

United States Environmental Protection Agency

Statement of Work (SOW)
Navajo Area Uranium Mines
Response, Assessment and Evaluation Services (RAES)

FULL SERVICE (MODULE 1)
AND
CULTURAL RESOURCES SUPPORT
(MODULE 2)
[September 2016]

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I. Introduction

A. Purpose

The purpose of the Navajo Area Uranium Mines Response Assessment and Evaluation Services (RAES) contract is to provide nationally consistent services to the U.S. Environmental Protection Agency (EPA) Remedial Project Managers (RPMs), On-Scene Coordinators (OSCs) and other federal officials implementing EPA's responsibilities for response site activities where the release, or threatened release, of hazardous substances, pollutants or contaminants pose a risk to human health under the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). Services performed under this contract will primarily be performed at uranium mining-related sites that may have an impact on or within the Navajo Nation (within EPA Region 9 in Arizona and New Mexico) and within the Grants Mining District (located in EPA Region 6 New Mexico). The contractor shall be prepared to provide scientific/technical support for EPA activities in furtherance of the agency's primary mission: the protection of human health and the environment. The SOW is described in the Sections below.

For each assigned task, the contractor shall furnish all necessary personnel with appropriate knowledge and expertise, materials, equipment, and services needed for, or incidental to, performing and completing work in accordance with the requirements of this statement of work. The focus of this work is on legacy uranium mines and lands impacted with anthropogenic concentrations of naturally occurring constituents and radionuclides. Services under this contracts may be ordered by EPA Regions 6 or 9.

B. Background

Under the authority of legislation, Presidential Directives, and promulgated regulations, EPA is responsible for protecting human health and the environment. EPA is delegated authority to undertake response actions with respect to the release or threat of release of oil, hazardous substances, or pollutants and contaminants.

The primary hazardous substance on these sites is radiological mine and mine related waste; therefore, a significant knowledge base of radiological material handling, environmental data interpretation, and data collection will be required to perform the activities within this SOW.

The terrain to access site locations is rough, water is scarce and the weather is often extreme in most areas. The trails and/or road to the sites are not improved or maintained. To reach the site locations four wheel drive vehicles (capable of driving over rough dirt/rocky roads) and/or long hiking are necessary. Roads can become impassable in wet weather, and conditions can change quickly.

In summer, site conditions are hot and dry; in winter, elevations make the sites subject to severe cold and high winds. Due to the quick changes in the weather, there is a danger of flash floods. While this danger is greatest during the summer monsoon season (July through September), flash floods can occur at any time of the year.

1. Navajo Area Uranium Mines

The Navajo Nation encompasses more than 27,000 square miles. The unique geology of the region

makes the Navajo Nation rich in uranium, a radioactive ore in high demand after the development of atomic power and weapons at the close of World War II in the 1940s. Approximately four million tons of uranium ore were extracted during mining operations within the Navajo Nation from 1944 to 1986. Many Navajo people worked the mines, often living and raising families in close proximity to the mines and mills.

Uranium mining and milling activities no longer occur on Navajo lands, but the legacy of these activities remains; including more than 500 abandoned uranium mine claims with thousands of mine features such as pits, trenches, holes, etc. Structures and water sources in the area contain elevated levels of uranium, radium and other radionuclides. Uranium and other elements (selenium, arsenic, etc.) associated with mine and mill sites also occur naturally at elevated levels in rock, soil, surface water, and groundwater across the Navajo Nation and the broader Four Corners region. Health effects as a result of exposure to these elements can include lung cancer, bone cancer, and impaired kidney function.

EPA maintains a strong partnership with the Navajo Nation and, since 1994, the Superfund Program has provided technical assistance and funding to assess potentially contaminated sites and develop a response. In August 2007, the Superfund Program compiled the “Abandoned Uranium Mines and the Navajo Nation: Navajo Nation AUM Screening and Assessment Report and Atlas with Geospatial Data” [Comprehensive Database and Atlas](#) which contains assessments of known uranium mines on the Navajo Nation.

In October 2007, at the request of the U.S. House Committee on Oversight and Government Reform, EPA, along with the Bureau of Indian Affairs (BIA), the Nuclear Regulatory Commission (NRC), the Department of Energy (DOE), and the Indian Health Service (IHS) developed a coordinated [Five-Year Plan \(PDF\)](#) to address uranium contamination in consultation with Navajo Nation EPA.

In January 2013, these federal agencies, in consultation with the Navajo Nation, completed a five-year effort to address uranium contamination in the Navajo Nation. The effort focused on the most imminent risks to people living on the Navajo Nation. While the last five years represent a significant start in addressing the legacy of uranium mining, much work remains and the same federal agencies have collaborated to issue a second [Five-Year Plan \(PDF\)](#). The purpose of the second Five-Year Plan is to build on the work of the first plan, make adjustments based on information gained during this period, and plan the next steps in addressing the most significant risks to human health and the environment.

Although the legacy of uranium mining is widespread and will take many years to address completely, the collaborative effort of EPA, other federal agencies and the Navajo Nation will bring an unprecedented level of support and protection for the people at risk from these sites. Much work remains to be done, and EPA is committed to working with the Navajo Nation to remove the most immediate contamination risks and to find permanent solutions to the remaining contamination on Navajo lands.

2. Grants Mining District (Navajo Area Uranium Mines in New Mexico – Non-Tribal Lands)

The Grants Mining District comprises an area of 100 miles by 25 miles that was the primary location of uranium extraction and production activities in New Mexico from the 1950s until late into the 20th century. The Grants Mining District extends along the southern margin of the San Juan basin in

Cibola, McKinley, Sandoval, and Bernalillo counties as well as Tribal lands. Three mining sub-districts located within the Grants Mining District-Ambrosia Lake, Laguna, and Marquez-contain 97 legacy uranium mines with recorded uranium ore production of over 52 million tons outside of the boundaries of the Navajo Nation. During the operational period, many of the larger mines conducted extensive dewatering to access ore below the water table. Most effluent from dewatering received little or no treatment before discharge to the ground or surface drainages during the majority of the mine operational period, causing perennial stream flows in major drainages. The extensive dewatering operations significantly changed areal hydrologic conditions, resulting in continuing influx of oxygenated ground water to areas that were dewatered during the mine operational period. Other environmental impacts may have been caused by erosion and leaching of mine waste materials, some of which were deposited into arroyos where it remains to the present-day, and by the reported operation of on-site heap-leach and stope-leaching operations. Few of the legacy uranium mine sites have undergone surface reclamation, and many have physical hazards that remain such as open adits and shafts, as well as uncontrolled waste rock and ore piles on-site.

II. Technical Requirements (Module 1)

The technical requirements under this SOW include response, assessment, support for time-critical and non-time-critical removal actions, technical support, data management, and training. Exhibit A – Specific Tasks List, identifies tasks that may be performed to satisfy contract requirements. Tasks performed shall be in accordance with applicable statute(s), the NCP, and any other relevant law or regulations. (see Exhibit B – Statutory and Regulatory Framework.). This contract is specifically designed to provide technical support services to EPA at Navajo area uranium mining-related sites located in Regions 6 and 9.

The contractor performing work described in this SOW shall:

- Comply with 48 CFR Part 46; and
- Develop, implement, maintain, and document a quality system that demonstrates conformance to the minimum specifications of EPA CIO 2105 and ANSI/ASQC E4-1994.

The contractor is required to submit a quality management plan (QMP) prepared in accordance with EPA Requirements for Quality Management Plans (QA/R-2), EPA/240/B/01/002, March 2001, which describes the contractor's quality system. The QMP will be approved by the EPA.

For project-specific activities and operations requiring environmental data operations, defined as “any measurement or information that describes environmental processes, location, or condition; ecological or health effects and consequences, or the performance of environmental technology,” the contractor shall develop or perform work under a Quality Assurance Project Plan (QAPP) in accordance with EPA Requirements for Quality Assurance Project Plans (QA/R-5), EPA/240/B/01-003, March 2001.

A. Response Activities

Response activities shall support EPA's obligations under CERCLA, Stafford Act, as well as any future laws or regulations promulgated pertaining to EPA's response obligations.

The contractor shall provide sampling, analytical, field detection/monitoring and Quality Assurance/Quality Control (QA/QC) support, in accordance with applicable methods, procedures and guidelines; document site conditions and compile information and data in a clear and concise manner; conduct data management activities to facilitate documents being readily available for distribution; provide technical advice, findings, facts, and recommendations; suggest technical options and review technical submissions, including work plans for EPA and other federal, state, local, and Tribal officials as directed; and assist with coordination and communication between federal, state, local, tribal responding agencies, and the public.

The contractor shall monitor and oversee response activities, workers, and public safety; and adhere to appropriate safety procedures and advise the OSC/RPM on health and safety matters.

The contractor will be required obtain written access to the properties prior to conducting any field activities. Due to incremental weather, access to the sites may be limited and may require the contractor to delay field work and/or leave equipment on-site, requiring the site be secured. In addition, accessibility to the site locations may be obstructed or limited due to the lack access roads and/or poor road conditions. The contractor may be tasked to perform minimal road construction or

repair as needed for the purpose of accessing a site. The contractor must also comply with the Policy to Assure Competency of Laboratories, Field Sampling, and Other Organizations Generating Environmental Measurement Data under Agency- Funded Acquisitions. The policy can be found at: <http://www.epa.gov/fem/pdfs/fem-lab-competency-policy.pdf>.

The contractor will provide appropriately qualified personnel with the appropriate levels of personal protection equipment (PPE) for each field activity as needed (see Exhibit D – Levels of Personal Protective Equipment); as well as all necessary equipment (excluding EPA owned equipment) in good working condition and trained staff to operate the equipment.

The contractor shall adhere to the requirements regarding EPA’s Background Check and Drug Screening Policy identified in Exhibit F – Levels of Personnel Background Check and Drug Screening for Contractor Employees.

To safeguard the EPA workforce and comply with Homeland Security Presidential Directive 12 (HSPD-12), Executive Order (E.O.) 13467, E.O. 13488 and Office of Personnel Management (OPM) regulations, EPA requires a set of procedures as outlined in Exhibit G, Agency Security Requirements for Contractor Personnel.

1. Removal Assessment

The contractor shall provide technical support to EPA on removal assessment activities; and will perform removal assessment activities in accordance with the NCP and EPA OSWER Directive 9360.3-08, “Superfund Removal Procedures/The Removal Response Decision: Site Discovery to Response Decision” dated September 1994.

A removal assessment focuses on determining the potential immediate threat a site may pose on human health and the environment. The results of this assessment are used by EPA to determine whether a removal action or some other response is warranted.

