

Attachment 3

INTERIM MEASURES SCOPE OF WORK

PURPOSE

The purpose of Interim Measures are to identify and correct any actual or potential releases of solid waste, hazardous waste or hazardous constituents from regulated units, solid waste management units, and other sources or areas at the site which may present an endangerment to human health or the environment. Interim Measures shall also be used whenever possible to achieve the initial goals of controlling the migration of contaminated groundwater and controlling current human and ecological exposure to contaminated media.

SCOPE

The Interim Measures consist of several tasks. The level of detail EPA will require in Interim Measures submittals is dependent upon the proposed activities and site conditions.

TASK I: INTERIM MEASURES WORKPLAN

- A. Interim Measures Objectives
- B. Community Relations Plan

TASK II: INTERIM MEASURES INVESTIGATIVE PROGRAM

- A. Data Collection Quality Assurance Plan
- B. Data Management Plan

TASK III: INTERIM MEASURES DESIGN PROGRAM

- A. Design Plans and Specifications
- B. Operation and Maintenance Plan
- C. Project Schedule
- D. Final Design Documents

TASK IV. INTERIM MEASURES CONSTRUCTION QUALITY ASSURANCE PLAN

- A. Construction Quality Assurance Objectives
- B. Inspection Activities
- C. Sampling Requirements
- D. Documentation

TASK V. REPORTS

- A. Interim Measures Workplan
- B. Interim Measures Report

TASK I: INTERIM MEASURES WORKPLAN

Respondent shall prepare an Interim Measures Workplan. The workplan shall include the following:.

A. Interim Measures Objectives

The workplan shall specify the objectives of the interim measures, demonstrate how the interim measures will abate releases and threatened releases, and, to the extent possible, be consistent and integrated with any long term solution at the facility. The Interim Measures Workplan will include:

1. a discussion of the overall management approach;
2. a discussion of the technical approach;
3. a schedule;
4. a description of qualifications of personnel performing or directing the interim measures, including contractor personnel.

B. Community Relations Plan

Respondent shall prepare a plan for the dissemination of information to the public regarding interim measure activities and results. These activities shall include the preparation and distribution of fact sheets and participation in public meetings.

TASK II: INTERIM MEASURES INVESTIGATION PROGRAM

A. Data Collection Quality Assurance Plan

If Respondent has not yet submitted a Quality Assurance Project Plan (“QAPP”) pursuant to the SI, Attachment B, Task II, or if EPA determines that the SI QAPP is not applicable to the Interim Measures, EPA may require Respondent to submit a Data Collection Quality Project Plan in accordance with Attachment B, Task II.B.

B. Data Management Plan

If Respondent has not yet submitted a Data Management Plan pursuant to the SI,

Attachment B, Task II, or if EPA determines that the Data Management Plan is not applicable to the Interim Measures, EPA may require Respondent to submit a Data Management Plan in accordance with Attachment B, Task II.C.

TASK III: INTERIM MEASURES DESIGN PROGRAM

A. Design Plans and Specifications

For some Interim Measures, EPA will require Respondent to develop clear and comprehensive design plans and specifications which include, but are not limited to, the following:

1. Discussion of the design strategy and the design basis.
 - a. short and long-term objectives
 - b. methods to measure achievement of objectives
2. Discussion of the key technical factors including:
 - a. specific design features to meet short- and long-term objectives
 - b. proper management of any hazardous materials
 - c. confirmatory sampling and/or monitoring to assess effectiveness in meeting short- and long-term objectives
3. Description of assumptions made and detailed justification of these assumptions;
4. Detailed drawings of the proposed design

B. Operation and Maintenance Plan

Respondent shall prepare an Operation and Maintenance Plan to cover both implementation and long term maintenance of the interim measure(s). The Operation and Maintenance Plan shall be submitted with the Final Design Documents and shall be composed of the following types of elements:

1. Equipment start-up and operator training:

Respondent shall prepare, and include in the technical specifications governing treatment systems, contractor requirements for providing: appropriate service

visits by experienced personnel to supervise the installation, adjustment, startup, and operation of the treatment systems, and training covering appropriate operational procedures once the startup has been accomplished successfully.

