

5A100



000061814

STATEMENT OF WORK FOR
OPERABLE UNIT 7
PRESENT LANDFILL (IHSS 114)
AND
INACTIVE HAZARDOUS WASTE STORAGE AREA (IHSS 203)

PREPARED BY
EG&G ROCKY FLATS INC.
ENVIRONMENTAL RESTORATION MANAGEMENT
May, 1994

REVISION 2

Approved RPM Director W. J. [Signature]

Date 5-2-94

Approved QA [Signature], ERS

Date 5-2-94

RECEIVED
RECORDS CENTER

ADMIN RECCRD

BZ-A-000406

1/26

1.0 Objective

The objective of this statement of work (SOW) is to integrate existing activities for Operable Unit 7 (OU 7), Present Landfill with revised scope resulting from current negotiations between DOE-RFO, the Colorado Department of Health (CDH) and the Environmental Protection Agency, Region VIII (EPA). Work conducted under this SOW supports EG&G Rocky Flats' efforts to implement the Rocky Flats Interagency Agreement (IAG).

2.0 Scope

The scope of this addendum is to identify and implement new scope for Operable Unit 7 (OU 7), Present Landfill. The tasks detailed below have been identified as a result of new guidance from the agencies and DOE stemming from direct negotiations for this OU. This effort involves the modification of the Phase I RFI/RI Field Sampling Plan, implementation of the revised field sampling plan, development of the Interim Measure/Interim Remedial Action (IM/IRA) Decision Document, and remedial design. These modifications are a result of an integration of Phase I and Phase II pathways identified in the conceptual model detailed in Technical Memorandum 1, Exposure Scenarios for OU 7 and current re-scoping activities being conducted with the agencies. New tasks include modification and implementation of pertinent sections of the Phase I RFI/RI Work Plan as well as IM/IRA development and design. All tasks have been discussed with DOE/RFO as well as the technical oversight representatives from the Agencies. Tasks originally supporting the development of a Phase I RFI/RI Report will now support the development of an Interim Measure/Interim Remedial Action Decision Document (IM/IRA DD).

3.0 Applicable Document Guidance

The subcontractor shall utilize, but not be limited to, the following regulatory documents and any references (latest editions) cited therein while implementing this SOW :

Rocky Flats Interagency Agreement, January 22, 1991

EG&G, Rocky Flats, Inc., Final Phase I RFI/RI Work Plan for OU7, Present Landfill, December, 1992

EG&G, Rocky Flats, Inc., Proposed Interim Measure/Interim Remedial Action Decision Document for the Solar Evaporator Ponds Operating Unit No. 4., April 1992

EG&G, Rocky Flats, Inc., Annual Report: Sitewide Treatability Studies, March 1992

EG&G, Rocky Flats, Inc., Historical Release Report for the Rocky Flats Plant, June 1992

EG&G, Rocky Flats, Inc., Background Geochemical Characterization Report, September 1993

US Department of Energy, Rocky Flats Plant, Draft Integration of NEPA, CERCLA, and RCRA for Activities Under the Interagency Agreement at Rocky Flats Plant, June 1992

US EPA, Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim Final, EPA 540 G-89-004, October 1988

2

US EPA, Data Quality Objectives for Remedial Response Activities, Development Process, March 1987

US EPA, Data Quality Objectives for Remedial Response Activities, Example Scenario, March 1987

US EPA, Guidance for Data Usability in Risk Assessment, October 1990(or latest edition)

US EPA, Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual, (Part A), Interim Final, EPA 540/1-89/002, December 1989

US EPA, Risk Assessment Guidance for Superfund, Volume II, Environmental Evaluation Manual, Interim Final, EPA/540/1-89/001, March 1989

US EPA, Ecological Assessments of Hazardous Waste Sites: A field and Laboratory Reference, EPA/600/3-89/013, March 1989

US EPA, Guideline for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, EPA/540/2-058, December 1989

Code of Federal Regulations, Title 40, Part 265 - Interim Status Standard for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities, July 1990

Code of Federal Regulations, Title 43, Part 11 - Natural Resource Damage Assessments, October 1987 (or latest edition)

Phase I RFI/RI Work Plan For Operable Unit 7 Present Landfill IHSS 114 and Inactive Hazardous Waste Storage Area IHSS 203, September 1992 (Including Draft Technical Memoranda for OU 7)

4.0 TASKS

Task 4.1 Finalize OU 7 Phase I RFI/RI Work Plan Modification

The subcontractor shall finalize this technical memorandum per DOE HQ and DOE-RFO as well as EPA/CDH comments on the draft The Phase I RFI/RI Work Plan which was modified to reflect the following:

- Changes to Section 7, Field Sampling Plan (FSP), to reflect additional field activities necessary to support agency approved revised DQO's.
- Changes to the DQO section of the work plan as modified as a result of Task 4.1.
- Modifications to any other section of the work plan such as QA/QC, PARCC, HHRA, EE as necessary to support the revised DQO's.
- Data evaluation of Phase I RFI/RI data to support the proposed scope of the tech memo.

