EP-DIR-AP-10020, R.0

DOCUMENT DEVELOPMENT FOR ENVIRONMENTAL PROGRAMS

Effective Date: 2/6/14

Procedure Owner:	Signature:	Date:
Saundra Martinez	/s/ Saundra Martinez	2/6/14

REVISION HISTORY

Document No./ Revision No.	Issue Date	Action	Description
EP-DIR-AP-10020, R0	2/6/14	New document number and major revision	This procedure supersedes SOP-4006, Document Development and Deliverables Compliance Process. This procedure defines the process for the development of documents generated by Environmental Programs Directorate organizations. Removed three attachments and incorporated the content into the body of the procedure. Added information on DOE's participation in the decision peer review process; processing communication record forms; tracking deliverables; and determining documents that are not sent to the Electronic Public Reading Room.

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1. PURPOSE AND SCOPE

This procedure describes the process for producing documents prepared by the Los Alamos National Laboratory (LANL or the Laboratory) Environmental Programs (EP) Directorate and other LANL organizations when requested. Documents include regulatory reports and correspondence to the New Mexico Environment Department (NMED), the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA), and local and tribal governments as well as posters, presentations, and procedures. The complete process includes planning, scheduling, tracking, developing, editing, formatting, reviewing, signing, controlling versions, producing, submitting, and distributing documents. The deliverables compliance manager reports monthly and fiscal year document data to EP management. A flow chart of the process is included in section 8.

2. **REFERENCES**

EP-DIR-DI-10065, Requirements for Map Layout and Design
EP-DIR-AP-10070, Peer Review of Environmental Program Documents
EP-DIR-AP-10001, ADEP Document Control
EP-DIR-AP-10002, Correspondence Control and Action Tracking
EP-DIR-AP-10003, Records Management Procedure for ADEP Employees
EP-DIR-AP-10006, Formalizing Communications with Regulators
EP-DIR-AP-10007, ADEP Procedure Preparation, Revision, Review, Approval, and Use
EP-DIV-AP-20001, The Deliverables Tracking Database Process
EP-DIV-SOP-20145, Requesting and Managing Data Sets
ENV-CP-SOP-5229, Developing Data Quality Objectives

3. PRECAUTIONS

The project manager/author is ultimately responsible for the document's quality and schedule and for getting required approvals; however, an author designated by the project manager may take on some of the document responsibilities. The project manager/author and the deliverables compliance manager must work together to complete the process.

3. PRECAUTIONS (continued)

One type of peer review, the decision peer review, must be conducted before document preparation or at a key decision phase. DOE representatives **MUST** be included in the decision peer review for documents that will be submitted to NMED, EPA, or DOE to ensure the benefits of early participation are captured and documented in a communication record.

In the formal peer review, the 95% draft of the document is used. See EP-DIR-AP-10070, Peer Review of Environmental Programs Documents, and note that formal peer review is coordinated only by the deliverables compliance manager.

Per EP-DIR-AP-10006, communication records are processed through the deliverables compliance team because the information therein may affect regulatory due dates, commitments, submittals, and project scope. Communication records formalize any regulatory communications with federal, state, local, and tribal agencies, including key communications with other LANL organizations.

Generally the compositor maintains the master electronic document files. However, the compositor may turn the files over to the author to incorporate peer review comments or to revise the document if the changes are extensive.

The online Review & Approval System for Scientific and Technical Information (RASSTI) may take less than a day to assign a Los Alamos Unlimited Release (LA-UR) number; however, the responsible line manager must approve the request for LA-UR before the deliverables compliance manager receives it.

NMED must approve outlines that vary from those prescribed in the Compliance Order on Consent (Consent Order), available at http://www.pmeny.gtate.pm.us/HWR/documents/LANL_Consent_Order_MODIFIED_4_20_2012_pd

http://www.nmenv.state.nm.us/HWB/documents/LANL_Consent_Order_MODIFIED_4-20-2012.pdf.

A certification page and an engineering stamp are required for remedy completion reports and closure reports submitted to NMED. For documents prepared under the EPA Individual Permit (IP), certification statements are required for completion of corrective actions and installation of enhanced controls. The requirements for documents prepared under the IP are available at http://www.lanl.gov/community-environmental-stewardship/protection/compliance/individual-permit-stormwater/documents.php.