2. Fund-Lead Removal

The contractor shall provide appropriate technical information that details strategies to mitigate the threat to human health and the environment from hazardous substances; provide EPA with technical support in monitoring on-site activities by federal, state, local agencies, and contractor(s) and provide cost oversight during fund lead removal actions. The contractor shall provide support with documentation per the revised Removal Action Memorandum Guidance (September 2009).

3. Potential Responsible Party (PRP) Responses

The contractor shall be knowledgeable of CERCLA§107, Potentially Responsible Parties (PRP) and Clean Water Act (CWA) (see Exhibit B – Statutory and Regulatory Framework); provide technical and administrative support to EPA for identification and notification of PRPs related to a release on a site or facility (see Exhibit A – Specific Tasks List); assist in preparing PRP objectives for site cleanup and work requirements (see Exhibit A – Specific Tasks List); and review PRP work plans, and monitor work to ensure that the assessment or cleanup activities are performed correctly and in accordance with applicable statute(s), the NCP, and any other relevant law or regulations. (see Exhibit B – Statutory and Regulatory Framework.)

4. Minor Containment

Minor containment responses (non-emergency) require all necessary response actions be completed at the site or temporary stabilization at the site prior to removal assessment. A minor containment

response usually does not exceed 40 hours per assignment. The minor containment is a result of CERCLA 104(b) activities (pre-removal and investigatory activities).

B. Assessment

The primary objective of the site assessment phase is to obtain the data necessary to characterize and identify sources, pathways, and targets/receptors at sites in order to help EPA prioritize sites posing actual or potential threats to human health or the environment. The site assessment phase begins with site discovery or notification to EPA of possible release of hazardous substances. The contractor shall also be knowledgeable of, and utilize software to assist conceptual site model development, create scenarios, and present site information/data to assist EPA decision making during all phases of assessment, including the Preliminary Assessment (PA), Site Inspection (SI), Expanded Site Inspection (ESI), Site Reassessment (SR), and Site Inspection Prioritization (SIP), as well as data gap analyses and integrated assessments with the removal program.

1. Preliminary Assessment (PA)

A PA is the first step in determining whether a site warrants a Superfund response after the site has been entered into CERCLIS. A PA focuses on determining/verifying whether a site is eligible for a response action under CERCLA and the need for immediate and/or long-term response actions. The contractor shall provide technical support to EPA on PA activities; review past and present facility waste handling practices and permit history; document the presence, quantity, type, or absence of uncontrolled or un-contained hazardous substance(s) on-site; document releases to the environment; identify pollution disposal pathways; determine pathway specific receptors and surrounding population density; locate other environmentally sensitive receptors (e.g., wetlands and endangered species); and perform PA activities in accordance with EPA OSWER Directive 9345.0-01A, “Guidance for Performing Preliminary Assessment Under CERCLA,” dated Sept 1991; <http://www.environmental.usace.army.mil/info/technical/risk/riskguide/riskguide.html> and the NCP; EPA OSWER Directive 9375.2-09FS, “Improving Sites Assessment: Abbreviated Preliminary Assessments,” at <http://www.epa.gov/superfund/sites/npl/hrsres/fact/apa.pdf>.

2. Site Inspection (SI)

The contractor shall provide technical support to EPA on SI activities; and perform SI activities in accordance with EPA/540-R-92-021, “Guidance for Performing Site Inspections Under CERCLA,” dated September 1992 at: <http://www.epa.gov/superfund/sites/npl/hrsres/si/siguide.pdf>. An SI incorporates and builds upon the objectives of the PA and may require the collection of samples or the evaluation of existing analytical data to evaluate site conditions.

3. Combined PA/SI

The contractor shall perform preliminary search and field activities outlined in Section II.B.1, PA and II.B.2, SI, simultaneously, in accordance with EPA OSWER Directive 9375.2-10FS, “Improving Site Assessment Combined Preliminary Assessment/Site Inspection Assessments” at <http://envinfo.com/inssfile/assess2.pdf>.

4. Site Inspection Prioritization (SIP)

The contractor shall perform SIP activities, in accordance with EPA OSWER Directive 9345.1 15FS, “Site Inspection Prioritization Guidance,” dated August 1993, as amended.

The goal of SIP is to gather any additional information necessary following the completion of the SI to help set priorities among sites for NPL listing or to screen sites from further Superfund attention.

5. Site Reassessment (SR)

The contractor shall perform site assessment activities in accordance with EPA OSWER Directive 9360.3-08, "Superfund Removal Procedures/The Removal Response Decision: Site Discovery to Response Decision" dated September 1994, and the NCP and Section II.A.3. An SR represents the gathering and evaluation of new information on a site previously assessed under the Superfund program to determine whether further Superfund attention is needed. An SR serves as a supplement to previous assessment work and is not a replacement for traditional assessment activities. The scope of work for SR activity is flexible but will usually represent a component of a traditional site assessment action (i.e. PA, SI, and SIP). The purpose of this action is to document the expenditure of Superfund resources on older sites where EPA has received new information or learned that the site conditions have changed.

6. Expanded Site Inspections (ESI)

The contractor shall perform ESI activities, in accordance with EPA 540-R-92-021, "Guidance For Performing Site Inspections Under CERCLA," dated September 1992, at <http://www.epa.gov/superfund/sites/npl/hrsres/si/siguide.pdf>. The purpose of the ESI is to provide additional information required to further characterize and define a site for a potential response action, i.e., to begin a Remedial Investigation (RI).

7. Expanded Site Inspections/Remedial Investigation (ESI/RI)

The contractor shall perform ESI/RI activities. The ESI/RI is used to expedite remedial response By gathering site characterization data common to both ESI and RI activities in one step, thereby expediting the later collection of data when comprehensive RI activities are performed.

8. Integrated Assessments (IA)

The contractor shall assess the potential for short or long term clean-up actions; and perform IA activities in accordance with EPA OSWER Short Sheet 9345.16FS, "Integrating Removal and Remedial Site Assessment Investigations," dated September 1993. This document is available from EPA by requesting call number PB93-963341 or online at <http://www.epa.gov/nscep/index.html>.

The contractor shall provide removal assessment activities in accordance with EPA OSWER Directive 9360.3-08, "Superfund Removal Procedures/The Removal Response Decision: Site Discovery to Response Decision" dated September 1994, and the NCP. The purpose of an IA is to gather data that meet the requirements of both an RA and a SI at the same site. The data gathering effort at these sites may require field screening and full analysis of samples.

9. Remedial Investigation/Feasibility Study (RI/FS)

The contractor shall perform RI/FS tasks in accordance with EPA OSWER Directive 9355.301.h, "EPA Guidance for Conducting Remedial Investigation and Feasibility Studies under CERCLA," dated October 1988.

An RI/FS is an extensive assessment conducted at a site that is proposed/added to the NPL. The purpose of conducting an RI/FS is to develop the data necessary to support the selection of a remedy to eliminate, reduce, or control risks to human health and the environment. The RI/FS

process includes these phases: scoping; site characterization, development and screening of alternatives, treatability investigations, and detailed analysis. The RI/FS activities under this SOW will be strictly data collection/analysis and not engineering design. Under certain circumstances, an RI/FS may also be conducted at sites not listed on the NPL.

C. Technical Support Activities

The requirements under this section include the gathering and analysis of technical information and related data, the preparation of draft technical reports and related materials on oil and hazardous substance investigation, assessment cleanup, disposal technologies, process activities, operations, problems, and trends.

1. Multi-media Surveys and Inspections

The contractor shall provide technical support to EPA for multi-media surveys and inspections activities. EPA conducts multi-media surveys and inspections at facilities where hazardous substances are managed, treated, stored, or disposed. EPA also conducts these activities in the event of release of hazardous substances to the environment. These activities may support multiple environmental regulations and/or programs.

2. Engineering Evaluation and Cost Analysis (EE/CA)

The purpose of the EE/CA is to allow public participation in the removal decision process, if time permits, and give consideration to alternatives to land disposal. The goal of an EE/CA is to identify the objectives of the removal action and to analyze various alternatives.

After EPA issues the EE/CA approval memorandum, the contractor shall conduct EE/CA activity in accordance with EPA 540-R-93-057, "Guidance on Conducting Non-Time Critical Removal Actions Under CERCLA," dated August 1993. This document is available at <http://www.ntis.gov/> as publication number PB93-963402. EE/CAs are required for non-time critical removal actions.

3. Public Participation Support

The contractor shall perform public participation activities in accordance with EPA OSWER Directive 9360-05, "Public Participation Guidance for On-Scene Coordinators: Community Relations and the Administrative Record," dated June 1992, and "Community Relations in Superfund: A Handbook," dated January 1992; and provide technical support to EPA in the development, planning, and implementation of community relations and public support activities.

4. Site Discovery Program

The contractor shall support EPA's determination of whether sites require additional site assessment activities by collecting, recording, and analyzing detailed information about the site; and performing site discovery activity in accordance with EPA OSWER Directive 9375.2-11FS, "Improving Site Assessment: Pre-CERCLIS Screening Guidance," dated October, 1999. The purpose of the Site Discovery Program is to determine whether sites require additional site assessment activities. The guidance is available at: <http://www.epa.gov/superfund/sites/npl/hrsres/fact/sascreen.pdf>.

5. Human Health/Ecological Risk Assessment

The contractor shall perform human health and ecological risk assessments in accordance with relevant guidance. Toxicity values can be sought using the Integrated Risk Information System

(IRIS), Health Effects Summary Tables, and other sources. Risk assessment may include, but is not limited to data collection and evaluation, exposure assessment, toxicity assessment, and risk characterization.

6. Administrative Records (AR) Support

The contractor shall provide technical support to EPA for compiling information for inclusion in the AR as defined in Section 113(k) of CERCLA. The AR includes records, data, and guidance that EPA uses to determine the federal response action.

7. Equipment Maintenance

The contractor shall provide support for equipment maintenance of government owned property or equipment, which is not government furnished property (GFP). The equipment shall be calibrated and maintained in accordance with manufacturer's instructions.

8. Cost Recovery

The contractor shall provide technical and administrative support to EPA in collecting and securing evidence to aid EPA in its cost recovery efforts. This may include compiling cost documentation packages and gathering information, which may be used to establish liability and support EPA's response decisions.

The contractor shall collect and organize data in defense of claims, such as claims for reimbursement under CERCLA and other applicable environmental statutes. This service will be in support of preparation by EPA for civil and administrative settlements, including pre-trial and auxiliary services, leading to formal negotiations/meetings with private parties, and trial.

The contractor shall analyze government-furnished documents (e.g., provide support for data analysis of the overall cost recovery program). Government-furnished documentation may include a description of work performed, site specific cost summaries, tracking of oversight costs, billings and payments received, statutes of limitations, and status of past removals and remedial actions.

