plume of LNAPL and a much larger dissolved phase that ultimately leaves the site via groundwater discharge to surface water. The groundwater remediation in the Record of Decision (ROD) consisted of a pump and treat system. On December 5, 1995, the EPA and ODEQ agreed to modify and postpone the remedy to a second construction phase after the completion of the source remedy. Recent samples show that Gladys Creek is being impacted from contaminated groundwater at the site. There is an acid seep and caustic seep that shows visual impacts from the groundwater.

Background

The ORC site covers approximately 220 acres. The site encompasses an area that was used for petroleum refining purposes for approximately 80 years. The ORC site was added to the National Priorities List (NPL) of hazardous waste sites in June 1988. On December 5, 1995, the EPA and ODEQ agreed to postpone the groundwater portion of the remedy to a second construction phase after the completion of the source remedy. A Remedial Action was completed on the south portion of the site in March 2003. The groundwater was not addressed during this Remedial Action. Remaining soil contamination on the north side of the site, and site-wide groundwater, had yet to be addressed by 2003.

The north portion of the site was regulated under the Resource Conservation and Recovery Act (RCRA) until August 2002 when it was deferred to Superfund authority. The EPA Emergency Response Branch began a removal action on the north portion of the site in August 2003 that included demolition of the process equipment and tanks and their contents. Soil contamination may still be present on this portion of the site.

Contaminants present at the site included volatile organic compounds, such as benzene, toluene and xylenes, semi-volatile organic compounds, and a number of heavy metals including arsenic, cadmium, and lead. The wastes at the site were present in the surface soils, subsurface soils, sediments, surface water, and groundwater. The groundwater contamination includes a free-floating light LNAPL hydrocarbon plume and dissolved phase contaminants. The proposed Revised Feasibility Study (RFS) will evaluate cleanup alternatives for the north side soils, site-wide groundwater, and Gladys Creek at the ORC Superfund site.

Proposed Statement of Work

It is noted that funding available from EPA is \$200,000 and that work for the RFS will need to meet this budget. Therefore, only certain tasks with a high priority, as shown in Attachment 1, will be conducted with the original budget of \$200,000. However, if additional funding becomes available, the remaining tasks for the RFS will be conducted. The cost estimate reflects the costs for all tasks in the RFS. All tasks listed for the RFS would give the greatest amount of information and support for choosing remedial alternatives at the Site.

Task 1 RFS for North Side Soil and Gladys Creek

Task 1 consists of the RFS for the north side soil and Gladys Creek, including the overall project planning for the RFS project, community relations, information gathering, sampling, and the Phase 1 Report. Each element of Task 1 is divided into subtasks as listed below. A detailed table showing all tasks and subtasks is attached to this work plan as Attachment 1. The table describes who will perform the work, the cost, time frame, priority of the task, and phase of the RFS for each task and subtask.

Task 1.1 Overall Project Planning

Task 1.1 should include but not be limited to the following:

- Review and summarize all existing data;
- Identify data gaps for such items as locations, media, analytes, detection limit inadequacies, etc.

The ODEQ will review all available information pertaining to the site and incorporate this information into the sampling plans.

The ODEQ will develop a detailed sampling plan for all media to be investigated. These plans should include but will not be limited to: Sampling and Analysis Plan (SAP), Health and Safety Plan (HASP), Quality Assurance Project Plan (QAPP), and Standard Operating Procedures (SOP). Drafts will be submitted to the EPA for review, and comments will be incorporated into the final plans.

The SAP will be developed using the Visual Sampling Plan (VSP) program to help determine an adequate number of samples and sample locations, if sampling is necessary.

A draft project schedule by task and subtasks depicting their interrelationships and durations has been attached to this work plan as Attachment 2. The ODEQ will prepare a final project schedule by task and subtasks depicting their interrelationships and durations. The project schedule will be updated quarterly and submitted to EPA.

