

April 11, 2013

Ms. Holly Burke
State Cooperative Program/Remedial Section
Kansas Department of Health and Environment
1000 SW Jackson Street, Suite 410
Topeka, Kansas 66612-1367

**RE: Catchment Dike System Compliance Sampling Report March 2013
National Zinc Smelter Site, Cherryvale, Kansas**

Dear Ms. Burke,

On February 19, 2013 Project Navigator, Ltd. on behalf of United States Steel Corporation (USS) and Citigroup Global Market Holdings, Inc. (Respondents), completed an inspection of the Drum Creek Catchment Dike System (CDS) and collected three composite sediment samples for laboratory analysis as part of the agreed-upon bi-annual compliance monitoring. The work was performed by Philip Jen, P.G. and Mark Landress, P.G. of Project Navigator, Ltd.

Inspection and sampling of the Drum Creek Catchment is performed 2 times per year as part of the closure of the former National Zinc Smelter Site, in Cherryvale, Kansas. The results of the inspection, the sediment collection methodology and associated analytical results, including a comparison to the results of the samples taken during previous sampling events are provided in this letter report.

Inspection

The location of the CDS is provided in Figure 1. The catchment was observed to be in good condition and the upstream and downstream gabions were intact and well anchored to the banks. Water depth between the dikes was approximately 0.5 to 1 foot deep measured at the inside of the upstream catchment dike. Water flow was low at the time of inspection. Sediment accumulation between the dikes was minimal. Photos of the catchment are provided in Appendix 1.

Analytical Sampling and Results

The sampling locations and representative sediment photographs are depicted in Figures 2 and 3. Samples consisted of poorly sorted medium grained gravel, with minor sand and silt. Minor amounts of organic materials consisting of wood and leaf debris were observed in the sediment.

Samples were collected with a plastic retriever scoop, placed into clean 5 gallon buckets and homogenized prior to placement in 4 ounce sample jars provided by the laboratory. Samples were composites of sediment from random points across the area of

accumulation; to the extent the locations were accessible. Water present in the samples was slowly decanted from the sample container following collection. Samples contained minimal excess water. Sample containers were then sealed and packed into a cooler with ice for shipment to the laboratory for analysis.

The Respondents' samples were submitted to PACE Analytical Laboratory for analysis of cadmium, arsenic, lead and zinc. The laboratory was instructed to grind the entire sample prior to analyses. Results are compared to the consensus-based sediment quality guidelines developed for the site (CBG). Historical values for all samples collected by the Respondents are presented in Table 1. The laboratory reports for the current sampling events are included in Attachment 1.

The current sample results with a comparison with three previous sample events are shown below. Values above the CBG are in red font.

	Sample ID	Date	Arsenic (mg/kg)	Cadmium (mg/kg)	Lead (mg/kg)	Zinc (mg/kg)
Upstream	SD-20	March 2011	38.6	4.6	57.4	500
	SD-23	August 2011	20.3	< 2.7	44.5	612
	SD-26	March 2012	78.3	4.9	75.2	766
	SD-29	August 2012	20.8	3.6	45.6	489
	SD-32	February 2013	44.6	< 2.4	33.6	538
Midstream	SD-19	March 2011	31.9	6.1	36.4	343
	SD-22	August 2011	10	< 1.1	42.1	596
	SD-25	March 2012	5.9	< 0.55	13.7	41.3
	SD-28	August 2012	20	3.3	35.2	463
	SD-31	February 2013	28.3	8.1	131	695
Downstream	SD-18	March 2011	47.2	6.1	61.4	475
	SD-21	August 2011	12.1	< 0.89	13.3	280
	SD-24	March 2012	< 5.1	< 2.5	13.8	93.5
	SD-27	August 2012	20.7	3.7	50.7	611
	SD-30	February 2013	46.8	< 5.0	49.4	589
Consensus Based Guideline			33	4.98	128	459

Analytical Summary

Upstream: The concentration of zinc and arsenic was detected above the CBG in the upstream catchment segment while the cadmium and lead concentrations were detected below the CBG.