If EPA is unable to provide access to documents needed in the performance of cost recovery activities, the contractor shall obtain specific cost information from firms whose EPA contracts have expired.

The contractor shall copy, organize, summarize, maintain, and track evidentiary materials, which are stored in a non-site specific manner to facilitate review of liability determinations.

The contractor shall have a document storage technology, which reflects EPA's technology.

9. General Technical Support

The contractor shall provide information, analysis, options, and recommendations for implementing emerging technologies and maintaining program currency.

The contractor shall provide information and options, which will enable EPA to draft specifications for EPA program activities. The specifications are used in connection with the provision of technical and cleanup support. The contractor shall provide information for EPA's review and approval. EPA will make the final determination of the acceptability of the information the contractor submits. Examples of technical specifications include data for developing site safety plans for response personnel and the public; information on local

contingency planning; response actions, methods of hazard mitigation; containment; removal and disposal options, and personnel and equipment requirements.

The contractor shall provide technical support and procedures for implementing radiological response actions and closeout. This will involve providing sampling and scanning plans under MARSSIM <http://www.epa.gov/radiation/marssim/>, Final Status Survey Reports, radon emissions modeling, ResRad modeling, using the EPA Radiological Preliminary Remediation Goal Calculator, and other radiological health physics tools and support.

D. Data Management Support

The contractor shall provide data management support using various programs including SCRIBE (www.epaoscribe.com); utilize hardware and software to provide information technology support in the form of web applications; Geographical Information Systems (GIS) support in the form of maps, data, mapping application, and other products; mobile device application development; maintenance of data applications utilized in support of all removal and remedial activities, and be used routinely to enter, track, document (i.e., create and provide metadata) or retrieve information and data developed during the performance of the contract. To the extent possible, the contractor shall use and/or adapt existing tools, software, information standards (EPA, FGDC, ISO, [Data.gov](http://data.gov)) and conventions. When reporting analytical results, the contractor shall to the extent possible use electronic data deliverables and an automated data review tool, such as Web Electronic Data Review (WebEDR) or defined SCRIBE auditor rules based on the Data Management Plan and Data quality Objectives.

The contractor shall provide data management support services that are thoroughly integrated with EPA's CERCLA process and authority under the NCP when conducting site assessment, removal, remedial, field activities and community involvement activities. For the purposes of EPA's responsibilities within the NCP, the term "data" refers to all tabular data, geospatial information, and electronic records and files (unless otherwise indicated). EPA requires a comprehensive approach to data management so that these various types of data are collectively managed with relevant foreign keys that enable the assimilation of information and the development of a complete operational picture. EPA also requires that standard data management support services are implemented as a normal function of any removal or remedial operation to insure effective and efficient data collection, analysis and distribution.

The Contractor shall provide data management support services that address the collection, processing, management, distribution, analysis and archival of data and information. The contractor shall use and/or adapt existing tools, software, information standards and conventions adopted by EPA but EPA expects that the tools, processes and technology that will be used to provide these support services will evolve over the duration of the contract. Thus, the Contractor shall assess these improvements and continually adapt to provide more efficient and effective data management services.

The contractor shall deploy all data management support services in close coordination with EPA experts such as RPMs, OSCs, and the National Acquisition and Technical Assistance Team (DATA Team). Where appropriate, the contractor shall coordinate closely with EPA regional GIS or Records Management leads for specific portions of integrated projects. The Contractor shall develop, implement and update as required a Data Management Plan (DMP) in accordance with EPA specifications. This DMP will detail the standard processes, procedures and tools that the contractor

will use to support all site work. However, the contractor's DMP will allow for easy customization so that rapid changes can be made to support unforeseen operational requirements. The required components of this DMP are:

- Data Flow Diagram: Illustrated overview of the relevant data management work process(es) from data collection through data storage, data verification, data analysis and data reporting.
- Roles and Responsibilities: Identification of the key data management positions and the tasks that personnel serving in these positions will perform. These positions should be depicted in the Data Flow Diagram.
- Field Data Collection Methodologies: A description of the procedures and tools that are used to capture data in the field.
- Data Collection SOPs and Checklists: Specific step-by-step procedures and or protocols that are used to collect, process and load data to SCRIBE or GIS.
- Data Deliverables: A description of the key data products that are generated in the field or by external parties such as laboratories, PRPs or other Stakeholder Partners.
- Data Processing: A description of the procedures and tools that are used to reformat or otherwise prepare data for loading into the data system.
- Data Element Dictionaries: A listing of the data tables, data fields, formatting requirements, conditional requirements and valid values that are used to manage tabular data, spatial information and electronic records in the data management system.
- Entity Relationship Diagrams: An illustration showing the relationships between the data tables and data fields that are used to manage tabular data, spatial information and electronic records in the data management system.
- Data Verification SOPs and Checklists: Specific step-by-step procedures and or protocols that are used to verify the quality and consistency of the tabular data, spatial information and electronic records in the data management system.
- Reporting Requirements: A description of the basic procedures and tools used to query, analyze and report both tabular and spatial data.
- Reporting SOPs and Procedures: Specific step-by-step procedures and or protocols that are used to query, analyze and report both tabular and spatial data.

The Contractor shall support the collection of data before and during all site work by:

- Identifying and documenting the specific data and information that must be collected to meet the needs of specific activities.
- Adapting standard processes and tools to meet the needs of specific activities as necessary.
- Developing effective mechanisms to enter observations and other field parameters into an electronic format. These mechanisms should allow for rapid changes to the types of data that are being collected as well as the submission of this data to a central repository on a real-time basis. These mechanisms should also have contingency processes that allow for the collection and submission of data should the ability to submit data in real-time not exist.
- Providing training and support to stakeholders in the implementation of the DMP. Support could include:
 - Providing an Virtual Private Cloud (VPC) to host geospatial web viewers;
 - Providing and maintaining field data collection forms;
 - Providing support in developing and implementing site specific DMP;
 - Providing onsite data management support for the implementation and maintenance of a stakeholder specific environmental database; and

- Provide third party review of Stakeholder PRP DMP.

The contractor shall support the processing and management of data during all activities by:

- Maintaining an integrated platform or central repository that can be used to manage tabular data, geospatial data and electronic records or files;
- Adapting this integrated platform or central repository to meet the needs of site activities;
- Moving data from various monitoring equipment to a central data repository on a real-time basis;
- Loading data deliverables from external parties such as laboratories, federal partners, PRPs or stakeholders to a central data repository; and
- Maintaining and enforcing quality assurance parameters to verify both the quality and completeness of data being loaded to the central repository.

The contractor shall support the distribution and analysis of data during all field operations by:

- Deploying geospatial web viewers and other web-enabled data distribution portals to support the information needs of EPA OSCs, RPMs, and other Federal, and State partners, stakeholders, and tribal agencies;
- Customized these data distribution capabilities to support the needs of EPA's partners and the general public; and
- Generate site specific data reports and maps as required by EPA OSCs and RPMs. GIS Regional Coordination and Support where directed by Task Orders, the contractor will provide GIS support for projects associated with field efforts. These GIS projects will follow the same data management conceptual processes as the projects that are described above.

These projects may include, but are not limited to:

- Spatial data development or acquisition;
- Spatial data management;
- Spatial data locational QA/QC;
- Spatial data publishing via web-maps and browsers;
- Spatial analysis, mapping and reporting;
- Spatial data maintenance and metadata creation;
- Geospatial web viewer design, maintenance and widget development and design; and
- Create and maintain a web based portal for the management of base layers and web viewers.

The contractor will provide spatial data development and or spatial data acquisition support to EPA GIS projects as tasked by individual Task Orders. The contractor will ensure that acquired or developed data has associated metadata that meets current Federal Geographic Data Committee (FGDC) metadata standards requirements and any additional EPA Region 9 requirements. The contractor will evaluate the currency, accuracy and precision of all data acquired/developed, and will document those findings in the required metadata.

The contractor will ensure all spatial data developed or acquired that is submitted to EPA or stakeholders GIS program is managed according to EPA programmatic GIS standards. These standards will be provided by EPA and should be included within the program and contractor DMPs. The purpose of these data management standards are to help automate data analysis, reporting and publication while maintaining flexibility in choosing deployment platforms.

The contractor will perform spatial data QA/QC via individual Task Orders as requested. The contractor will use or modify existing EPA programmatic SOPs for locational data QC. Locational QC frequently only impacts the x and y coordinates of a feature or facility, and relies on high resolution aerial imagery assessment. Locational QC is needed for many EPA produced and maintained datasets to ensure proximity analyses and targeting efforts yield accurate results and accurately profile the environment for each of these features. Features include but are not limited to Mine features and locations, structures, mining roads, historical reclamation features, waste piles, field support infrastructure, sensitive habitats, historical areas, migratory pathways, natural springs, wells and streams and creeks to name a few.

The contractor will provide spatial data publishing support via web map browser application development and support. Existing standards and methods used in all site projects will be applied to other non-field GIS support work. This include the ability to develop and modify a map browser, to host and/or support hosting in a variety of public-facing environments, and to provide ongoing maintenance, management and updating as tasked. The contractor will provide spatial analysis, mapping and reporting as tasked by individual Task Orders.

E. Training

The contractor shall provide technical support to EPA for EPA employee training activities, in both developing and delivering presentations. Non-EPA employees may join in minimal numbers, as long as the training is intended for EPA employees. Support may include developing classes which incorporate new regulations and issues pertinent to the response community; accommodating specific training needs of the organizations to be trained; continually evaluating all training material, content, quality, and effectiveness; recommending to EPA the appropriate additions, deletions and modifications of training material; providing more than one class during the same time period, if required; providing adequate manpower, equipment and reference materials to class attendees; coordinating class schedules with the requesting agency and EPA as far in advance as possible; providing EPA with a proposed monthly training calendar; and providing all course attendees with reference materials, such as the National Institute for Occupational Safety and Health (NIOSH) pocket guides, Orange Department of Transportation Emergency Response Guidebook, government regulations, and all other reference material used in the course to be loaned to students for the duration of the class. All reference materials will be current, and the contractor will provide student manuals for each student.

Training formats may include classroom training, exercises, and field training. Class size will range from 2 to 35 persons, but 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) classes may be limited to 20 persons.

Training Course Descriptions

Duration	Title
40 hours	HAZWOPER Operation Level
40 hours	HAZWOPER Technician Level
8 hours	Annual Refresher Class
16 hours	Environmental Sampling Class
16 hours	Radiation Training

Training Equipment Requirements

The contractor shall provide current, calibrated, and operational equipment, which is necessary to support the training courses; be responsible for disposing of any hazmat chemicals, waste chemicals, and PPE in accordance with all federal, state and local regulations; present course material to EPA for review and approval prior to delivery; and refer any questions relating to the interpretation of EPA policy, guidance, or regulation to EPA training staff.