A document due on the weekend or on a holiday Monday shall be delivered the previous Friday. The project manager must identify if the document is to be delivered to external parties (e.g., local governments, EPA) at the same time it is delivered to the administrative authority and/or regulator.

3. PRECAUTIONS (continued)

The assignment of the document catalog number (EP201x-xxxx) by the deliverables compliance manager to documents prepared by EP initiates the document development process. The EP Records Processing Facility (RPF) does not issue ER ID numbers for documents that have not yet been written, except under special circumstances. The submittal of a final document and the receipt of an ER ID number signify the end of the document process.

4. EQUIPMENT AND TOOLS

Use this procedure as a checklist and use the following tools for document development, available at http://int.lanl.gov/org/padcap/adep/regulatory_management/regulatory-support-and-performance/requirements-and-deliverables/writing.shtml.

- Document services request form (Attachment 1)
- Signature/approval form (generated when an EP document catalog number is requested)
- EP-DIR-DI-10065, Requirements for Map Layout and Design
- Editing and compositing manual (2012 update)
- Writing resources
 - Checklists
 - Templates
 - Acronyms and abbreviations list
 - List of references with ER IDs
 - Technical area descriptions

5. **RESPONSIBILITIES**

5.1 <u>Project Manager</u>

• Determines the document type and assesses available information to develop the document, such as historical information that is found by searching the Potential Release Site Database, previous submittals to NMED or any other administrative authority, Consent Order and IP requirements, and/or data or maps.

5.1 <u>Project Manager (continued)</u>

• Gives the deliverables compliance manager adequate notice (at least 1 month depending upon document size and due date), and fills out the online document services request form (Attachment 1) for all document-related requests. If a document does not require editing or compositing, see section 6.2.

The document services request form is available at <u>http://int.lanl.gov/org/padcap/adep/regulatory_management/regulatory-support-and-performance/requirements-and-deliverables/writing.shtml</u>.

- Meets with subject matter experts, deliverables compliance manager, editor, compositor, and subcontractor to (1) set a realistic schedule to complete the document by the specified time; (2) determine the resources needed (e.g., geographic information system [GIS], data, illustration); and (3) estimate the time required to complete the document before the due date.
- Develops a schedule that includes deadlines for writing assignments, reviews, comment incorporation, final draft submission, final editing and composition, and signatures. Emails schedule to staff working on the document. Communicates any changes in document logistics to the deliverables compliance manager.
- Asks the deliverables compliance manager for an earlier version or sample of a specific document type to follow.
- Consults with the data and GIS teams about data and map/figure requirements and requests the GIS specialist prepare new maps, as necessary. Requests the necessary data for the document from the data steward. The data may also be requested by the subcontractor.
- Uses ENV-CP-SOP-5229 for all documents that propose an environmental sampling campaign.

NOTE: This procedure is controlled by ADESH Environmental Protection.

• Schedules a decision peer review per procedure EP-DIR-AP-10070, Peer Review of Environmental Programs Documents. DOE counterparts **MUST** be included in the decision peer review, the formal peer review, and any key decision phases.

5.2 **Deliverables Compliance Manager**

Assigns EP document catalog numbers. This number is unique to EP and signifies the • start of the document process.

0

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- Assigns an EP document catalog number to the submittal letter and to an individual • document deliverable. Multiple documents of the same type will each have an EP number and an LA-UR number (e.g., periodic monitoring reports or IP certifications of completion).
- Assigns editor and compositor resources to the document and gives each a copy of the • document services request form.
- Adds document(s) to the deliverables compliance schedule. This schedule is maintained • by the deliverables compliance manager and tracks new and known deliverables including notifications, deliverables completed, due dates, signature dates, completion dates, and metadata on staff resources, peer review, LA-UR number, and EP and ER ID numbers.

NOTE: The deliverables tracking database (DTDB) is the official EP database for tracking deliverables to regulatory authority.

- For very large or complex documents with several authors, sets up an electronic collaboration site or a method other than email for file transfer.
- Obtains LA-UR numbers, delivers documents to regulatory authorities and customers, and distributes final documents.