Between: The concentration of zinc, cadmium, and lead was detected above the CBG in the midstream catchment segment while the arsenic concentration was detected below the CBG.

Downstream: The concentration of zinc and arsenic was detected above the CBG in the downstream catchment segment while the cadmium and lead concentrations were detected below the CBG.

Analyses of all results show the average of all values are below the consensus-based sediment quality guidelines for the site and are displayed in Table 1.

The CDS appears to be functioning as designed to catch sediment traveling downstream in Drum Creek. We will continue to monitor the sediment accumulation as part of the periodic inspection and maintenance of the CDS.

Sincerely,

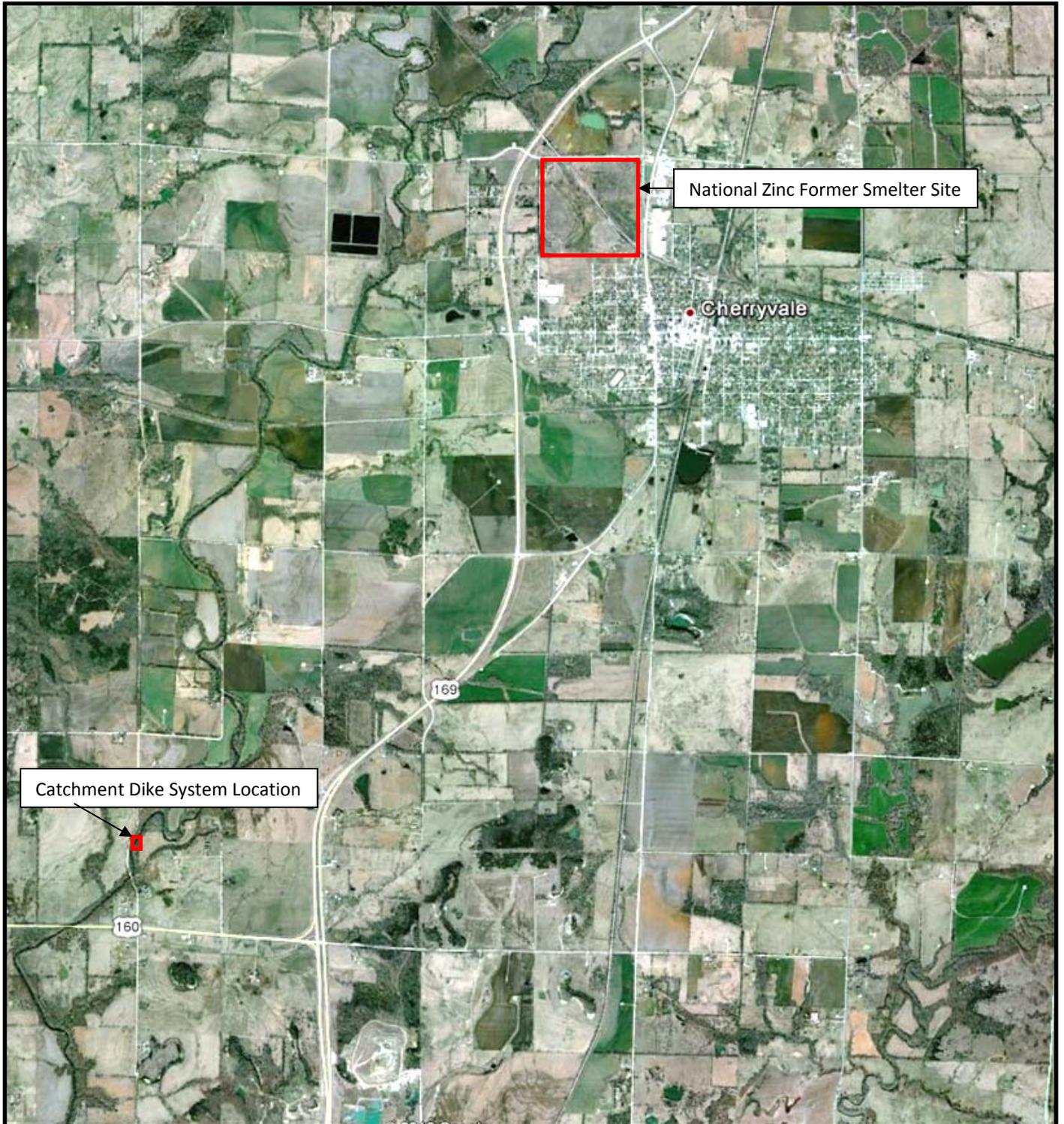


Mark Landress P.G. Kansas Licensed Geologist No. 793
Project Navigator, Ltd.

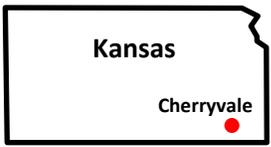
Attachment

Cc: William C. Anderson, Doerner, Saunders, Daniel & Anderson, L.L.P.
Jeffrey L. Rey, United States Steel Corporation
Mark Rupnow, United States Steel Corporation
Andrew G. Thiros, United States Steel Corporation
Mike Stoub, ENTACT
Philip Jen, PNL

FIGURES



0 ft 10,000 ft



Drum Creek Catchment Dike Sediment Sampling Cherryvale, KS

Figure 1. Location Map



Figure 2

Drum Creek Catchment Sample Locations

February 2013

Schematic layout of sample locations and accumulated sediment, Drum Creek Catchment, Montgomery County, KS