The ODEQ will develop a database to inventory data gathered during the project. The database will incorporate existing data. The format will be Geographic Information System (GIS) (ArcView® GIS).

Task 1.2 Community Relations

The ODEQ has primary responsibility for community relations and the existing Community Involvement Plan needs to be updated due to recent project management changes. The plan will be updated during this project. The ODEQ will develop site fact sheets and hold periodic public meetings.

Task 1.3 Field Work

This task may be performed if the data evaluation in Task 1.1 determines that more data is required to develop appropriate remedial action alternatives. This task includes but is not limited to all activities required for sampling, sample analysis, data validation, tabulation, and evaluation and will be sequenced in a manner that maximizes efficiency and minimizes costs. These activities are identified below.

The data quality objectives for this RFS will be met by employing the highest data quality control and assurance and will follow EPA's Quality Assurance Guidance Document (QAPP, 1998), and EPA's Data Quality Objectives (DQO, 1993). The ODEQ will also follow the Contract Laboratory Program's (CLP) statement of work to achieve laboratory data quality objectives.

Subtask 1.3.1 Soil

Work to be performed under this subtask will include but is not limited to:

- Confirm and/or update the aerial extent and volume of contaminated soil on the north side as determined by either existing data and/or sampling data.
- Collect and deliver to CLP an adequate number of samples to characterize the contaminated soil.
- Provide boring logs for all borings done.
- Upon receipt of results, compile and tabulate the data.

Subtask 1.3.2 Gladys Creek Surface Water and Sediment

The ODEQ will collect and deliver to CLP an adequate number of samples to characterize the nature and extent of the surface water and sediment contaminants in Gladys Creek.

Gladys Creek is an environmental receptor of contaminated groundwater and currently there are visible impacts from the site into the creek. Past surface water and sediment sampling has been non-routine and mostly tied to investigations, i.e. RI/FS, Baseline Sampling. Routine surface water and soil/sediment sampling of Gladys Creek will be pursued to develop a better understanding of contaminant migration from groundwater to surface water. This will enhance the ability to determine the benefit, if any, of source removal on Gladys Creek, to quantify any changes to risk to health and the environment, and to assist in assessment of natural attenuation as a remedial option. The sampling will consist of an adequate amount of surface water samples and sediment samples. Surface water grab samples will be taken beginning downstream, working upstream. After each surface water sample is collected a sediment sample will be taken at a depth of zero to six inches with stainless steel spoons. All samples will be submitted to CLP for analysis.

Subtask 1.3.3 Phase 1 Report

All the data gathered during Task 1 will be data reduced, compiled and tabulated in the Phase 1 Report. The report will include all activities performed under Task 1.

Task 2 Expanded RFS for Groundwater

This groundwater portion of the work plan involves continuing LNAPL surveys, containment well sampling, further investigation of LNAPL, MNA sampling, and well maintenance. A group of forty-two wells will be monitored quarterly for the presence of LNAPL to determine the thickness and extent of the LNAPL plume and to help determine the mobility of the LNAPL plume. Six wells will be monitored semi-annually to assess containment migration, if any, of contaminants of concerns (COCs), to help determine the extent and degree of contamination and associated risk to human health or the environment. If funding is available, a group of fourteen wells will be monitored on a semi-annual basis to help determine the extent and degree of contamination on-site and to evaluate natural attenuation parameters. Existing wells may require repair and new wells may need to be added. Additional groundwater data may be collected as needed.

ODEQ will collaborate with the USEPA Robert S. Kerr Environmental Research Center on the evaluation of LNAPL, MNA, clean-up alternatives, and any other requests as appropriate and time allows.