5.3 Author

- Obtains templates as guides and coordinates resources for drafting 95% draft. •
- Must follow Laboratory and DOE publication policies and must contact the deliverables compliance manager if questions arise.

NOTE: Authors must obtain written approval to use copyrighted material. Referenced materials cited in documents that are not already in the EP Master Reference Set, including books, must be provided to NMED. Authors can contact the deliverables compliance manager who will coordinate with the LANL Research Library to verify the appropriate copyright use for journal articles, books, or other referenced materials. Authors can also contact the deliverables compliance manager to obtain ER IDs.

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5.3 <u>Author (continued)</u>

• Ensures the schedule is followed and adjusted as necessary and reports progress and any issues that may arise to the project manager and the deliverables compliance manager.

6. STEP-BY-STEP PROCESS DESCRIPTION

6.1 **Preparing Drafts for Review**

Project Manager/Author

- [1] Determines the subject matter experts to draft the document.
- [2] Assigns sections and due dates to subject matter experts if more than one author is working on the document.
- [3] Reviews completed sections and provides feedback to the author(s) or subcontractor.
- [4] Receives 95% peer review draft from the in-house authors or subcontractor.

NOTE: Subcontractor staff preparing the draft for peer review must use current templates, follow the current editing and compositing manual, and use the tools listed in section 4. Subcontractor staff must also fill out, sign, and return the subcontractor checklist (refer to Part 1 of Attachment 2) when they submit one hard copy and one electronic file of the 95% peer review draft to the deliverables compliance manager.

Existing templates are available at

http://int.lanl.gov/org/padcap/adep/regulatory_management/regulatory-support-and-performance/requirements-and-deliverables/writing.shtml.

- [5] Coordinates file transfer with the deliverables compliance manager and the compositor.
- [6] Submits electronic Microsoft Word files of the document, including tables and figures. Submits source files for maps (i.e., Adobe Illustrator or Acrobat) for archiving, and submits any other files needed for delivery to the administrative authority (e.g., data files).

NOTE: These files are now the master files, and any changes must be coordinated through the assigned compositor or editor.

[7] Requests the reporting data set per EP-DIV-SOP-20145, Requesting and Managing Data Sets (reporting data sets are provided to the report teams by the data steward).

6.1 <u>Preparing Drafts for Review (continued)</u>

- [8] Requests base maps from GIS team member.
- [9] Ensures that the assigned data steward has provided the final data set and that the GIS team member validates the spatial data.

Editor and/or Compositor

[10] Sets up electronic folders and discusses document particulars.

Editor and/or Subcontractor

- [11] Edits before peer review if the project manager/author requests and if time permits. Resolves queries with the project manager/author, and informs the compositor when edited pieces are ready to format.
- [12] Uses the editing and compositing manual and editing checklist available at http://int.lanl.gov/org/padcap/adep/regulatory_management/regulatory-support-and-performance/requirements-and-deliverables/writing.shtml.

Compositor and/or Subcontractor

[13] Compiles and formats the peer review draft according to the current manual and composition checklist, available at <u>http://int.lanl.gov/org/padcap/adep/regulatory_management/regulatory-support-andperformance/requirements-and-deliverables/writing.shtml</u>. Informs the deliverables compliance manager when the file(s) are ready for peer review.

NOTE: For large documents, the subcontractor must deliver a CD with a copy of the document to the deliverables compliance manager or the subcontractor technical representative (STR). LANL File Transfer is also available to upload a large document for internal and external reviewers.

Deliverables Compliance Manager

[14] Fills out the online Technical Information Release (TIR) form and submits for signature/review process via the online RASSTI. Project managers request, and indicate on the document service request form, whether the document needs an LA-UR number. LA-UR numbers are required for all documents including attachments to letters, intended for external distribution.

6.1 <u>Preparing Draft for Review (continued)</u>

NOTE: The online RASSTI process is available at <u>https://weblogin.lanl.gov/login.php?referer=http://review.lanl.gov/</u>. Designated Unclassified Subject Areas (DUSAs) are defined areas of Laboratory work that are in potentially classified subject areas but are known neither to use nor to generate classified information and are, as defined, unclassified. Project managers are responsible for determining the type of DUSA appropriate for the document.