The format of this revision shall be via technical memorandum and as such will require at least

two review and revision cycles as well as agency and DOE briefing meetings. The final proposed scope shall be developed per guidance from negotiations between EG&G and DOE and the regulatory agencies, be reviewed by EG&G and DOE technical staff, and approved by the EG&G project manager and all IAG signatories.

Task 4.2 Revised Field Sampling Plan Implementation

Upon approval by DOE, CDH, and EPA of the revised field sampling plan, the field operations shall be implemented to achieve the agency approved DQO's. Operations shall be conducted in accordance with applicable EG&G Standard Operating Procedures (SOP's) including but not limited to all ER field, quality, and administrative SOP's. For the purpose of this request for proposal, all field cost and resource estimates shall be broken down into the following major categories:

- Drilling, including monitor well installation and soil borings
- Soil and Sediment sampling
- Groundwater sampling
- Surface water sampling

The subcontractor shall perform the RFI/RI Investigation field work in accordance with the Work Plan Implementation Plan, the Revised Field Sampling Plan, pertinent sections from the Original Work Plan, the IAG, this SOW, and supporting procedures.

All schedules, cost breakdowns, and task reports shall be developed on a task by task basis. The attached work breakdown structure provides guidance as to how the baseline schedule and costs shall be detailed for any proposal, status reports, and other documentation associated with this project.

Task 4.3 Baseline Risk Assessment

The Baseline Risk Assessment shall be completed in accordance with the most current agreements negotiated between IAG signatories for program level methodologies (background comparisons and data aggregation) as well as OU 7 specific guidance. The three areas to be evaluated for the BRA shall be divide as follows:

- 4.3.1. Present Landfill
- 4.3.2. East Landfill Pond sediment and surrounding soils.
- 4.3.3. OU 7 groundwater.

The subcontractor shall also comply with up-to-date regulatory guidance for risk assessment at RFP. The BRA is divided into a Human Health and Risk Assessment (HHRA) and an Environmental Evaluation (EE). This task, as a minimum, shall conform with specifications for BRA deliverables defined in the Federal Facility Agreement Statement of Work, Attachment 2, Sections VII.D.1 and VIII of the IAG.

Guidelines for Performing the BRA

The BRA must satisfy two major and potentially competing criteria.

The subcontractor shall assist EG&G in developing a realistic risk assessment that reflects this concept of risk assessment and risk management. In general, this will require critical interpretive rationale and creative thinking. Subcontractors schooled in EPA-stylized thinking processes will have to demonstrate their ability for creative scientific thought first, followed by Agency guidance rationale.

First, the BRA shall reflect current guidance provided by the EPA for two main reasons: (1) the NCP requires that requirement, and (2) it is unlikely that the agency will accept a BRA that does not meet the minimum requirements of the NCP as well as any region-specific guidance. Agency guidance, if followed closely, will result in a biased assessment owing to the tendency to introduce conservative bias through "errs on the side of safety". The subcontractor shall provide a product that can be audited by the agency reviewers against agency BRA requirements.

Second, the BRA shall provide a critical assessment of risk so that the risk management decision maker can obtain a complete view of the site related risk, including but not limited to an analysis of the uncertainties, biases, and limitations of the risk assessment. This is necessary to ensure that the decision maker is presented a balanced perspective from which to base responsible risk management decisions.

The basis for delineating these two requirements stems from guidance provided by the National Academy of Sciences (NAS) which strongly recommends segregating "risk assessments" from "risk management". NAS views risk assessment as characterization of the potential adverse effects of human exposure to environmental hazard including a characterization of the uncertainties inherent in the process. Risk management, according to NAS, is a decision-making process that entails consideration of political, social, economic, and engineering information with risk assessment information to develop, analyze, and compare regulatory options and to select the appropriate response. Agency risk assessment guidance violates this segregation principle by introducing a conservative bias into the analysis through applying "errs on the side of safety" to bridge uncertainty gaps. "Errs on the side of safety" constitute practicing risk management at the risk assessment stage.

Conceptually, these competing objectives require that the risk assessment be conducted initially with an unbiased perspective. After the unbiased assessment and uncertainty analysis are performed, the agency-oriented approach is applied through construction of the Reasonable Maximum Exposure (RME) scenario.

In reality, this is not a two-step process; rather, it is done in a combined

method mode by performing parallel computations.

The subcontractor may refer to documents in Table 1 in implementing the work outlined for the Public Health BRA. Table 1 may not be all inclusive with regard to BRA reference documents.

Technical Requirements for HHRA

The HHRA shall be structured according to all of the following five major tasks:

1) Data evaluation and identification of compounds of concern. This task shall include an assessment of data usability, summary of the nature and extent of contamination with respect to source and soils as defined in the IAG, and identification of compounds of concern that are to be evaluated in the BRA. The COC/Data Evaluation Template shall be used for this task.