Task 2.1 LNAPL Surveys

The LNAPL surveys consists of forty-two wells to be monitored by ODEQ personnel on a quarterly basis to determine the thickness and extent of the LNAPL plume as well as the mobility of the plume. A mobile LNAPL plume would present a significant threat to environmental receptors in Gladys Creek. These wells are: SBB-1, SBB-2, SBB-4, SBB-5, SBB-17, SBB-24, SBB-25, SBB-28, SBB-37, DGR-03, DOW-07, DOW-08, SBB-6, SBB-7, SBB-12, SBB-13, SBB-14, SBB-15, SBB-16, SBB-21, SBB-23, RMW-1S, RMW-4S, RMW-6, DLR-01, DLR-02, DLR-03, DLR-04, DLR-05, DLR-06, DLR-07, DLR-10, DLR-11, DOW-03, SBB-09, SBB-20, SBB-27, RMW-2S, RMW-3S, OSL-1, OSL-2, and OSL-3. Wells will be added as needed if the plume is migrating.

Task 2.2 Containment Well Sampling

Containment well sampling consists of six wells that will be sampled by ODEQ personnel on a semi-annual basis to evaluate migration of COCs. It is important to note that these wells are off-site wells. This information will also be used with other data to evaluate the effectiveness of the source removal remedy and whether the contaminants are leaving the site.

Two of the wells to be sampled are located near the residential area. Four additional wells are located across Gladys Creek from the site. The ODEQ considers the groundwater data from these wells to be essential in the evaluation of groundwater

adjacent to and beneath the site. These wells are: SBB-19, SBB-22, SBB-28, SBB-31, SBB-33, and SBB-34.

Task 2.3 LNAPL Investigation

The LNAPL investigation consists of further delineation of the LNAPL plume through a resistivity study, sampling of wells that are not currently sampled, recoverability study, and sampling groundwater in LNAPL wells. These tasks are further described below.

Subtask 2.3.1 Groundwater Sampling

ODEQ will sample all wells not currently sampled at the Site. There are currently twenty-four wells that have not been sampled since the Remedial Design or Remedial Action. Sampling these wells will achieve a site-wide baseline for groundwater contamination. This will allow ODEQ to compare remediation sampling results to a set of baseline results in order to determine if remediation of groundwater contamination is occurring. The wells included in this sampling event are: DLR-1, DLR-4, DLR-5, DOW-3, IBB-2, IBB-3, IBB-4, IBB-5, RMW-1D, RMW-2D, RMW-3S, RMW-3D, RMW-4D, SBB-1, SBB-3, SBB-7, SBB-8, SBB-9, SBB-10, SBB-11, SBB-14, SBB-18, SBB-36, and SBB-38.

The DEQ will submit to EPA a summary report of the analytical results after the sampling event is complete.

Subtask 2.3.2 Resistivity Study

The ODEQ will work with the Kerr Lab and a specialized contractor to conduct a resistivity survey across the Site. The resistivity survey will provide a detailed description of the locations and thickness of LNAPL at the Site. This survey is conducted by electrical resistivity imaging and results in a two- and/or three-dimensional representation of the subsurface of the site. This technology will give the most cost effective and best representation of LNAPL locations across the Site. Identifying the exact location and thickness of LNAPL will allow for a remedial alternative that will best address the contamination.

The DEQ will submit to EPA a report that summarizes the results of the resistivity study when it is complete.

Subtask 2.3.3 Recoverability Study

The ODEQ will work with Kerr Lab to conduct a recoverability study of the LNAPL at the Site. The LNAPL in wells will be bailed and allowed to recover. The time and amount of LNAPL recovered in the wells will allow for a remedial alternative to be selected that will best address the physical properties of the LNAPL at the Site. The wells that could be used in the study are: SBB-2, SBB-4, SBB-5, SBB-15, SBB-23, SBB-24, SBB-37, DLR-3, DLR-7, DLR-10, DLR-11, DGR-3, DOW-7, DOW-8, and RMW-1S.

The DEQ will submit to EPA a report that summarizes the results of the recoverability study when it is complete.