[15] Obtains review by Derivative Classifier (DC). See list of DC reviewers at <u>http://int.lanl.gov/org/padcap/adep/regulatory_management/regulatory-support-and-performance/requirements-and-deliverables/writing.shtml</u>.

NOTE: Using RASSTI may take less than an hour, depending on how quickly the Responsible Line Manager approves the request, and the deliverables compliance manager receives it.

[16] Enters the LA-UR number in the tracking schedule. Laboratory classification emails the LA-UR number to individual who initiated the online DUSA request as well as the Responsible Line Manager.

6.2 Preparing Documents That May Require ONLY Peer Review

Examples of documents that are peer reviewed but not edited and composited include waste characterization forms, maps, drawings, and safety and security plans and reports.

Project Manager/Author

[1] Fills out the document services request form and requests peer review only.

Deliverables Compliance Manager

- [2] Assigns a document catalog number.
- [3] Emails the document catalog signature form to the requestor.
- [4] Coordinates the peer review.

6.2 <u>Preparing Documents That May Require ONLY Peer Review (continued)</u>

Project Manager/Author

- [5] Allows appropriate time for review and reconciling and incorporating comments.
- [6] Finalizes the document and obtains required signatures on title page of document, as appropriate.
- [7] Prints a copy of the document catalog signature form.

NOTE: For documents with their own signature pages, the document catalog signature form will indicate "approval signatures on final document."

[8] Attaches the document catalog signature form to the final document and emails complete document to deliverables compliance manager.

6.3 <u>Review Process</u>

Project Manager/Author

[1] Requests peer review on the document services request form in accordance with EP-DIR-AP-10070, Peer Review of Environmental Program Documents.

NOTE: Most documents go through the peer review and comment resolution process. The length of this review process depends on the length and complexity of the document. Should allow at least 2 weeks for final editing and composition and for obtaining signatures.

- [2] Returns the document to the editor for final editing once peer review comments have been addressed and incorporated.
- [3] Returns completed, signed peer review comment forms to the deliverables compliance manager.

6.4 <u>Using the Accelerated Approach</u>

Documents that have a shorter schedule for completion follow the accelerated approach.

Some examples include 30- and 45-day responses to the regulator and revisions, including approvals with modifications and/or direction and replacement pages.

6.4 <u>Using the Accelerated Approach (continued)</u>

Project Manager/Author

[1] Submits a document services request form indicating the need for a modified peer review (shorter review time and fewer reviewers) for a document going through the accelerated process.

Deliverables Compliance Manager

[2] Requests a new classification review to obtain an LA-UR number; submits the document for a modified peer review with regulatory compliance, legal, ENV-RCRA (waste), and DOE.

NOTE 1: For major changes, such as revisions or replacement pages: The document is reissued in its entirety as a "Revision 1" because the content has changed significantly.

NOTE 2: For minor changes, such as correcting grammar or spelling; renumbering sections, pages, or attachments; or changes that do not affect content, the document does not require the same level of review and approval as the original.

6.5 <u>Preparing the Submittal Letter</u>

Deliverables Compliance Manager

[1] Emails the submittal letter template to the project manager to modify content and to update the standard distribution list, as appropriate.

Project Manager

- [2] Reviews the draft letter and includes any relevant information regarding the document, including adding to the standard distribution list, indicating additional hard copies to be produced, and indicating if the document proposes future/additional scope or documents.
- [3] Submits the final draft submittal letter to the deliverables compliance manager to edit, finalize, and prepare the blue folder.

6.6 Preparing Final Document

Editor

- [1] Receives final <u>draft</u> of document for editing from the project manager or designee.
- [2] Performs a full edit and works with the project manager or designee to review editorial changes and resolve any queries.

NOTE: Subcontractors preparing documents must use current templates and checklists and follow the current editing and composition manual. See Part 2 of Attachment 2: Subcontractor Checklist. This checklist must be completed, signed, and returned with the final submittal and must be coordinated with the project manager or designees such as the STR.

Compositor

- [3] Receives final edited draft of document from the editor for final composition.
- [4] Prints a final review copy of the document, assembles a complete document (including CD/DVD labels and plates), and provides the document to an editor or compositor not assigned to the document to perform a final document check using the in-house checklist.