F. Logistical Services

The contractor shall provide logistical services as required to support SOW activities including Response; Assessment; Technical Support; Data Management; and Training.

III. Technical Requirements (Cultural Resources- Module 2)

The technical requirements under this SOW include cultural resources support for assessment activities for time-critical and non-time-critical removal actions, and for remedial actions. Exhibit B – Specific Tasks List, identifies tasks that may be performed to satisfy contract requirements. Tasks performed shall be in accordance with applicable statute(s), the NCP, and any other relevant law or regulations (see Exhibit C – Statutory and Regulatory Framework.). This contract is specifically designed to provide technical support services to EPA at Navajo area uranium mining-related sites located in Regions 6 and 9.

The primary objective of cultural support activities is to conduct research and surveys necessary to characterize cultural, archeological, and architectural resources at sites impacted by the activities described above and other work that may be conducted in support of the AUM cleanup efforts on and around the Navajo Nation. Work performed under this contract shall comply with all applicable federal, state, tribal and local regulations, and standards; including but not limited to:

- National Historic Preservation Act (NHPA);
- The Native American Graves Repatriation Act (NAGPRA);
- The Archaeological Resources Protection Act (ARPA);
- The National Environmental Protection Act (NEPA);
- The Navajo National Cultural Resources Protection Act (CRPA); and
- The New Mexico Cultural Properties Protection Act (CPPA).

Cultural support activities will be presented in stand-alone documents and/or as part and complement to the activities performed under Module 1 of this contract, namely: PA, SI, combined PA/SI, SR, ESI, ESI/RI, IA, RI/FS, EE/CA.

The contractor performing work described in this SOW shall comply with 48 CFR Part 46. The contractor is required to submit a quality management plan (QMP) prepared in accordance with EPA Requirements for Quality Management Plans (QA/R-2), EPA/240/B/01/002, March 2001, which describes the contractor's quality system. The QMP will be approved by the EPA.

For project-specific activities and operations requiring environmental data operations, defined as “any measurement or information that describes environmental processes, location, or condition; ecological or health effects and consequences, or the performance of environmental technology,” the contractor shall develop or perform work under a Quality Assurance Project Plan (QAPP) in accordance with EPA Requirements for Quality Assurance Project Plans (QA/R-5), EPA/240/B/01-003, March 2001.

Activities shall support EPA’s obligations under CERCLA, as well as any future laws or regulations promulgated pertaining to EPA’s response obligations.

The contractor shall provide field support, in accordance with applicable methods, procedures and guidelines; document site conditions and compile information and data in a clear and concise manner; conduct data management activities to facilitate documents being readily available for distribution; provide technical advice, findings, facts, and recommendations; suggest technical options and review technical submissions, including work plans for EPA and other federal, state, local, and Tribal officials as directed; and assist with coordination and communication between federal, state, local, tribal responding agencies, and the public.

The contractor shall monitor and oversee field activities, workers, and public safety; and adhere to appropriate safety procedures and advise the OSC/RPM on health and safety matters.

The contractor will be required obtain written access to the properties prior to conducting any field activities. Due to incremental weather, access to the sites may be limited and may require the contractor to delay field work and/or leave equipment on-site, requiring the site be secured. In addition, accessibility to the site locations may be obstructed or limited due to the lack of roads and/or poor road conditions. The contractor must also comply with the Policy to Assure Competency of Laboratories, Field Sampling, and Other Organizations Generating Environmental Measurement Data under Agency- Funded Acquisitions. The policy can be found at: <http://www.epa.gov/fem/pdfs/fem-lab-competency-policy.pdf>.

The contractor will provide appropriately qualified personnel with the appropriate levels of personal protection equipment (PPE) for each field activity as needed (see Exhibit D – Levels of Personal Protective Equipment); as well as all necessary equipment (excluding EPA owned equipment) in good working condition and trained staff to operate the equipment.

The contractor shall provide data that are thoroughly integrated with EPA’s CERCLA process and authority under the NCP when conducting site assessment, response, and field activities. For the purposes of EPA’s responsibilities within the NCP, the term “data” refers to all tabular data, geospatial information, and electronic records and files (unless otherwise indicated).

The contractor shall provide data points using Geographical Information Systems (GIS) support in the form of maps, data, and metadata developed during the performance of the contract. To the extent possible, the contractor shall use and/or adapt existing tools, software, information standards (EPA, FGDC, ISO, Data.gov) and conventions.

The contractor will ensure that acquired or developed data has associated metadata that meets current Federal Geographic Data Committee (FGDC) metadata standards requirements. The contractor will evaluate the currency, accuracy and precision of all data acquired/developed, and

will document those findings in the required metadata.

The contractor will ensure all spatial data developed or acquired that is submitted to EPA or stakeholders GIS program is managed according to EPA programmatic GIS standards. These standards will be provided by EPA. The purpose of these data management standards are to help automate data analysis, reporting and publication while maintaining flexibility in choosing deployment platforms.

The contractor shall adhere to the requirements regarding EPA's Background Check and Drug Screening Policy identified in Exhibit F – Levels of Personnel Background Check and Drug Screening for Contractor Employees.

To safeguard the EPA workforce and comply with Homeland Security Presidential Directive 12 (HSPD-12), Executive Order (E.O.) 13467, E.O. 13488 and Office of Personnel Management (OPM) regulations, EPA requires a set of procedures as outlined in Exhibit G, Agency Security Requirements for Contractor Personnel.

A. Cultural Resources Support

IV. Documentation Requirements (Applies to Module 1 and 2)

In the course of performing tasks identified in this SOW, the contractor shall submit all analyses, options, recommendations, reports, training materials, and any other work products in draft form for review by the Contracting Officer (CO) or the Contracting Officer's Representative (COR) prior to use or distribution.

The contractor shall **not** publish, release, use, or disclose any work product generated under this SOW without EPA's written approval; interpret EPA policies or regulations when conducting any training, seminars, or presentations; and/or provide any legal advice or legal interpretations.

The contractor shall **not** provide any legal service to EPA under this contract, without the advance written approval of EPA's Office of General Counsel.

EPA will make all final regulatory, policy, and interpretative decisions resulting from contractor-provided recommendations; and will also make all final decisions regarding compliance determinations, or the violations of an order, law, regulation, etc.

The contractor shall submit documents that demonstrate a good command and correct usage of the English language (e.g, discussion of facts flow in a coherent and organized manner); use proper grammar (noun and verb tense correspond, etc.); and are free of incomplete sentences and misspelled words.

For deliverables that contain recommendations, the contractor shall explain or rank policy; explain or rank alternative actions; describe procedures used to arrive at recommendations; summarize the substance of deliberation; report any dissenting views; and cite sources relied upon.

Exhibit A – Specific Tasks List (Module 1)

This list of contract services does not encompass all possible response activities, but is an extensive sample of types of activities that may be required under this contract. More specific requirements and tasks will be outline in the site specific Task Orders issued under this contract. This exhibit structure does not preclude using a task in any other contract activity.

SOW Activities:

- A. RESPONSE
- B. ASSESSMENT
- C. TECHNICAL SUPPORT
- D. DATA MANAGEMENT
- E. TRAINING
- F. LOGISTICAL SERVICES

A. RESPONSE

The contractor shall support EPA in the following tasks:

- Identify local and elected officials.
- Obtain site access documentation from affected parties.
- Collect and document facts regarding the discharge/release or threat of discharge/release to include its source and cause.
- Analyze the nature, amount, and location of discharged or released materials.
- Analyze the probable direction and time of travel of discharged or released materials.
- Identify the pathways to human and environmental exposure.
- Analyze the potential risk to human health and the environment posed by the release of hazardous substances, contaminants or pollutants.
- Identify the pathway and nexus to navigable waters.
- Analyze the potential impact on sensitive areas, natural resources, and property.
- Develop options to abate, prevent, minimize, stabilize, mitigate, contain, control, eliminate, or remove the release or threat of release.
- Prepare a sampling plan which describes the number, type, and location of samples and the type of analyses.
- Monitor work of other federal contractors.
- Coordinate with and assist other federal contractors to be determined by EPA, as required.
- Recommend waste disposal options.
- Review completeness of disposal documentation, such as manifests, waste profile data, and other information.
- Support the Contaminated Structures Program if required.
- Monitor and measure environmental conditions on a real-time basis using qualitative and quantitative instrumentation.
- Identify site characteristics such as populations, sensitive environments, site usage, hydrogeological and meteorological conditions, and other pertinent site conditions.
- Identify and develop strategies to protect sensitive areas.
- Coordinate with state, Federal, and Tribal Natural Resource Trustees.

- Develop and/or evaluate plans for the remediation of habitats affected by the release of hazardous substances and/or other aspects of site remediation activities. EPA will evaluate recommendations from the contractor and any final plans will be prepared by EPA.
- Identify pollutant dispersal pathways.
- Identify the extent of contamination in various media such as soil, water, air, groundwater, sediments, and lagoon sludge.
- Monitor for health and safety compliance.
- Review and recommend health and safety procedures for response activities, such as OSHA levels of protection associated with a site.
- Develop site specific Health and Safety Plans (HSPs) for field activities which comply with OSHA and EPA requirements.
- Develop and submit a site sampling and Quality Assurance Project Plan (QAPP) for field activities to ensure the usability of the data.
- Conduct both on-site and/or off site environmental sampling activities.
- Perform air monitoring.
- Perform analytical data validation.
- Complete and maintain documentation of all contractor actions and costs.
- Provide information to federal, state, and Tribal natural resource trustees to assist the trustees in the determination of actual or potential natural resource injuries. Documentation shall provide the following: the source and circumstances of the release; the identity of responsible parties; the response action taken; an accounting of contractor costs incurred in support of EPA response actions; and the impacts and potential impacts to the public health and welfare and the environment.
- Perform radiological/biological/chemical sampling and analysis.
- Decontaminate equipment and personnel. This includes not only the contractor's but also Government-owned and operated equipment that is used exclusively by the Government, as well as any shared equipment.
- Evaluate appropriate decontamination techniques and recommend procedures for setup and implementation.
- Provide minor (non-emergency) containment, transport, and disposal actions (generally not exceeding 40 hours per assignment).
- Provide temporary stabilization prior to the mobilization of other responders.
- Provide cost analysis/information for response alternatives.
- Document site-specific contractor costs incurred for response actions.
- Observe and document federal, state, and private actions taken to conduct a response action.
- Obtain permits from federal, state, or local agencies, associated with the contractors' response activities.
- Develop and/or evaluate plans for the remediation of habitats affected by the release of hazardous substances and/or other aspects of site remediation activities. EPA will evaluate recommendations from the contractor and any final plans will be prepared by EPA.
- Develop a communications plan to ensure adequate and complete communications on site and with EPA Regions 6 and 9. The plan should consider hardware and software needs to

transmit voice, video and other digital/data sources. The plan should consider the remoteness of some areas within Regions 6 and 9 where communication is difficult.