Subtask 2.3.4 Sample Groundwater in LNAPL Wells (optional)

The DEQ will, if funding is available, sample ground water in wells with LNAPL for VOCs, SVOCs and metals. This will establish what contaminants are in the ground water under the LANPL. The wells that could be sampled are: SBB-2, SBB-4, SBB-5, SBB-15, SBB-23, SBB-24, SBB-37, DLR-3, DLR-7, DLR-10, DLR-11, DGR-3, DOW-7, DOW-8, and RMW-1S.

The DEQ will submit to EPA a report that summarizes the results of the ground water sampling when it is complete.

Subtask 2.3.5 Drill Additional Wells on North Side of Site (optional)

The DEQ will, if funding is available, drill additional monitoring wells on the north side of the Site to delineate ground water contamination. Up to six wells could be installed. After installation all wells would be sampled for VOCs, SVOCs and metals.

The DEQ will submit to EPA a report that summarizes the results of the drilling and ground water sampling when it is complete.

Subtask 2.3.6 Sulfate Concentrations (optional)

The DEQ will, if funding is available, sample the ground water in wells with LNAPL for sulfate. Literature indicates that BTEX compounds can be biodegraded under sulfate-reducing conditions. To help determine if natural attenuation is occurring in the LNAPL plume area, the sulfate concentration in the ground water below the LNAPL column would be measured. The wells that could be sampled are: SBB-2, SBB-4, SBB-5, SBB-15, SBB-23, SBB-24, SBB-37, DLR-3, DLR-7, DLR-10, DLR-11, DGR-3, DOW-7, DOW-8, and RMW-1S.

The DEQ will submit to EPA a report that summarizes the results of the ground water sampling when it is complete.

Task 2.4 MNA

If funding is available, the ODEQ will conduct two more rounds of MNA sampling at fourteen wells. These wells may be sampled again, if needed, to help evaluate the extent and degree of contamination and their migration and/or attenuation over time, the effectiveness of source removal, and the efficacy of natural attenuation as a remedial option. This information will be used with other data to evaluate the effectiveness of the source removal remedy and whether remedial activities are needed for the groundwater. These wells are: SBB-30, SBB-25, SBB-17, RMW-4S, RMW-9, RMW-10, SBB-21, DLR-6, SBB-20, SBB-13, RMW-2S, RMW-6, SBB-6, and SBB-16. If funding is available, two sets of transect wells will be installed to determine if natural attenuation is occurring at the Site and three wells on the south side will be installed in former source areas to determine the maximum concentration of contaminants in groundwater at the Site.

The DEQ will submit to EPA a report that summarizes the results of the ground water sampling after each sampling event. Evaluation of all MNA data will be completed during the Revised Feasibility Study Report (See Task 3).

Task 2.5 LNAPL Extraction Technologies

ODEQ and Kerr Lab will work together to determine and identify the possible technologies for LNAPL extraction at the Site. The LNAPL is a current source of contamination to the groundwater and removal of the source would allow easier and quicker remediation of the contaminated groundwater.

Task 3 Revised Feasibility Study Report

The ODEQ will work with a contractor to produce the RFS Report. ODEQ will acquire contractor services for the RFS Report through the Oklahoma Department of Central Services On Call Consultants Program. The On Call Consultant Program is to facilitate quick delivery of architectural and engineering services for minor projects. The program is a non-mandatory service provided to State agencies. The process of hiring a contractor could take up to six months.

The report shall include an introduction and conclusion and incorporate the following information as chapters. The report will follow the appropriate EPA RI/FS Guidance. The report will include the preparation of the draft RFS report, any review meetings required, incorporation of any comments as a result of the review, and the final RFS report. The draft report will be submitted to EPA for review and comment. Any changes to the draft final report will be reflected in the final report.