NOTE: The final document checklist is available at http://int.lanl.gov/org/padcap/adep/regulatory_management/regulatory-support-and-performance/requirements-and-deliverables/writing.shtml.

- [5] Makes any corrections based on the final document check and reprints pages or entire document depending the extent of the changes.
- [6] Produces final document for project manager/author to approve.

Project Manager/Author

[7] Reviews final and approves by signing the final document checklist indicating the document is complete and ready for production.

6.7 Signature Process

Deliverables Compliance Manager

[1] Assembles blue folder with the submittal letter, document(s), and the document catalog signature form. The document catalog signature form lists reviewers/approvers who sign vouching that the document(s) meets technical, programmatic, and regulatory requirements.

NOTE: The signature process at EP may take 1–3 days. DOE requires a mandatory 2 days to review and sign. At EP and DOE, the signature sign-in sheet must be completed to record when the document was dropped off and picked up to ensure deadlines are met. The EP sign-in sheet indicates when the document must be taken to DOE to meet the 2-day requirement. Some managers have Entrust software allowing them to use "signed and validated" digital signature.

Compositor

[2] Produces final copies.

NOTE 1: For Consent Order deliverables, prepares two copies for NMED, one copy for DOE, and one copy for the project manager at the time of the NMED delivery. The remaining distribution can be completed the next day.

NOTE 2: For DOE, EPA, or other nonregulatory deliverables, prepares one hard copy with electronic files unless otherwise noted on the distribution list or document service request form.

6.8 Submittal of Final Document

Deliverables Compliance Manager

- [1] Ensures documents are delivered as follows, and confirmation of delivery is documented via a date/time stamp.
 - Documents hand-delivered to NMED must be in the form of two hard copies with accompanying CDs/DVDs and the original submittal letter. Correspondence without attachments is hand-delivered in the form of one hard copy. NMED date stamps a copy of the submittal letter to verify the document was received before or on the due date.

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6.8 <u>Submittal of Final Document (continued)</u>

- Documents delivered to DOE must be in the form of two hard copies with accompanying CDs/DVDs and the original submittal letter. DOE date stamps a copy of the submittal letter to verify the document was received before or on the due date.
- Documents are delivered to the EPA via U.S. certified mail in the form of one hard copy with accompanying CD/DVD. The LANL mailroom date stamps a copy of the submittal letter to verify the document was mailed before or on the due date. The domestic return receipt card is filled out and the box checked for certified mail. This green card is sent back to the deliverables compliance manager and verifies that the document was received. The card is scanned and saved.
- Documents for local and tribal governments are faxed, and originals are handdelivered or sent via U.S. mail, as appropriate. If faxed, the confirmation page verifies the document was transmitted. A follow-up telephone call is also made to verify receipt of the fax. If hand-delivered or sent via U.S. mail, a copy of the submittal letter serves as the date stamp to verify delivery.

NOTE: Documents must be taken to the LANL mailroom before 2:00 pm.

[2] Files the electronic copy of the date-stamped letter at p:\nmed_submittals_letters\Date_Stamped Ltrs NMED, DOE, Other.

6.9 Distribution and Archiving

For any document, the compositor completes the distribution indicated on the submittal letter. This distribution includes any additional paper copies and submittal to the RPF, Electronic Public Reading Room (EPRR), Hard Copy Public Reading Room (HPRR), and local governments. **NOTE 1:** Distribution is time sensitive and must be completed immediately (the next day) and electronically to accommodate the EPRR upload, which may take 1–2 days.

NOTE 2: The following documents are <u>NOT</u> submitted to the EPRR or HPRR: air-monitoring reports, spill responses, access agreements, communication records, and internal project plans and reports.

NOTE 3: The distribution checklist is available at http://int.lanl.gov/org/padcap/adep/regulatory_management/regulatory-support-and-performance/requirements-and-deliverables/writing.shtml.

6.9 Distribution and Archiving (continued)

Compositor

[1] Ensures all final document files are in the document folder.

Document Manager or Designee

- [2] Distributes documents according to the distribution list in the submittal letter, and follows the distribution checklist.
- [3] Scans and files all relevant document particulars in the appropriate document folder.

