Table 1: Status of Corrective Actions Associated with the 1995 SDWA AOC

Provision	AOC Paragraph	Enclosure	Narrative Response	Action Completed?
Cease Disposal	I.17a	1	BIA has fulfilled the requirements of AOC Paragraphs 17a, 17b and 17c, as documented by the BIA fax from WRO to ENA, dated June 20, 1995, and the BIA letter to EPA, dated June 21, 1998.	**Yes**
	I.17b			**Yes**
	I.17c			**Yes**
Investigation Work Plan	II.18	2	BIA has completed several work plans to investigate suspected and confirmed petroleum releases from the heating oil line, disposal well, hazardous materials storage areas, and aboveground and underground storage tanks systems. The "Roads Shop Facility Work Plan", Bureau of Reclamation, dated October 22. 1998 provided planning information responsive to the work plan requirements.	Yes
	II.19			Yes
	II.20			Yes
Close Disposal Well	II.A.21	4	Characterization of the drain line and disposal well are provided in two reports, "Subsurface Investigation Report", SECOR, dated May 1, 2000 and "Additional Roads Shop Soil Investigation", SECOR, dated November 2004. The investigation and removal of the disposal well and drain line, excavation of petroleum contaminated soils (PCS), and sealing of the drain line are provided in the SECOR Letter Report to EPA, dated July 21, 2005. Characterization of the materials in the Facility Sump is provided in the report, "Characterization, Packaging and Labeling of Materials in Owyhee, Nevada", MSE, Inc., dated July 18, 1995.	Yes
	II.A.22	3		Yes
	II.A.23	4		Yes
	II.A.24	3		Yes
	II.A.25	3		Yes
	II.A.26	4	EPA approved completion of disposal well closure responsibilities through their letter to BIA, dated January 17, 2007.	Yes
	II.A.27	NA	No other injection wells occur at the Facility.	Yes
16,000-Gallon Tank and Pipeline	II.B.28	4	Investigation of petroleum releases from the heating oil tank and pipeline and removal of PCS are documented in the reports: (1) "Sampling Results for the Bureau of Indian Affairs, Roads Shop Fuel Oil Pipeline on the Duck Valley Indian Reservation", MSE, Inc.; (2) "Subsurface Investigation Report", SECOR, dated May 1, 2000; (3) "Groundwater Impact Assessment of Former BIA Roads Shop on Owyhee Drinking Water Wells", SRK Consulting, dated May 2000; and (4) "Report of Findings from Soil Excavation and Groundwater Monitoring", SECOR, dated January 2, 2003. Removal of the heating oil line is found in the two SECOR reports, dated May 1, 2000 and January 2, 2003. Removal of the heating oil tank is documented in the SRK report, dated May 2000.	Yes
	II.B.29	3		Yes
	II.B.30	3		Yes
	II.B.31	3		Yes
Sample Drinking Water Wells	II.C.32	7	Drinking water wells have been sampled and analyzed by BIA and EPA extensively for a wide variety of compounds since 1988. Groundwater analyses have been focused on petroleum and pesticides. The "Roads Shop Facility Work Plan", dated October 22, 1998 presented the plan to sample these wells and install monitoring wells. Since 1998, several monitoring wells have been installed in and around the heating oil line, the drinking water wells, and the Facility.	Yes
	II.C.33	7		Yes
	II.C.34	7		Yes
Site Characterization	II.D.35	5	Well operation and construction for Wells #1, #2, and #3 has been conducted. Historical drinking water operation has been provided. Geophysical logging of the wells has been conducted. Well construction and abandonment information has been provided.	Yes
	II.D.36	5		Yes
	II.D.37	6	BIA has assembled the necessary information as required by the AOC to include: (1) geological cross sections; (2) well logs; (3) horizontal gradient and flow direction of the shallow aquifer; (4) site stratigraphy; and (5) soil data to include bulk density, porosity and hydraulic conductivity.	Yes
	II.D.38	NA		Yes
	II.D.39	2	Although work plans have substantially determined the extent of soil contamination, additional soil sampling is planned.	No
Site Remediation	II.E.40	2	The BIA has effectively cleaned up the soils. A plan and the associated characterization work needs to be developed for groundwater.	No
	II. E.41	4	Proper characterization and disposal of all hazardous materials stored in drums and containers stored at the Facility has occurred.	Yes
	II.E.42	4		Yes
	II.E.43	4	Removal and disposal of contaminants and surface soils above action levels has occurred.	Yes
	II.E.44	4	Although natural attenuation is planned, a work plan needs to be developed to further analyze remedial alternatives for the groundwater. This work plan will involve the abandonment of wells, well installation, soil borings, soil and groundwater analyses, and groundwater monitoring.	No
	II.E.45	4		No