B. ASSESSMENT

The contractor shall support the EPA in the following tasks:

- Locate and review existing site, facility, and/or release data.
- Conduct off-site perimeter visual observation of sites.
- Conduct site visits to identify all potential hazards. Document site conditions with written and visual documentation.
- Obtaining written access to the properties prior to conducting any field activities.
- Compliance with Sec 106 of the NHPA and related federal laws within non-tribal lands in NM and compliance with similar laws in the Navajo Nation.
- Assess potential impact to endangered species, historical sites, and other cultural resources.
- Review and interpret environmental data.
- Locate other environmentally sensitive receptors, for example, wetlands and endangered species.
- Conduct site visits and inspections as necessary to identify, evaluate, and delineate habitat types including wetlands.
- Collect, review, and/or analyze topographic, photographic, and available relevant data from scientific publications, federal, state and local agencies, and academic institutions to provide support in the identification of physical and biological factors to be considered in the determination of areas and resources (physical and biological) that have potentially been affected by the release of hazardous substances.
- Evaluate site data, media, habitats, and ecological relationships to identify, analyze, and document pathways of contaminant migration and concentration. This may include the use of computerized information systems and models.
- Collect, preserve, identify, and prepare terrestrial and/or aquatic biological specimens for population and community analysis. Evaluation of gross pathology and individual organs and/or cells on a histological or sub-cellular basis for any pathological changes resulting from the release of hazardous substances.
- Design, perform, and analyze both field and laboratory bioassay/toxicity tests on plant, invertebrate and vertebrate species.
- Conduct waste profile analyses.
- Conduct file reviews (for example, federal, state, Tribal, and local agency records) to obtain background information to analyze releases of hazardous substances, pollutants, and/or contaminants.
- Collect or review data such as site management practices, information from generators, photographs, historical photographic analyses, literature searches, and personal interviews.
- Identify active or historical facility processes or operations that may contribute to the release or threat of release of hazardous substances, pollutants, contaminants.
- Collect, analyze, and validate data in accordance with EPA standard methods for sample collection and analysis. The contractor is required to submit a quality management plan which will be approved by the agency. Once approved by the agency, the contractor will use the approved EPA guidelines as the standard method for sample collection and analysis.
- Review and interpret environmental data.
- Identify and address data gaps required to meet EPA assessment objectives, for example, background levels, ARARs, and groundwater information.
- Install monitoring wells and/or piezometers.

- Conduct geophysical surveys/investigations.
- Dispose of investigation derived wastes in accordance with EPA OSWER Directive 9345.3-02, "Management of Investigation-Derived Wastes During Site Inspections," May 1991. The document is available at <http://nepis.epa.gov/EPA/html/Pubs/pubtitleOSWER.html>
- Determine pathway-specific receptors and surrounding population density.
- Provide recommendations and options regarding the following:
 - identifying releases that pose no significant threat to public health or the environment;
 - determining whether an immediate threat to public health or the environment exists;
 - evaluating potential need for a response action;
 - conducting further investigation;
 - evaluating no further action;
 - evaluating state referrals;
 - conducting referrals to other federal agencies;
 - conducting referrals to other EPA programs;
 - evaluating facility actions; and
 - other actions.
- Collect data required to better characterize the release for more effective and rapid initiation of the RI/FS or response.
- Analyze site risks regarding whether site contaminants pose a current or potential risk to human health and the environment in the absence of any response action to include the following:
 - contaminant identification;
 - assessment;
 - toxicity assessment;
 - risk characterization; and
 - provide information necessary to determine whether or not a response is necessary at the site, provide justification for any response action proposed, and explain what exposure pathways need to be addressed.
- Identify data gaps.
- Perform analytical sampling.
- Identify site characteristics such as populations and sensitive environments.
- Identify and develop strategies to protect sensitive areas.
- Coordinate with state, Federal, and Tribal Natural Resource Trustees.
- Locate and obtain existing biological surveys.
- Obtain written access to the properties prior to conducting any field activities.
- Assess potential impact to endangered species.
- Collect, analyze, and validate data in accordance with EPA standard methods for sample collection and analysis.
- Review and interpret environmental data.
- Determine pathway-specific receptors and surrounding population density.
- Locate other environmentally sensitive receptors, for example, wetlands and endangered species.
- Complete biological and botany surveys as required.
- Complete biological assessments.
- Report the findings of the studies to EPA.
- Provide a biologist whenever field work necessitates a biologist onsite.

C. TECHNICAL SUPPORT

The contractor shall support EPA in the following tasks:

- Locate and review files of waste generator(s), site owner(s), site operator(s), and other documents relating to past operator(s), for example, deeds, and court transcripts.
- Interview site owner(s), operator(s), state/local officials, residents, and other interested parties.
- Provide a written record of PRP identification efforts to assist EPA in determining cost liability.
- Identify PRPs.
- Analyze the accuracy, timeliness, and completeness of PRP reports.
- Conduct deed and title searches.
- Provide appraisals of real property.
- Provide financial analysis and corporate research.
- Develop public information summaries for internet distribution.
- Disseminate EPA-approved information to the public.
- Provide expert testimony.
- Provide health indication sampling and analysis.
- Provide engineering design products and services.
- Provide COR-approved information to the state, local Tribal, or natural resource trustee agencies.
- Provide information for Freedom of Information Act (FOIA) request responses and to evaluate facilities' release history for inclusion in COR-specified internet websites.
- Provide technical support to EPA for the identification of PRPs associated with a site, facility, and/or release.
- Provide technical and administrative support to EPA for notification of PRPs as to their status related to a site, facility, and/or release.
- Provide technical support to EPA in connection with proceedings against owners or operators of facilities operating in violation of reporting requirements and uncontrolled hazardous substances present. Such technical support will include providing background technical information to EPA in obtaining an injunction against continued use of the site, an order to undertake remedial action, or recovery of cost incurred by the government in undertaking such action.
- Provide technical support to EPA in enforcement case development support including well drilling and sampling, field sampling, geophysical surveys, well inventories and other support to provide evidence to support EPA litigation or negotiation with PRPs. Work may be undertaken to fill a variety of data gaps related to extent of contamination and damages or to augment enforcement investigation efforts.
- Provide technical and administrative support to EPA in the development of an enforcement plan.
- Collect and review available data and background information about a site, facility, or release. This shall include information about the nature of the waste present, waste management at the site, environmental data, and health data. Collection of data also includes photographic and cartographic documentation of site conditions.
- Analyze and document the extent of an incident, the potential hazards, type of resources needed, and the actions of the PRPs to respond.

- Draft lessons learned reports.
- Develop and update the mailing list, an e-mail list, and an e-mail group distribution capability to send EPA approved and EPA-authorized notices.
- Accompany the EPA during on site facility surveys and inspections at sites, facilities or releases where hazardous waste contaminants or pollutants are managed, treated, stored or disposed.
- Record and document compliance with ARARs related to environmental statutes such as the Resource Conservation and Recovery Act (RCRA) or the Clean Water Act (CWA).
- Compile multi-media checklists to be used at sites, facilities, or releases. During the performance of multi-media surveys and inspections the contractor may have access to CBI. The contractor shall treat all CBI in accordance with the CBI clauses in the contract.
- Perform literature surveys including the use of the Alternative Treatment Technology Information Center (ATTIC), the Superfund Innovative Technology Evaluation (SITE).
- Program, the Record of Decision Systems (RODS) database, and the Risk Reduction Engineering Laboratory (RREL) Treatability Database (access to be provided by EPA, if necessary).
- Prepare project planning documents to include the following: work plan, field operations plans, health and safety plans, and/or quality assurance project plans.
- Perform laboratory, bench, and/or pilot-scale testing of established, emerging, and/or innovative technologies.
- Evaluate the effectiveness and compliance of the tested or proposed technologies with federal and state requirements. EPA will review all evaluations and make any and all decisions or determinations regarding the proposed technologies.
- Report the findings of the studies to EPA.
- Oversee and review treatability studies being performed by PRPs.
- Provide technical and administrative support in the preparation of a draft EE/CA approval memorandum. All final EE/CA approval memoranda will be prepared by EPA.
- Provide technical and administrative support in preparing draft EE/CA reports, which shall include the following sections: site characterization, identification of response action objectives, identification of ARARs, identification and initial screening of response action alternatives, analysis of response action alternatives, comparative analysis, and selection of the response action. While the contractor will analyze the alternative response actions, final decisions, determinations and judgments will be made by EPA.
- Provide technical and administrative support for the preparation of a summary of the responses by interested parties.
- Assemble EPA-provided records.
- Organize, maintain, and duplicate materials.
- Compile documents for the administrative record.
- Coordinate records compilation with state offices and federal facilities.

- Organize and compile records for enforcement cases.
- Operate government-owned equipment at the direction of the OSC/RPM, to include vehicles.
- Maintain and calibrate government equipment in accordance with OSC/RPM and/or manufacturer's instructions, to include vehicles.
- Pick up, transport, and deliver necessary government equipment to and from response sites, to include vehicles.
- Decontaminate equipment operated by the government at a response site prior to its being transported away from that location.
- Collect and summarize all incurred cost documentation in support of costs incurred, using existing cost documentation systems and adjust media storage to reflect EPA implementation of advances in automated methods.
- Perform an audit of cost documentation based upon EPA guidance.
- Produce a documentary audit trail to establish proof of costs incurred using existing systems and other documentation guidance.
- Ensure that the cost document compilation is complete.
- Provide technical support in developing proof to support allocation of non-site specific charges on a site-specific basis.
- Accumulate and verify all costs incurred in connection with a site or sites by reconciling all supporting documentation with data in agency financial and documentation systems.
- Provide technical support in reviewing all cost documentation or accounting procedures for deficiencies and/or potential sources of challenge.
- Maintain an organized cost package or cost document file that includes cost summaries for each cost element claimed together with organized supporting documentation.
- Research state or other federal agency accounting procedures to the extent necessary to enable a complete audit of costs incurred by the state or other agency in connection with Superfund sites.
- Review and analyze audits or technical reports for relevance to cost claims.
- Provide technical support in the review of pertinent EPA files and documents necessary to substantiate a close-out memorandum. The close-out memorandum will be prepared by EPA, with technical support from the contractor, when appropriate.
- Gather documents from EPA that authorized the work and documents that provide evidence that work was performed.
- Select and reserve meeting space.
- Arrange site tours and meetings.
- Develop visual aids to include computer driven presentations.
- Document technical meeting minutes.
- Provide a technical summary of the meeting.
- Conduct community interviews to develop an understanding of local concerns and desired involvement as part of the development of Community Relations Plans.
- Prepare Community Relations Plans in accordance with Community Relations in Superfund: A Handbook, January 1992.