7. RECORDS PROCESSING

Document Manager or Designee

- [1] Submits final records and/or documents to the RPF using (1) the Standard Electronic Transmittal (E-Trans) **OR** (2) to the public reading room using EPRR E-Trans.
- [2] Ensures air-monitoring reports, spill responses, access agreements, communication records, and internal project plans and reports are NOT submitted to the EPRR or HPRR.
- [3] Enters ER ID into the deliverables compliance schedule.

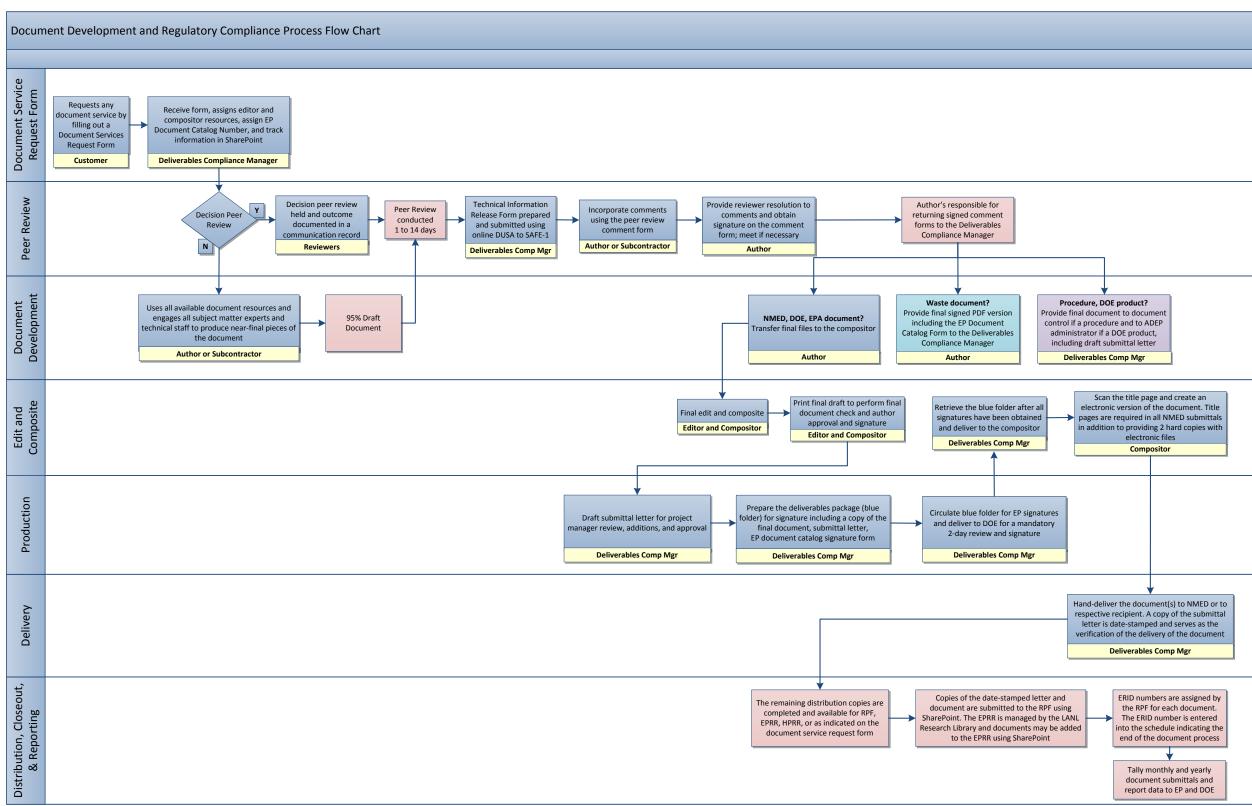
8. FLOW CHART

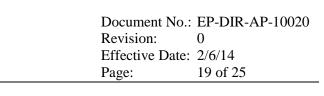
9. ATTACHMENTS

- Attachment 1 Document Services Request Form
- Attachment 2 Subcontractor Document Checklist

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Click here for "Required Read" credit.