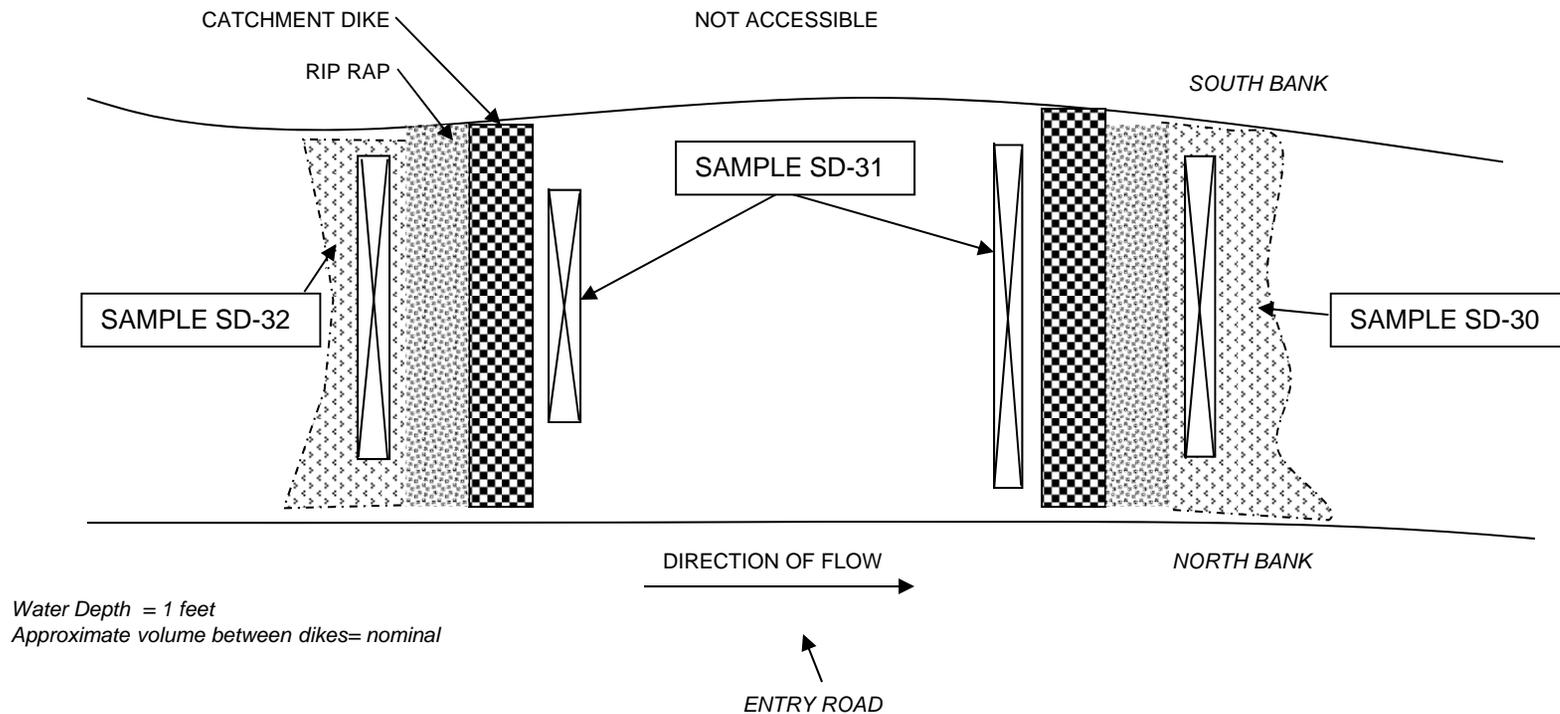
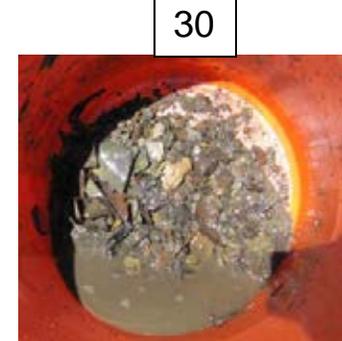