2. Description of normal operation and maintenance (O&M), including:
 - a. Description of tasks for operation;
 - b. Description of tasks for maintenance;
 - c. Schedule showing frequency of each O&M task; and
 - d. Common and/or anticipated remedies.
3. Description of routine monitoring and laboratory testing, including:
 - a. Description of monitoring tasks and laboratory tests;
 - b. Required QA/QC; and
 - c. Schedule of monitoring frequency and date, if appropriate, when monitoring may cease.
4. Description of equipment, including:
 - a. Equipment identification;
 - b. Monitoring components;
 - c. Maintenance of site equipment; and
 - d. Replacement schedule for equipment and monitoring components.
5. Records and reporting mechanisms required, including:
 - a. Daily operating logs;
 - b. Laboratory records;
 - c. Mechanism for reporting emergencies;
 - d. Personnel and maintenance records; and
 - e. Monthly/annual reports to Federal/State agencies.

The Operation and Maintenance Plan shall be submitted with the Final Design Documents.

C. Project Schedule

Respondent shall develop a detailed Project Schedule for construction and implementation of the interim measure(s) which identifies timing for initiation and completion of all critical activities. Respondent shall specifically identify dates for completion of the project and major interim milestones which are enforceable terms of this order. A Project Schedule shall be submitted simultaneously with the Final Design Documents.

D. Final Design Documents

The Final Design Documents shall consist of the Final Design Plans and Specifications (100% complete), the Final Draft Operation and Maintenance Plan, and the Project Schedule. Respondent shall submit the final documents, 100% complete, with reproducible drawings and specifications. The quality of the design documents should be such that Respondent would be able to include them in a bid package and invite contractors to submit bids for the construction project.

TASK IV: INTERIM MEASURES CONSTRUCTION QUALITY ASSURANCE PLAN

A. Construction Quality Assurance Objectives

In the CQA plan, Respondent shall identify and document the objectives and framework for the development of a construction quality assurance program including, but not limited to the following: responsibility and authority; personnel qualifications; inspection activities; sampling requirements; and documentation. The responsibility and authority of all organizations (i.e., technical consultants, construction firms, etc.) and key personnel involved in the construction of the interim measures shall be described fully in the CQA plan. Respondent must identify a CQA officer and the necessary supporting inspection staff.

B. Inspection Activities

The observations and tests that will be used to monitor the construction and/or installation of the components of the interim measure(s) shall be summarized in the CQA plan. The plan shall include the scope and frequency of each type of inspection. Inspections shall verify compliance with all environmental requirements and include, but not be limited to, air quality and emissions monitoring records, waste disposal records (e.g., RCRA transportation manifests), etc. The inspection should also ensure

compliance with all health and safety procedures.

C. Sampling Requirements

The sampling and testing activities, sample size, sample and test locations, frequency of testing, acceptance and rejection criteria, and plans for correcting problems should be presented in the CQA plan.

D. Documentation

Reporting requirements for CQA activities shall be described in detail in the CQA plan. This plan shall include such items as daily summary reports, inspection data sheets, problem identification and interim measures reports, design acceptance reports, and final documentation. Provisions for the final storage of all records shall be presented in the CQA plan.

TASK V: REPORTS

A. Interim Measures Workplan

Respondent shall submit an Interim Measures Workplan as described in this Attachment. The Interim Measures Workplan will include a list of any other required submittals (e.g., Final Design Document, Construction Quality Assurance Plan) and a schedule for submitting them to EPA.

B. Interim Measures Report

At the "completion" of the construction of the project (except for long term operation, maintenance, and monitoring), Respondent shall submit an Interim Measures Report to the Agency. The Report shall document that the project is consistent with the design specifications and that the interim measures are performing adequately. The Report shall include, but not be limited to, the following elements:

1. Synopsis of the interim measures and certification of the design and construction;
2. Explanation of any modifications to the plans and why these were necessary for the project;
3. Listing of the criteria, established before the interim measures were initiated, for judging the functioning of the interim measures and also for explaining any modification to these criteria;

4. Results of facility monitoring, indicating that the interim measures will meet or exceed the performance criteria; and
5. Explanation of the operation and maintenance (including monitoring) to be undertaken at the facility.

This report shall include the inspection summary reports, inspection data sheets, problem identification and corrective reporting data sheets, design engineers' acceptance reports, deviations from design and material specifications (with justifying documentation), and as-built drawings.