The RFS Report will include the following:

- Identification of Applicable or Relevant and Appropriate Requirements (ARARs) in accordance with EPA guidance and consistent with ODEQ policy. The ODEQ will give primary consideration to the selection of response actions that are effective in preventing or minimizing the release of hazardous substances so that they do not migrate and cause substantial danger to present or future public health, welfare, or the environment. This can be accomplished by pursuing remedies that attain or exceed the ARARs. Identifying ARARs will include a description of the chemical-specific, action-specific, and location-specific ARARs (ARARs, 1991).
- Screening of technologies and process options used to assemble the remedial action alternatives. This process involves the development of media-specific general response actions, identification and screening of remedial technologies within each general response action, and identification and screening of process options within each technology. A minimum of five remedial action alternatives will be developed and refined to suit the ORC site, if necessary. Evaluation of MNA data, groundwater sampling data, and soil sampling data will be performed during this task in order to determine applicable remedial action alternatives. The

development of media-specific remedial action objectives (RAOs) was completed in the 1992 ROD.

- Screening of remedial action alternatives. This involves developing comprehensive remedial action alternatives from the process options that have been retained. Remedial action alternatives will be developed separately for surface water, sediment, surface soil, and groundwater. Only those hazardous waste management alternatives that will remediate or control contaminated media remaining at the site to provide adequate protection of human health and the environment will be considered. The potential alternatives will encompass, as appropriate, a range of alternatives in which treatment is used to reduce the toxicity, mobility, or volume of wastes but vary in the degree to which long-term management of residuals or untreated waste is required, one or more alternatives involving containment with little or no treatment; and a no-action alternative. Alternatives that involve minimal efforts to reduce potential exposures (e.g., site fencing, deed restrictions) will be presented as "limited action" alternatives.
- Performing a remedial alternatives evaluation. The evaluation will include: (1) a technical description of each alternative that outlines the waste management strategy involved and identifies the key ARARs associated with each alternative; and (2) a discussion that profiles the performance of that alternative with respect to each of the evaluation criteria. A table summarizing the results of this analysis will be provided in the report. Once the individual analysis is complete, the alternatives will be compared and contrasted to one another with respect to each of the evaluation criteria. The nine evaluation criteria are: overall protection of human health and the environment; compliance with ARARs; long-term effectiveness and permanence; reduction of toxicity, mobility, or volume through treatment; short-term effectiveness; implementability; costs; State acceptance; and community acceptance.

Task 4 Amended Proposed Plan

The ODEQ will be the agency to present the amended Proposed Plan to the public; the EPA will be present in a support role. The ODEQ will develop the revised Proposed Plan, which highlights the proposed changes to the original ROD. The purpose of the Revised Proposed Plan is to facilitate public participation in the remedy selection process by holding a public meeting and public comment period as required by the NCP. The ODEQ will prepare a responsiveness summary after the public comment period.

Task 5 Draft ROD Amendment and Administrative Record

After the public comment period, the comments will be incorporated into the amended Proposed Plan and a draft ROD Amendment will be submitted to EPA for issuance. The ODEQ will update the Administrative Record and the Administrative Record Index as necessary.

Outputs

The ODEQ will monitor and sample the north side soils, groundwater, and Gladys Creek. The data collected from these sampling events, along with previous information, will help in the development of remedial alternatives and ultimately lead to the Amended Proposed Plan and ROD Amendment stating the cleanup methods for the site.

Outcomes and Measurements

Outcomes for this project coincide with EPA Region 6 Strategic Plan Land Preservation and Restoration Goal 3.2.2: “Clean up and Reuse Contaminated Land.”