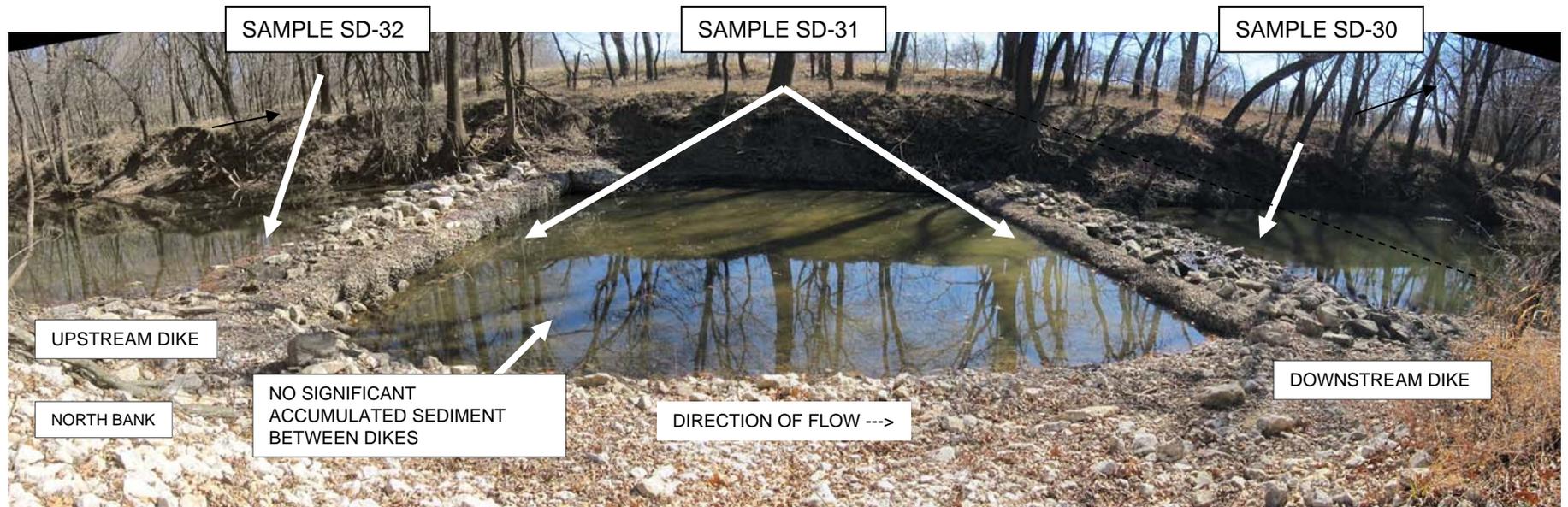