- Provide data management for tracking community relations activities, including milestones in Community Relations Plans.
- Establish and update information repositories at or near selected sites.
- Prepare general or site-specific fact sheets.
- Provide support in planning and conducting public meetings and technical discussions involving PRPs and the public. This support will include the provision of audio-visual aids and reports as required by EPA.
- Assist in planning and conducting public briefings, conferences, workshops, community conferences, and training workshops.
- Write and/or place newspaper notices regarding the availability of site-related documents and public meetings.
- Provide recording/transcript services for public meetings or for the administrative record.
- Prepare studies and reports evaluating the effectiveness of community relations efforts and other topics of general interest, such as how incineration is perceived, and how to improve on communication regarding alternative and innovative technologies.
- Publicize location of the repository in local newspapers.
- Provide translator/linguistic support, or answer technical questions at public meetings.
- Provide support in collating, refiling, and organizing the above information as needed.

D. DATA MANAGEMENT

The contractor shall support EPA in the following tasks:

- Keep informed of all current/new information technologies and provide analysis and evaluation of these technologies.
- Provide data input/output services for digital and hard copy formats which meet user-defined Data Quality Objectives (DQO) and standards.
- Identify and incorporate appropriate DQOs for software and application development/maintenance of such programs. Develop data dictionary/meta data results for all applications and data collected.
- Identify/develop data sort/report generation capabilities appropriate for all program support activities.
- Provide data and report analysis for all data collected.
- Provide analysis of data utilization.

E. TRAINING

The contractor shall support EPA in the following tasks:

- Develop and provide training to federal, state, Tribal, and local response organizations related to the activities described in this SOW.
- Support EPA with schedule preparation and conducting training sessions.
- Provide industry standard classes such as 40-hour HAZWOPER and 8-hour annual refresher training, etc.

F. LOGISTICAL SERVICES

The contractor shall support EPA in the following tasks:

- Provide site security to prevent unauthorized access of any persons or animals to preserve public safety.
- Provide on-site field support storage for equipment and supplies.
- Provide site communications such as radios, repeaters, commercially available radio systems, and satellite telephones.
- Provide secured/fenced single entry access. If required to secure site, fencing shall be a minimum of six feet (6 ft.) in height unless otherwise note.
- Provide storage PODs, large conex boxes for storage or other equivalent storage.
- Provide temporary on-site sample processing area with electrical and water utilities.
- Provide field office trailer(s) equipped with general office furniture (i.e. desks and chairs), WiFi connection, and electricity/water utilities;
- Small scale access improvements such as grading and culvert crossing.
- Portable Toilets.
- Provide Utility Task Vehicles.
- Provide All-Terrain Vehicles
- Provide trash storage and removal services.
- Provide temporary external electrical hookups for specialized vehicles or equipment.

The Contractor shall not enter into a lease agreement on behalf of the Government. Any agreement with third party interests for applicable emergency facilities (for example: conference, meeting, planning, lodging space) shall be between the contractor and the facility provider. Any such space or facility will be the contractor's responsibility, billable as an Other Direct Cost. Approval from the Contracting Officer must be obtain prior to the agreement date.

Exhibit B – Specific Tasks List (Module 2)

This list of contract services does not encompass all possible cultural and community support activities, but is an extensive sample of types of activities that may be required under this contract. More specific requirements and tasks will be outlined in the site specific Task Orders issued under this contract. This exhibit structure does not preclude using a task in any other contract activity.

The contractor shall support EPA in the following tasks:

- Cultural Resources

A. Cultural Resources

- Coordinate with state, Federal, and Tribal Cultural Resource Trustees.
- Consult with the THPO (Navajo Nation Historic Preservation Department [HPD]) before undertaking any invasive field activities.
- Provide field support to EPA to comply with protectiveness requirements identified by HPD, including fencing and/or flagging of protected areas and on-site archeologist support.
- Locate and obtain existing cultural surveys.
- Obtain written access to the properties prior to conducting any field activities.
- Compliance with Sec 106 of the NHPA and related federal laws within non-tribal lands in NM and compliance with similar laws in the Navajo Nation.
- Assess potential impacts to historical sites and other cultural resources.
- Generate cultural resources inventories.
- Conduct Cultural Resource Surveys, including community interviews, field surveys, and transects as necessary to fulfill requirements by HPD. Document and evaluate cultural resources.
- Surface collection.
- Identify potential mitigation strategies.
- Develop historic context.
- Ethnohistorical and anthropological research.
- Geographical Information Systems (GIS) Development and Support
- Geoarchaeological investigations.
- Archaeological testing.
- Archaeological data recovery.
- Archaeological monitoring.
- Storm water pollution prevention and erosion mitigation for cultural resources.
- Artifact analyses.
- Technical reporting, submission for review, and response to comments.
- In-field visits.
- Public Outreach

Exhibit C – Statutory and Regulatory Framework

SUPERFUND - GENERAL

This list is a representative sample and is not intended to be all inclusive.

- I. Laws - Statutes
 - Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) (1980), (42 U.S.C. s/s 9601 et. seq.), as amended
 - Superfund Amendments and Reauthorization Act (SARA) (1986)
 - Community Environmental Response Facilitation Act (CERFA) (1992)
 - Asset Conservation, Lender Liability, and Deposit Insurance Protection Act of 1996 (1996)
 - Clean Water Act (CWA) (1972), (33 U.S.C. s/s 1251 et. seq.) - particularly Section 311
 - Resource Conservation and Recovery Act (RCRA), particularly Subtitle I
 - Emergency Preparedness and Community Right-to-Know Act (EPCRA)
 - Homeland Security Act, Public Law 107-296
 - Clean Air Act, (42 USC 85), as amended
- II. Code of Federal Regulations (CFR)
 - National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300
- III. Federal Registers (significant notices)
 - 50 FR 47912; November 20, 1985 - NCP Final Rule (revisions added by CERCLA)
 - 55 FR 8666; March 8, 1990 - NCP Final Rule (revisions added by SARA)
 - 59 FR 47384; September 15, 1994 - NCP Final Rule (revisions added by OPA)
- IV. Executive Orders (EO) and Presidential Decision Directives (PDD)
 - EPA's homeland security priorities are based largely on responsibilities outlined in HSPDs at <http://www.epa.gov/homelandsecurityportal/laws-hspd.htm>. The following have specific EPA tasking:
 - HSPD - 12, Policies for Common Identification Standard for Federal Employees and Contractors, 22 August 2004.
 - a. HSPD-20: National Continuity Policy, May 2007
- V. Policies and Guidance

- CERCLA/Superfund Orientation Manual, EPA Document Number: 542-R-92-005, URL: (<http://www.epa.gov/superfund/policy/remedy/pdfs/542r-92005-s.pdf>)

VI. Other References and Resources

- Superfund Home Page, URL: <http://www.epa.gov/superfund/> Superfund 30th Anniversary Report, URL: <http://www.epa.gov/superfund/30years/>

DISCOVERY & NOTIFICATION

I. Laws - Statutes

- Section 103 of CERCLA as amended
- Section 304 of EPCRA (1986)
- Section 311 of CWA, as amended by the OPA

II. CFR

- 40 CFR Part 302 - Designation, Reportable Quantities, and Notification
- 40 CFR Part 355 - Emergency Planning and Notification
- 40 CFR 300.405 - Discovery and Notification (Hazardous Substances)

III. Federal Registers (significant notices)

- 46 FR 22144 - April 15, 1981 - Hazardous Substances Notification of Treatment, Storage, and Disposal Facilities
- 50 FR 13456 - April 4, 1985 - Release Notification Requirements for CERCLA
- 52 FR 13378 - April 22, 1987 - Release Notification Requirements for EPCRA
-

IV. Other Resources

- Emergency Response Program Reporting URL: <http://www.epa.gov/epahome/violations.htm>

REMOVAL PROCESS

I. Laws - Statutes

- Sections 101 and 104 of CERCLA (definition of and authority for removal response)
- Section 113 of CERCLA (documentation requirements)
- Section 311 of the CWA, as amended by the OPA

II. CFR

- 40 CFR 300.410 - Removal Site Evaluation (Hazardous Substances)
- 40 CFR 300.415 - Removal Action (Hazardous Substances)
- 40 CFR Part 300 Subpart D - Operational Response Phases for Oil Removal

III. Federal Registers (significant notices)

- 55 FR 8666: March 8, 1990 - NCP Final Rule (revisions added by SARA)
- 59 FR 47384: September 15, 1994 - NCP Final Rule (revisions added by OPA)

IV. Policies and Guidance

- Superfund Removal Procedures OSWER, Directive Number: 9360.0-03B
Guidance on Conducting Non-Time Critical Removal Actions Under CERCLA, Document Number: EPA 540-R-93-057, OSWER Directive Number: 9360.0-32
- Guide to Developing Action Memorandums, OSWER Directive Number: 9360.3-01FS
- Model Program for Removal Site File Management, OSWER Directive Number: 9360.2-01
- Superfund Fact Sheet: The Removal Program, OSWER Directive Number: 9320.0-05FSg
- Consideration of ARARs during Removal Actions, OSWER Directive Number: 9360.3-02 FS

V. Other Resources

- Superfund Office of Solid Waste and Emergency Response,
<http://www.epa.gov/superfund/partners/osrti/index.htm>

COMMUNITY INVOLVEMENT

I. Laws - Statutes

- Section 113 of CERCLA

II. CFR

- 40 CFR 300.415(n) - Community Relations in Removal Actions
- 40 CFR 300.430(c) - Community Relations in Remedial Actions
- 40 CFR 300.430(e)(2)(iv) - Technical Assistance for Communities
- 40CFR 300.800 - Administrative Record

III. Federal Registers (significant notices)

- 55 FR 8666; March 8, 1990 - NCP Final Rule (revisions added by SARA)

IV. Policies and Guidance

- Superfund Community Involvement Handbook, Document Number: 540-K-01-003
- Superfund Removal Procedures: Public Participation Guidance for On-Scene

Coordinators: Community Relations and the AR, OSWER Directive Number 9360.3-05

- Risk Assessment Guidance for Superfund: Volume 1, Human Health Evaluation Manual, Part A: Community involvement in Superfund Risk Assessments, Document Number: EPA 540-R-98-042
- Superfund Technical Assistance Grants, OSWER Directive Number: 9230.1-05FSA

V. Other Resources

- Superfund Community Involvement Home Page URL:
www.epa.gov/superfund/community/index.htm

HUMAN HEALTH/ECOLOGICAL RISK ASSESSMENT

For Baseline Human Health Risk Assessments:

- Risk Assessment Guidance for Superfund (RAGS), Volume I: Human Health Evaluation Manual: Part A, Baseline Risk Assessment. Interim Final. December 1989. EPA 540/1- 89/002. NTIS PB90-155581.
- Supplement to Part A: Community Involvement in Superfund Risk Assessments. March, 1999. EPA 540-R-98-042. OSWER Directive 9285.7-01E-P. NTIS PB99-963303.
- Part B, Development of Risk-Based Preliminary Remediation Goals. December, 1991. EPA 540/R-92/003. OSWER Directive 9285.7-01B. NTIS PB92-963333.
- Part C, Risk Evaluation of Remedial Alternatives. December 1991. EPA/540/R- 92/004. OSWER Directive 9285.7-01C. NTIS PB92-963334.
- Part D, Standardized Planning, Reporting and Review of Superfund Risk Assessments. January 1998. EPA 540-R-97-033. OSWER Directive 9285.7-01D. NTIS PB97-963305.
- Risk Assessment Guidance for Superfund, Volume III - Part A, Process for Conducting Probabilistic Risk Assessment. December, 2001. EPA 540-R-02-002. OSWER Directive 9285.7-45. NTIS PB2002 963302.
- Supplemental Guidance to RAGS: Calculating the Concentration Term. June 22, 1992. OSWER Directive 9285.7-08I.
- Standard Default Exposure Factors. Interim Final. OSWER Directive 9285.6-03. March 25, 1991.
- Final Guidance Data Usability in Risk Assessment (Part A). April 1992. OSWER Directive 9285.7-09A. NTIS PB92-963356.
- Guidance for Data Usability in Risk Assessment (Part B). May 1992. OSWER Directive 9285.7-09B. NTIS PB92-963362.
- Dermal Exposure Assessment: Principles and Applications. January 1992. EPA 600/8- 91/011B.
- Exposure Factors Handbook, Volume 1. 1997. EPA/600/P-95/002Fa.
- Exposure Factors Handbook, Volume 2. 1997. EPA/600/P-95/002Fb.
- Exposure Factors Handbook, Volume 3. 1997. EPA/600/P-95/002Fc.

- Air/Superfund National Technical Guidance Study Series, Volumes I, II, III, and IV. 1989. EPA 450/1-89-001,002,003,004.
- Final Soil Screening Guidance, May 17, 1996. Soil Screening Guidance User's Guide. Office of Solid Waste and Emergency Response. EPA/540/R-96/018.
- Soil Screening Guidance: Technical Background Document. EPA 540/R-94/126.
- EPA Risk Characterization Program. Memorandum from Administrator Carol Browner. Office of the Administrator, Washington, DC. March 21, 1995.
- Provisional Guidance for Quantitative Risk Assessment of Polycyclic Aromatic Hydrocarbons. Office of Research and Development, Washington, DC. EPA/600/R-93/C89.PCBs: Cancer Dose-Response Assessment and Application to Environmental Mixtures. Office of Research and Development, Washington, DC. EPA/600/P- 96/001A.
- PCBs: Cancer Dose-Response Assessment and Application to Environmental Mixtures. Office of Research and Development, Washington, DC. EPA/600/P-96/001A.
- Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities. July 14, 1994. OSWER Directive 9355.4-12.
- Calculating Upper Confidence Limits for Exposure Point Concentrations at Hazardous Waste Sites. December, 2002. OSWER Directive 9285.6-10.

For Baseline Ecological Risk Assessments:

- Guidelines for Ecological Risk Assessment, Final. April 1998. EPA/630/R-95-002F.
- Ecological Risk Assessment Guidance for Superfund, Process for Designing and Conducting Ecological Risk Assessments. June 1997. EPA/540-R-97-006. OSWER Directive 9285.7- 006. NTIS PB97-963211.
- Ecological Risk Assessment / Management Principles. October, 1999. OSWER Directive 9285.7-28P.
- Ecological Assessment of Hazardous Waste Sites: A Field and Laboratory Reference Document. EPA 600/3-89/013. March 1989.
- EcoUpdate: Intermittent Bulletins, Supplemental Guidance to RAGS, Vol. II. EPA Publications 9345.0-051.

NAVAJO NATION REGULATIONS INCORPORATED BY REFERENCE

- Navajo Preference and Employment Act (NPEA)
- Dine Fundamental Law
- Navajo CERCLA

Exhibit D – Acronyms

AR	Administrative Record
ARARs Requirements	Applicable or Relevant and Appropriate Requirements
AUMs	Abandoned Uranium Mines
BIA	Bureau of Indian Affairs
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CERCLIS	Comprehensive, Environmental Response, Compensation & Liability Information System
CFR	Code of Federal Regulations
CO	Contracting Officer
COR	Contracting Officer's Representative
CPPA	New Mexico Cultural Properties Protection Act
CRPA	Navajo Nation Cultural Resources Protection Act
CWA	Clean Water Act
DMP	Data Management Plan
DOE	Department of Energy
DOT	Department of Transportation
DQO	Data Quality Objectives
EE/CA	Engineering Evaluation/Cost Analysis
EO	Executive Order
EPA	Environmental Protection Agency
ESI	Expanded Site Inspection
ESI/RI	Expanded Site Inspection and Remedial Investigation
FOIA	Freedom of Information Act
GFP	Government Furnished Property
GIS	Geographical Information System
HASP	Health and Safety Plan
HAZWOPER	Hazardous Waste Operations and Emergency Response
HPD	Historic Preservation Department
IA	Integrated Assessment
IHS	Indian Health Services
NAGPRA	Native American Graves Repatriation Act
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NEPA	National Environmental Protection Act
NHPA	National Historic Preservation Act
NIOSH	National Institute for Occupational Safety and Health
NPL	National Priorities List
NRC	Nuclear Regulatory Commission
NRT-1	National Response Team Hazardous Materials Emergency Planning Guide, March 1987
NRT-1A	National Response Team Criteria For Review Of Hazardous Materials Emergency Plans, May 1988
OPM	Office of Personnel Management
OSC	On-Scene Coordinator

OSHA	Office of Safety and Health Administration
OSWER	Office of Solid Waste and Emergency Response
POLREP(s)	Pollution Report(s)
PA	Preliminary Assessment
PA/SI	Combined Preliminary Assessment and Site Inspection
PDD	Presidential Decision Document
PPE	Personal Protection Equipment
PRP	Potentially Responsible Party
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
RA	Removal Assessment
RAES	Response Assessment and Evaluation Services
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
RPM	Remedial Project Manager
SARA	Superfund Amendments and Re-authorization Act
SI	Site Inspection
SIP	Site Inspection Prioritization
SOW	Statement of Work
SR	Site Reassessment
START	Superfund Technical Assessment & Response Team
TARS	Technical Assessment and Removal Support
THPO	Tribal Historic Preservation Officer
USCG	United States Coast Guard
VPC	Virtual Private Cloud

Exhibit E – Levels of Personal Protective Equipment

Personal Protection Equipment (PPE) requirements are determined by the NIOSH/OSHA USCG/and the EPA Occupational-Safety and Health Guidance Manual for Hazardous Waste Site Activities issued in October 1985. Download :

<https://www.osha.gov/Publications/complinks/OSHG-HazWaste/all-in-one.pdf>

Additional guidance is given in EPA Standard Operating Safety Guides, Publication 9285.1-03, dated June 1992. These guidance documents, or their updated versions, will be the final determination for personal protection guidance in this contract. All equipment associated with a particular level of protection, or modified level of protection, is to be supplied by the contractor for each site. Details of the appropriate level of protection will be covered in the HASP.

1. LEVEL C

- Full-face, air purifying respirator, (MSHA/NIOSH) approved
- Chemical-resistant clothing
 - One piece coverall;
 - Hooded, Two piece chemical splash suit;
 - Hood and apron;
 - Disposable coveralls*
 - Gloves (outer)
 - Gloves (inner)
 - Boots, steel toe and shank
 - Boots (outer) (disposable)*
- Hard hat (face shield*)
- Escape mask*
- 2-way radio communications (intrinsically safe)

2. LEVEL D

- Coveralls
- Gloves
- Boots/shoes, safety or chemical-resistant steel toe and shank
- Boots (outer) chemical-resistant, disposable*
- Safety glasses or chemical splash goggles*
- Hard hat (face shield)*
- Escape mask*

* Optional at the discretion of the OSC or RPM.

Exhibit F – EPA Regional Offices

EPA has two regional offices under this SOW. Each Regional Office is responsible within its states for the execution of the EPA's programs.

Region 6	New Mexico (non-tribal Navajo Area Uranium Mines)
Region 9	Arizona and Navajo Nation (Navajo Area Abandoned Uranium Mines)

Exhibit G – Levels of Personnel Background Check and Drug Screening for Contractor Employees

The contractor shall provide qualified personnel that meet the background check and drug screening requirements established below. The EPA has established two levels of criteria. The Level 1 background check criteria apply to all contractor employees working at a response site. Level 2 contains background check criteria and drug screening requirements that apply to all contract employees working at sites that are designated by EPA as “Sensitive Sites.” Examples of such sites include those that involve law enforcement activities, apparent or suspected terrorist activities, any indoor cleanups (including private residences), drug lab cleanups, and response actions at geographically sensitive locations such as military installations and government buildings. The Contracting Officer or OSC/RPM will notify the Contractor whenever EPA designates a response site as a sensitive site. The designation will be provided to the Contractor in the task order, work assignment, or verbally, as the situation warrants. If a background check has been performed within one (1) year prior to the requirement for the background check, the contractor need not conduct another background check.

LEVEL 1 - EPA Background Check Criteria:

- Can be a non U.S. citizen with a valid visa.
- No convictions for crimes involving issues of National Security. A "national security crime" is defined as any criminal activity involving espionage or foreign aggression against the United States, intelligence or counterintelligence activities, including development of defense plans or policies, concerned with undermining or overthrowing the government of the United States and unlawful handling or disclosure of classified information.
- No weapons offense in the last five (5) years.
- No felony conviction in the last three (3) years.
- Not a fugitive from justice.
- Not listed in the Excluded Parties Listing System (EPLS). EPLS is a web-based database that identifies parties excluded throughout the U.S. Government from receiving federal contracts or subcontracts. The EPLS is available at: <http://epls.gov>.

LEVEL 2 - EPA Background Check Criteria for Sensitive Sites:

- Must be a U.S. citizen.
- No convictions for crimes involving issues of National Security. A "national security crime" is defined as any criminal activity involving espionage or foreign aggression against the United States, intelligence or counterintelligence activities, including development of defense plans or policies, concerned with undermining or overthrowing the government of the United States and unlawful handling or disclosure of classified information.
- No weapons offense in the last ten (10) years.
- No felony conviction in the last seven (7) years.
- No misdemeanor conviction in the last five (5) years.
- No convictions for three (3) separate offenses in the last ten (10) years (excluding traffic offenses).
- Not a fugitive from justice.
- Not listed in the Excluded Parties Listing System (EPLS). EPLS is a web-based database that identifies parties excluded throughout the U.S. Government from receiving federal contracts or subcontracts. The EPLS is available at: www.epls.gov.