1. Control all identified unacceptable human exposures from site contamination
 - a. Determine extent of contamination and method of cleanup for the north side soil
2. Control migration of contaminated groundwater through engineered remedies or natural processes
 - a. Determine the best remedy or natural process to control the contaminated groundwater migrating to Gladys Creek
3. Select final remedies
 - a. Determination of remedial alternatives for the north side soils, groundwater, and Gladys Creek

ODEQ Activities

1. Develop a final project schedule to identify major milestones.
2. Update the site’s community involvement plan and hold periodic public meetings.
3. Review existing data to identify existing data gaps and further refine the sampling plan.
4. Travel to the site for field reconnaissance, sampling, and meet with local officials and the community.
5. Task 1 sampling may include soil sampling on the north side, Gladys Creek surface water, and sediment sampling.
6. Task 2 sampling may include groundwater sampling which includes containment wells, MNA wells, LNAPL monitoring, and other groundwater data as necessary.
7. Utilize data generated from task 1 and 2 sampling to develop a RFS Report.
8. Liaison with local government, tribes, and EPA to identify community concerns.
9. Prepare all site documents, including sampling plans, GIS database, Phase 1 Report, RFS, Amended Proposed Plan, Responsiveness summary, and draft ROD Amendment.
10. Update the Administrative Record and Index as necessary.
11. Procure and manage contracts as deemed necessary.
12. Report quarterly to EPA as required by 40 CFR 35 Subpart O.

Cost Estimate

See attached application.

Table of Tasks, Costs, Time Frames, and Priorities

See Attachment 1.

Draft Project Schedule

See Attachment 2.

**Attachment 1: Table of Tasks, Costs, Time Frames, and
Priorities**

Task #	Task Name	Work to be performed by	Cost	Time Frame to Accomplish	Priority (1-high, 2-moderate, 3-low)	Phase
1	Revised Feasibility Study for north side soil and Gladys Creek	ODEQ	\$30,806	1 year	1	1 or 2
1.1	Overall Project Planning					
1.2	Community Relations					
1.3	Field Work					
1.3.1	Soil Sampling					
1.3.2	Gladys Creek Surface Water and Sediment					
1.3.3	Phase 1 Report					
2	Expanded Treatability Study/Feasibility Study for ground water				1	
2.1	Continue LNAPL Surveys	ODEQ	\$7,295 per year	durrantion of project	1	on-going
2.2	Containment Well Sampling	ODEQ	\$9,848 per year	durrantion of project	1	
2.3	LNAPL					
2.3.1	Sample all wells not currently sampled (24 wells total)	ODEQ	\$13,814	3 months	1	1
2.3.2	Resistivity survey	Contractor w/Kerr Lab	\$75,000	3 months	1	
2.3.3	Recoverability study of LNAPL	ODEQ & Kerr Lab	\$10,048	3 months	1	
2.3.4	Sample ground water in LNAPL wells *	ODEQ	\$7,233	3 months	2	
2.3.5	Drill more wells in the north side of the site *	ODEQ & Kerr Lab	\$11,959	3 months	2	
2.3.6	Determine sulfate concentrations in ground water below the LNAPL column	ODEQ & Kerr Lab	\$10,169	3 months	2	
2.4	MNA					2
2.4.1	Perform two more rounds of MNA sampling	ODEQ	\$21,650	1 year	1	
2.4.2	Drill 2 sets of transect wells	ODEQ & Kerr Lab	\$14,093	1 year	2	
2.4.3	Drill 3 new wells on the south side of the site in former source areas.	ODEQ & Kerr Lab	\$8,686	3 months	2	
2.5	ID possible technologies for LNAPL extraction	ODEQ & Kerr Lab	\$4,240	4 months	1	3
3	Revised Feasibility Study Report **	Contractor & ODEQ	\$25,000	5 months	1	4
4	Draft Revised Proposed Plan	ODEQ	\$3,988	4 months	1	
5	Draft ROD Amendment	ODEQ	\$2,701	3 months	1	

Notes:

Does not include Kerr Lab Cost.