Figure 3 Drum Creek Catchment Sample Locations February 2013



TABLES

TABLE 1

Drum Creek Catchment Sediment Sample Result Summary
Former National Zinc Smelter Site
Cherryvale, Kansas
Respondent's Sampling

Consensus Based Result Limit (ppm)

33	4.98	128	459
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Sample Location	Sample ID	Date	Arsenic	Cadmium	Lead	Zinc	Note
Upstream of Dikes	NS	8/1/2007					Not Sampled
Upstream of Dikes	NS	10/24/2007					Not Sampled
Upstream of Dikes	NS	2/14/2008					Not Sampled
Upstream of Dikes	SD-006-01	9/24/2008	17.5	2.2	23.3	332	Periodic Sample
Upstream of Dikes	SD-008	2/26/2009	37.7	0.94	42.4	487	Periodic Sample
Upstream of Dikes	SD-011	9/3/2009	41.1	5	54.6	499	Periodic Sample
Upstream of Dikes	SD-012	3/17/2010	27	2.8	62.4	678	Periodic Sample
Upstream of Dikes	SD-17	10/11/2010	36.5	2.5	55.6	477.0	Periodic Sample
Upstream of Dikes	SD-20	3/29/2011	38.6	4.6	57.4	500.0	Periodic Sample
Upstream of Dikes	SD-23	8/3/2011	20.3	2.7	44.5	612	Periodic Sample
Upstream of Dikes	SD-26	3/9/2012	78.3	4.9	75.2	766	Periodic Sample
Upstream of Dikes	SD-29	8/28/2012	20.8	3.6	45.6	489	Periodic Sample
Upstream of Dikes	SD-32	2/19/2013	44.6	ND	33.6	538	Periodic Sample

Sample Location	Sample ID	Date	Arsenic	Cadmium	Lead	Zinc	Note
Between Dikes	NS	8/1/2007					Not Sampled
Between Dikes	NS	10/24/2007					Not Sampled
Between Dikes	NS	2/14/2008					Not Sampled
Between Dikes	SD-005-01	9/24/2008	10	0.93	15.9	45.2	Periodic Sample
Between Dikes	NS	2/26/2009					Not Sampled
Between Dikes	SD-010	9/3/2009	28.4	5.7	34.9	376	Periodic Sample
Between Dikes	SD-013	3/17/2010	35.1	3.1	66.1	695	Periodic Sample
Between Dikes	SD-16	10/11/2010	26.2	1.2	24.4	273.0	Periodic Sample
Between Dikes	SD-19	3/29/2011	31.9	6.1	36.4	343.0	Periodic Sample
Between Dikes	SD-22	8/3/2011	10.0	1.1	42.1	596	Periodic Sample
Between Dikes	SD-25	3/9/2012	5.9	0.55	13.7	41.3	Periodic Sample
Between Dikes	SD-28	8/28/2012	20	3.3	35.2	463	Periodic Sample
Between Dikes	SD-31	2/19/2013	28.3	8.1	131	695	Periodic Sample