<u>Attachment 1</u> Document Services Request Form Page 1 of 1 Document Services Request Form

Request Date:	Project Manager:					
Author/Subcontractor/Phone/Email:						
Document Title: (must be the same as referenced in	the NMED letter)					
Cost Codes:	Document Due Date:					
Service(s) Requested:	Applicable DUSA?					
Peer Review Illustrator	ENVPRO EARTH D&D					
Writer/Editor Production	s, Courier Signature:					
Date for decision peer review:						
Date to be submitted to peer review:	Comments Due:					
Peer Reviewers: (include GIS, Legal, Data, DOE, ENV-RCRA, Reg Compliance, Engineering Reviewers by name)						
Document Size:	-					
Small Medium Large Ir	ncludes Plates: Yes No If Yes, how many:					
Distribution/Other Requirements: (specify distribution	on requirements in comment box below)					
Brief summary of request (include request for extra c	opies):					
Additional Deliverable						
Does this deliverable initiate other deliverables? If yes, please indicate title and due date.						
To be filled out by Document Manager only						
Editor: PR Request						
	on forms: Y/N * Include NMED letter in Peer Review					
EP No: LA-UR #: EP No: LA-UR #:						

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<u>Attachment 2</u> Subcontractor Document Checklist Page 1 of 2

SUBCONTRACTOR DOCUMENT CHECKLIST

Part 1					
DOCUMENT TITLE:					
PROJECT MANAGER:					
SUBMITTED BY:					
SIGNATURE AND DATE:					
DUE TO ADEP:	DUE TO DOE:	DUE TO NMED:			
To be filled out by subcontractor, signed	ed, dated, and provided to the De	liverables Compliance Manager and STR.			
95% PEER REVIEW DRAFT ([1] PA	PER & [1] ELECTRONIC)				
MAIN TEXT					
Cover, executive summary, an	d TOC				
Main text					
Figures	N				
Tables					
Appendixes (including cover p	ages for any included on CD only)				
Plates					
References not in the RPF or	References not in the RPF or the EndNote database				
Map data sources					
OTHER					
NOD response					
Crosswalk table					

<u>Attachment 2</u> Subcontractor Document Checklist Page 2 of 2

SUBCONTRACTOR DOCUMENT CHECKLIST

Part 2	2					
	DOCUMENT TITLE:					
PF	ROJECT MANAGER:					
	SUBMITTED BY:					
SIGN	ATURE AND DATE:					
	Due to ADEP:		Due to DOE:		Due to NMED:	
To be fi	lled out by subcontracto	r, signed, dated, and	provided to the	Deliverables C	ompliance Mana	ger and STR.
FINAL	DOCUMENT (POST-P	EER REVIEW, COM	- MENTS INCOR	PORATED, ELH	ECTRONIC)	
GENE		,		, , , , , , , , , , , , , , , , , , , ,	/	
	The post-peer review d	ocument is complete				
	Peer review comments deliverables compliance	have been incorporate	d, and complete	ed peer review fo	rms have been su	bmitted to the
	The document has been technically correct, and					peer review are
	Callouts within the main (NOTE: callouts must be				ppendixes are cor	rect.
	The document has been edited and formatted according to the requirements of the EP Editing and Compositing Manual and references therein.					
	Acronyms and abbreviations in text, figures, and tables, including in appendixes, have been defined and captured in an acronym list.					
REFE	RENCES					
	New reference informat also be verified (contact		een sent to the [Deliverables Con	npliance Team. Co	pyright use must
	References cited refer t	o the correct documen	t(s).			
	Word fields for references have not been modified (contact editor).					
FIGUE	RES AND PLATES					
	Figures and plates are of	ited, numbered prope	rly, called out in	order, and inclue	ded in the docume	nt.
	The figures and plates s	show what is described	l in text.			
	Map legends are legible	and capture all symbo	ols, including the	e north arrow.		
TABLES						
	Tables are cited, number	ered properly, called or	ut in order, and i	ncluded in the do	ocument.	
	The tables show what is described in text.					
	Tables are formatted co	rrectly, the tables note	s have been ch	ecked, and no ce	ells are blank.	
TABL	TABLE OF CONTENTS					
	Appendix titles are inclu	ded in the TOC and ha	ave been checke	ed against the ap	opendixes.	
	Plate captions are inclu-	ded in the TOC and ca	ptions have bee	n checked agair	ist the plates.	