- Drug Screening at Sensitive Sites:

Contractor employees working at designated “Sensitive Sites” must pass, within the previous 90 calendar days, a drug test for the presence of marijuana, cocaine, opiates, amphetamines, and phencyclidine (PCP) in conformance with the Mandatory Guidelines for Federal Workplace Drug Testing Programs first published by the Department of Health and Human Services in the Federal Register on April 11, 1988 (53 FR 11979, and revised on June 9, 1994 (59 FR 29908), on November 13, 1998 (63 FR 63483), and on April 13, 2004 (69 FR 196440); and Procedures for Transportation Drug Testing Programs, 49 CFR Part 40. References to “DOT “shall read, as “EPA” and the split sample method of collection shall be used.

The requirements in Level 1 or 2 may be waived by the Contracting Officers, on a case-by-case basis, at a specific location, or for a specific individual.

If the results of an employee’s background check or drug screening do not meet the criteria in either level 1 or 2, as required, the Contractor may apply for a waiver. To initiate the waiver process, the contractor must submit, in writing, the background report or drug test on the employee and an explanation of the need for the employee for approval by the Agency before the employee performs contract services for EPA. The contracting officer will notify the contractor of the Agency decision within five (5) days of receipt of the contractor’s request for a waiver.

Exhibit H- Agency Security Requirements for Contractor Personnel

To safeguard the EPA workforce and comply with Homeland Security Presidential Directive 12 (HSPD-12), Executive Order (E.O.) 13467, E.O. 13488 and Office of Personnel Management (OPM) regulations, the EPA requires the following:

- **For Unescorted Access for 6 Months or Less**

Contractor employees needing unescorted physical access to a controlled EPA facility¹ for 6 months or less must be determined by the EPA to be fit before being issued a physical access badge (picture ID). A fitness determination is, per E.O. 13488, a decision by an agency that an individual has or does not have the required level of character and conduct necessary to perform work for or on behalf of a federal agency as a contractor employee. A favorable fitness determination is not a decision to contract with an individual. Contractor employees must undergo, at a minimum, an FBI fingerprint check of law enforcement and investigative indices (see Section 2).

- **For Unescorted Access for More than 6 Months**

Contractor employees needing unescorted access to a controlled EPA facility for more than 6 months are required to have an HSPD-12 smart card, called an EPASS badge. Eligible contractor employees must have a completed or initiated background investigation at the National Agency Check and Inquiries (NACI) level or above, comply with all other investigative and HSPD-12-related requirements, and be determined by the EPA Personnel Security Branch (PSB) to be fit (see Section 3). “Initiated” means that all initial security requirements have been met (paperwork is completed, submitted, and PSB-approved; favorable fingerprint results have been received; funding has been provided to cover the cost of the investigation; and PSB has sent notification that the individual may begin work).

To ensure timely contract performance, the contractor must be prepared to immediately submit upon contract award the contractor employee information detailed in Section 1.c. This applies also to incumbent contractors’ employees for follow-on acquisitions. All contractor employees under a new contract are subject to the requirements in Sections 2 or 3; however, the time needed to meet security requirements may be shorter for personnel who already have a favorable fitness determination.

Contractor employees may begin work on the contract start date provided all applicable documentation in Sections 1, 2, and 3 has been received by EPA and there is no derogatory information to preclude a favorable determination. Timely submission of contractor employees’ security forms and other required documentation is essential.

A favorable determination may be revoked at any time should EPA discover derogatory information that deems a contractor employee unfit. Contractor employees deemed unfit will not be allowed to continue under the contract, and the contractor will be responsible for providing replacements acceptable to EPA.

EPA may make a determination of a contractor employee’s fitness at any of the following points:

- When EPA prescreens the individual’s security forms. “Red flag” issues include:

¹ A controlled facility is an area to which security controls have been applied to protect agency assets. Entry to the controlled area is restricted to personnel with a need for access.

- Having been fired from a previous job or having left under unfavorable circumstances within the past 5 years (or longer, depending on the security form questions and type of investigation);
 - Failure to register with the Selective Service System (applies to male applicants born after December 31, 1959);
 - Within the past 5 years (or longer, depending on the security form questions and type of investigation), any arrest, charge, or conviction that has been upheld for violent or dangerous behavior or a pattern of arrests that demonstrates disregard for the law; or Illegal drug use within the previous year, or drug manufacture or other involvement for profit within the past 5 years (or longer, depending on the security form questions and type of investigation).
- When FBI fingerprint results are returned to the EPA;
 - When OPM returns the individual's investigative results to the EPA; and
 - When the EPA becomes aware that the contractor employee may not be fit to perform work for or on behalf of a federal agency. The contractor is responsible for monitoring its employees' fitness to work and notifying the EPA immediately of any contractor employee arrests or illegal drug use.

Initial Contractor Requirements

This section contains the contractor's initial security requirements, which must be met before contractor employees can perform work **on-site** at EPA under this contract.

- The contractor must identify a point of contact (POC) and alternate POC to facilitate security processes.
- The contractor must ensure that all foreign nationals who will work under this contract have a valid U.S. Immigrant Visa or nonimmigrant Work Authorization Visa. The contractor must use E-Verify to verify employment eligibility as required by the FAR.
- EPA requires contractor employee information for the investigative and EPASS processes. Immediately upon contract award or anytime new personnel are brought onboard, the contractor POC must log on to a secure, EPA-identified portal, create an account, and submit complete contractor employee information: Full name (as found on employment records and driver's license), Social Security number, date of birth, place of birth (city, state, country), citizenship, employee email address, EPA Program Office or Regional Office, and EPA work city and state. Note: Incomplete names, inaccurate names, and nicknames are unacceptable and may delay contractor employees' start date. Instructions and the portal link will be provided upon contract award.
- EPA will provide the login information for the portal. After submission of the contractor employees' data, the COR will notify the contractor POC if additional information or corrections are required. The COR's approval of the information triggers the investigative and EPASS processes.

Requirements for Contractor Employees Needing Unescorted Access for 6 Months or Less

- This section contains the requirements for contractor employees who are not eligible for an EPASS badge but who need unescorted physical access. The minimum security requirement is an FBI fingerprint check.
 - Before the contractor employee can begin work on-site at the EPA:
 - He/she must be fingerprinted by the EPA; arrangements will be made by the COR.
 - The contractor employee must satisfactorily respond to all questions/information requests arising from the EPA's review of the fingerprint results.
 - EPA must determine that the fingerprint results are favorable.
- Once all requirements in Section 2(a) are met, the COR/PO and contractor employee will be notified that the contractor employee can start work. Contractor employees will be issued a physical access badge and may work on-site at EPA. Contractor employees must sign a receipt acknowledging responsibility to safeguard the badge and surrender it when required (see Section 4.b).

Requirements for Contractor Employees Needing Unescorted Access for more than 6 Months

This section contains the requirements for contractor employees who are eligible for an EPASS badge and who must have, at a minimum, a NACI background investigation completed or initiated. Contractor employees needing access to sensitive information or otherwise occupying moderate or high-risk positions must undergo an investigation above the NACI level. The EPA will assign a position risk level to each position on the contract and identify which contractor employees are EPASS-eligible.

- EPASS-eligible contractor employees must undergo a background investigation appropriate to the risk level of the position occupied, as specified by the EPA; the minimum acceptable investigation is a NACI.
- Employees who have previously undergone a federal background investigation at the required level and who have worked for or on behalf of the federal government without a break in service since the investigation was completed may not need a new investigation. EPA will verify the investigative information and notify the contractor employee and COR if a new investigation is required. If an investigation is not needed, the contractor employee must still be fingerprinted by EPA for an FBI fingerprint check and have favorable fingerprint results returned before beginning work on-site at EPA.
- Before beginning work on-site at EPA, contractor employees who require a new background investigation must:
 - Complete and submit the appropriate OPM security questionnaire specified by the EPA via OPM's e-QIP system. Access to e-QIP will be provided by EPA; the questionnaires are viewable at www.opm.gov/forms. Foreign national contractor employees must, on the security questionnaire, provide their alien registration number or the number, type, and issuance location of the visa used for entry to the United States.

- For a NACI only, also complete the OF 306, Declaration for Federal Employment, as required by OPM for any NACI and available at http://www.opm.gov/forms/pdf_fill/of0306.pdf. Contractor employees must answer questions 1-13 and 16, then sign the form on the “Applicant” line, 17a.
 - Follow all instructions on the form(s), answer all questions fully, and submit signature pages as directed by EPA.
 - Be fingerprinted by EPA; arrangements for fingerprinting will be made by the COR.
 - Satisfactorily respond to all questions/information requests arising from EPA’s review of the forms or fingerprint results.
 - Receive favorable fingerprint results.
- Once all requirements in Section 3(c) are met, the COR/PO and contractor employee will be notified that the contractor employee can start work. Contractor employees may work on-site at EPA while OPM conducts the background investigation.
 - At a time and location specified by the EPA, contractor employees must report in person for EPASS identity (ID) proofing and show two unexpired forms of identification from the lists on Department of Homeland Security Form I-9. At least one of the documents must be a valid, unexpired state or federal government-issued photo ID; non-U.S. citizens must show at least one ID from Column A on Form I-9.
 - Before being issued an EPASS badge, contractor employees must sign a receipt acknowledging responsibility to safeguard the badge and surrender it when required (see Section 4.b). Contractor employees must meet all EPASS badge life-cycle requirements.
 - A contractor employee has the right to appeal, in writing through the contractor POC to the COR, the denial or revocation of an EPASS badge. If the COR believes the appeal is justified, he/she will forward it to the Security Management Division (SMD). SMD’s decision on behalf of the EPA will be final.

Ongoing Contractor Security Responsibilities

- The contractor POC must immediately provide updated information via the secure portal when new contractor employees are added to the contract. These contractor employees must meet all initial investigative requirements before beginning work on-site at EPA. The contractor POC must also update information via the secure portal whenever a contractor employee leaves the contract.
- The contractor POC must ensure that all EPA physical access and EPASS badges are returned to the COR as soon as any of the following occurs, unless otherwise determined by the Agency: (i) when the badge is no longer needed for contract performance; (ii) upon completion of a contractor employee’s employment; (iii) upon contract completion or termination.
- These EPA security requirements must be incorporated into all resulting subcontracts wherein contractor personnel working under the subcontract require EPA physical access.