Sample Location	Sample ID	Date	Arsenic	Cadmium	Lead	Zinc	Note
Downstream of Dikes	SD-001	8/1/2007	9.9	2.1	15.4	155	Baseline
Downstream of Dikes	SD-002	10/24/2007	14	5.6	35.1	508	Initial post remedial
Downstream of Dikes	SD-003-1	2/14/2008	22.4	3.4	40	318	Periodic Sample
Downstream of Dikes	SD-004-01	9/24/2008	9.6	1	16.6	108	Periodic Sample
Downstream of Dikes	SD-007	2/26/2009	14	6.2	40.5	414	Periodic Sample
Downstream of Dikes	SD-009	9/3/2009	38.8	4.8	65.4	533	Periodic Sample
Downstream of Dikes	SD-014	3/17/2010	19.3	3	36.6	511	Periodic Sample
Downstream of Dikes	SD-15	10/11/2010	51.6	5.1	57.7	915	Periodic Sample
Downstream of Dikes	SD-18	3/29/2011	47.2	6.1	61.4	475	Periodic Sample
Downstream of Dikes	SD-21	8/3/2011	12.1	0.9	13.3	280	Periodic Sample
Downstream of Dikes	SD-24	3/9/2012	5.1	2.5	13.8	93.5	Periodic Sample
Downstream of Dikes	SD-27	8/28/2012	20.7	3.7	50.7	611	Periodic Sample
Downstream of Dikes	SD-30	2/19/2013	46.8	ND	49.4	589	Periodic Sample

NS = No Sample

Italics = result at or below detection limit

All results mg/kg (ppm)

Bold - Above PEC

Consensus Based Result Limit PEC (ppm)

Consensus Limit ppm

33	4.98	128	459
Arsenic	Cadmium	Lead	Zinc

Total Project Average

27.2	3.5	43.4	450.5
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Pre Remedial

Sample Location	Sample ID	Date	Arsenic	Cadmium	Lead	Zinc	Note
5100 Bridge	5100 Bridge	11/22/2005	61.35	7.5	50.2	755	Pre Remediation
4200 Road Bridge	4200 Road Bridge	11/22/2005	33.9	4.72	46	459	Pre Remediation
low water crossing	S17-D10	6/24/2003	18.5	14.3	48.2	517	Pre Remediation

ATTACHMENTS

March 05, 2013

Mark Landress
Project Navigator, Ltd.
10497 Town and Country Way
Suite 830
Houston, TX 77024

RE: Project: NATIONAL ZINC CATCHMENT
Pace Project No.: 60139145

Dear Mark Landress:

Enclosed are the analytical results for sample(s) received by the laboratory on February 21, 2013. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Jamie Church

jamie.church@pacelabs.com
Project Manager

Enclosures

cc: Philip Jen, Project Navigator, Ltd.



REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: NATIONAL ZINC CATCHMENT

Pace Project No.: 60139145

Kansas Certification IDs

9608 Loiret Boulevard, Lenexa, KS 66219

A2LA Certification #: 2456.01

Arkansas Certification #: 12-019-0

Illinois Certification #: 002885

Iowa Certification #: 118

Kansas/NELAP Certification #: E-10116

Louisiana Certification #: 03055

Nevada Certification #: KS000212008A

Oklahoma Certification #: 9205/9935

Texas Certification #: T104704407-12-3

Utah Certification #: KS000212012-2

Illinois Certification #: 003097

REPORT OF LABORATORY ANALYSIS

SAMPLE SUMMARY

Project: NATIONAL ZINC CATCHMENT

Pace Project No.: 60139145

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60139145001	SD 30	Solid	02/19/13 12:00	02/21/13 09:00
60139145002	SD 31	Solid	02/19/13 12:00	02/21/13 09:00
60139145003	SD 32	Solid	02/19/13 12:00	02/21/13 09:00