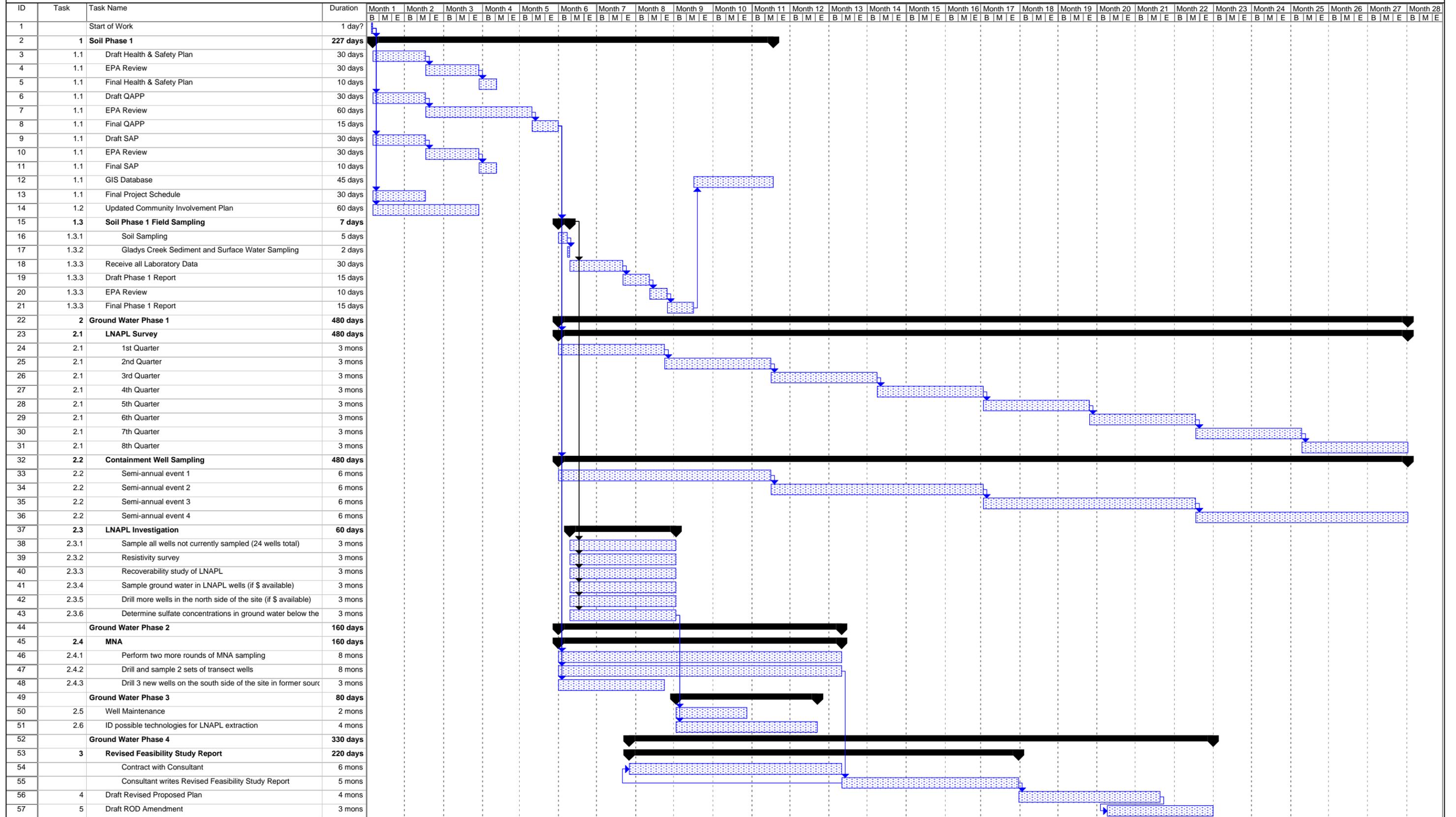
ODEQ will use EPA labs to run all analytical analysis.

* Task will be performed if funding is available.

** Cost could change depending on results of previous phases.

Attachment 2: Draft Project Schedule

ORC Revised FS Draft Schedule



Project: ORC_RFS_1007_final
Date: Fri 10/26/07

Task Progress Summary External Tasks Deadline
Split Milestone Project Summary External Milestone