REPORT OF LABORATORY ANALYSIS

Page 3 of 11

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SAMPLE ANALYTE COUNT

Project: NATIONAL ZINC CATCHMENT

Pace Project No.: 60139145

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60139145001	SD 30	EPA 6010	TJT	4	PASI-K
		ASTM D2974	DWC	1	PASI-K
60139145002	SD 31	EPA 6010	TJT	4	PASI-K
		ASTM D2974	DWC	1	PASI-K
60139145003	SD 32	EPA 6010	TJT	4	PASI-K
		ASTM D2974	DWC	1	PASI-K

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: NATIONAL ZINC CATCHMENT

Pace Project No.: 60139145

Sample: SD 30 **Lab ID: 60139145001** Collected: 02/19/13 12:00 Received: 02/21/13 09:00 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP		Analytical Method: EPA 6010 Preparation Method: EPA 3050						
Arsenic	46.8	mg/kg	0.99	1	02/27/13 12:30	03/01/13 10:49	7440-38-2	
Cadmium	ND	mg/kg	5.0	10	02/27/13 12:30	03/05/13 13:15	7440-43-9	
Lead	49.4	mg/kg	5.0	10	02/27/13 12:30	03/05/13 13:15	7439-92-1	
Zinc	589	mg/kg	99.4	10	02/27/13 12:30	03/05/13 13:15	7440-66-6	
Percent Moisture		Analytical Method: ASTM D2974						
Percent Moisture	22.0	%	0.50	1		02/27/13 00:00		

ANALYTICAL RESULTS

Project: NATIONAL ZINC CATCHMENT

Pace Project No.: 60139145

Sample: SD 31 **Lab ID: 60139145002** Collected: 02/19/13 12:00 Received: 02/21/13 09:00 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP		Analytical Method: EPA 6010 Preparation Method: EPA 3050						
Arsenic	28.3	mg/kg	1.1	1	02/27/13 12:30	03/01/13 10:51	7440-38-2	
Cadmium	8.1	mg/kg	2.6	5	02/27/13 12:30	03/05/13 11:59	7440-43-9	
Lead	131	mg/kg	2.6	5	02/27/13 12:30	03/05/13 11:59	7439-92-1	
Zinc	695	mg/kg	52.9	5	02/27/13 12:30	03/05/13 11:59	7440-66-6	
Percent Moisture		Analytical Method: ASTM D2974						
Percent Moisture	23.2	%	0.50	1		02/27/13 00:00		

ANALYTICAL RESULTS

Project: NATIONAL ZINC CATCHMENT

Pace Project No.: 60139145

Sample: SD 32 **Lab ID: 60139145003** Collected: 02/19/13 12:00 Received: 02/21/13 09:00 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP		Analytical Method: EPA 6010 Preparation Method: EPA 3050						
Arsenic	44.6	mg/kg	0.98	1	02/27/13 12:30	03/01/13 10:53	7440-38-2	
Cadmium	ND	mg/kg	2.4	5	02/27/13 12:30	03/05/13 12:02	7440-43-9	D3
Lead	33.6	mg/kg	2.4	5	02/27/13 12:30	03/05/13 12:02	7439-92-1	
Zinc	538	mg/kg	48.8	5	02/27/13 12:30	03/05/13 12:02	7440-66-6	
Percent Moisture		Analytical Method: ASTM D2974						
Percent Moisture	15.2	%	0.50	1		02/27/13 00:00		

QUALITY CONTROL DATA

Project: NATIONAL ZINC CATCHMENT

Pace Project No.: 60139145

QC Batch: MPRP/21665 Analysis Method: EPA 6010
QC Batch Method: EPA 3050 Analysis Description: 6010 MET
Associated Lab Samples: 60139145001, 60139145002, 60139145003

METHOD BLANK: 1145270 Matrix: Solid

Associated Lab Samples: 60139145001, 60139145002, 60139145003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Arsenic	mg/kg	ND	1.0	03/01/13 09:57	
Cadmium	mg/kg	ND	0.50	03/01/13 09:57	
Lead	mg/kg	ND	0.50	03/01/13 09:57	
Zinc	mg/kg	ND	10.0	03/01/13 09:57	

LABORATORY CONTROL SAMPLE: 1145271

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/kg	50	50.6	101	80-120	
Cadmium	mg/kg	50	48.5	97	80-120	
Lead	mg/kg	50	49.9	100	80-120	
Zinc	mg/kg	50	50.5	101	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1145272 1145273

Parameter	Units	60139066001		MSD		MS		MSD		% Rec Limits	Max RPD	Qual
		Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec				
Arsenic	mg/kg	16.8	50.9	52.6	57.0	59.6	79	81	75-125	4	20	
Cadmium	mg/kg	ND	50.9	52.6	46.8	47.4	91	90	75-125	1	20	
Lead	mg/kg	56.3	50.9	52.6	76.1	78.3	39	42	75-125	3	20 M1	
Zinc	mg/kg	49.3	50.9	52.6	97.6	101	95	98	75-125	3	20	

QUALIFIERS

Project: NATIONAL ZINC CATCHMENT

Pace Project No.: 60139145

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content.

ND - Not Detected at or above adjusted reporting limit.

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PRL - Pace Reporting Limit.

RL - Reporting Limit.

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

LABORATORIES

PASI-K Pace Analytical Services - Kansas City

ANALYTE QUALIFIERS

D3 Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

M1 Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: NATIONAL ZINC CATCHMENT

Pace Project No.: 60139145

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60139145001	SD 30	EPA 3050	MPRP/21665	EPA 6010	ICP/17392
60139145002	SD 31	EPA 3050	MPRP/21665	EPA 6010	ICP/17392
60139145003	SD 32	EPA 3050	MPRP/21665	EPA 6010	ICP/17392
60139145001	SD 30	ASTM D2974	PMST/8311		
60139145002	SD 31	ASTM D2974	PMST/8311		
60139145003	SD 32	ASTM D2974	PMST/8311		



Sample Condition Upon Receipt

WO# : 60139145

60139145

Client Name: Project Navigator

Courier: Fed Ex UPS USPS Client Commercial Pace Other

Tracking #: 9540 7504 5094 Pace Shipping Label Used? Yes No

Custody Seal on Cooler/Box Present: Yes No Seals intact: Yes No

Packing Material: Bubble Wrap Bubble Bags Foam None Other

Thermometer Used: T-112 / T-194 Type of Ice: Wet Blue None Samples received on ice, cooling process has begun.
(circle one)

Cooler Temperature: 4.0

Optional
Proj Due Date:
Proj Name:

Date and initials of person examining contents: Jan 2/22/13

Temperature should be above freezing to 6°C

Chain of Custody present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.	
Chain of Custody filled out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.	
Chain of Custody relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.	
Sampler name & signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.	
Samples arrived within holding time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5.	
Short Hold Time analyses (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	6.	
Rush Turn Around Time requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	7.	
Sufficient volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	8.	
Correct containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	9.	
Pace containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Containers intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.	
Unpreserved 5035A soils frozen w/in 48hrs?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	11.	
Filtered volume received for dissolved tests?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	12.	
Sample labels match COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	13.	
Includes date/time/ID/analyses Matrix: <u>SC</u>			
All containers needing preservation have been checked.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.	
All containers needing preservation are found to be in compliance with EPA recommendation.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Exceptions: VOA, coliform, TOC, O&G, WI-DRO (water), Phenolics	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Initial when completed	Lot # of added preservative
Trip Blank present:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	15.	
Pace Trip Blank lot # (if purchased):		16.	
Headspace in VOA vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	17. List State: <u>KS</u>	

Client Notification/ Resolution: Copy COC to Client? Y / N Field Data Required? Y / N

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: _____ Date: _____