2) Exposure assessment. This task is normally the most involved and demanding of quantitative techniques in the BRA. Exposure assessment shall include: identification and evaluation of exposed and potentially exposed populations, analysis of exposure pathway contributions, development of current and future-use exposure scenarios, assessment of exposure factors, and assessment of appropriate exposure point concentrations for both current and future-use exposure scenarios. Contaminant transport and fate modeling is performed under this task.

3) Toxicity assessment. The toxicity assessment involves identification of appropriate toxicity benchmarks to be applied in the BRA. Normally, this task consists of a literature review and development of a brief synopsis of the appropriate toxicity information for the compounds of concern. Occasionally, toxicity benchmarks are developed or modified using information obtained from the literature.

4) Risk characterization. Risk characterization integrates the exposure and toxicity assessments under the various exposure scenarios.

5) Uncertainty analysis. The objective of this task is to evaluate the reliability of the BRA as a scientifically credible document. An uncertainty analysis shall be performed to characterize and quantify, to the extent practicable, sources and magnitude of uncertainty in the BRA. Quantitative techniques may include: sensitivity analysis, first-order analysis to evaluate the propagation of errors, or numerical methods such as stratified Monte Carlo sampling.

The BRA shall be presented as a stand-alone section of the RFI/RI report. All supporting figures, tables and references shall be contained in the BRA Supporting appendices shall be included in the RFI/RI appendix.

6

Task 4.3.2 Environmental Evaluation (EE)

An environmental evaluation will be completed for this project. This EE was funded in FY 93 and was incorporated with OU 6. The Environmental Evaluation is included as a subtask under the Baseline Risk Assessment in EG&G's estimate. EG&G listed costs for this task as oversight for the Baseline Risk Assessment. Stoller has broken down the Environmental Evaluation as a separate task in the cost proposal submitted to EG&G.

Task 4.4 Project Management

The subcontractor shall be responsible for all aspects of project management and control for subcontractor personnel. Reporting requirements delineated in this document shall be the basis for project control of cost and schedule. Budget status reports shall be completed monthly by the subcontractor and submitted to CTR by the fifteenth day of each month for the proceeding month's activity. This report shall include earned value statements that will detail the following:

- Budgeted Cost of Work Performed (BCWP)
- Actual Cost of Work Performed (ACWP)
- Budgeted Cost of Work Scheduled (BCWS)

All tasks shall be reported monthly in terms of earned value as required in the original scope of work. New tasks shall be included in a revised work breakdown structure for this subcontract and submitted to the EG&G project manager for review and approval. All costs and reporting shall be done in accordance with the format in Attachment 1. Earned value shall be calculated and reported monthly for every task. These calculations shall be performed at the task level and rolled up to the project level.

The subcontractor shall also be responsible for attending performance meetings with EG&G project team members and/or regulatory agency personnel. Meetings include but may not be limited to bi-weekly meetings with EG&G project management and bi-monthly meetings with EG&G, DOE, and regulatory agency personnel. Typical meetings should not exceed 4 hours in length but may run longer.

The subcontractor shall be responsible for participating in meetings concerning logistical coordination. The subcontractor shall prepare meeting minutes to document all meetings with EG&G project team members and regulatory agency personnel. The typed meeting minutes are due to the CTR within one week of the meeting date. Meeting minutes shall be reviewed and approved by the CTR prior to submission to the project file. The meeting minutes shall be typed in Word Perfect for the Macintosh. Both a hard copy and an electronic copy (3 1/2 " disk) of meeting minutes shall be submitted to the CTR. Project management meetings other than these detailed may be required. Meetings and attendees

shall be approved by the CTR.

Task 4.5 Miscellaneous Tasks

4.5.1 Field Deficiency Resolution

The subcontractor's participation in field management review meetings shall include preparing written responses/corrections of field work deficiencies as determined by regulatory agencies and EG&G and DOE QA/QC audit findings or deficiencies. A schedule for resolving field deficiencies during all aspects of the field programs will be decided upon with the subcontractor immediately following the recognition of the deficiency.

4.5.2 Data Management & Quality

The subcontractor shall attend a briefing to be given by EG&G's Sample Management Organization before sampling activities begin and a briefing before data use and extraction. In accordance with Section 19 of the QAPjP manual, all software used for data management and report generation must be approved by the Sample Management Organization prior to use.

4.5.3 Data Compatibility

The subcontractor shall provide mapping capabilities and/or support to utilize ESRI's ARC/Info Geographic Information Systems (GIS) software to manage all spatially referenced data. Initial Rocky Flats Plant base coverage will be supplied to the subcontractor by EG&G. The subcontractor shall also provide technical experience in using the ARC/Info software for map generation and spatial modelling and exchange digital data with EG&G as defined:

1. All spatial data will have an XY coordinate projection of True State Plane in the Colorado, Central zone with the NAD27 datum.
2. Format of data will be an ARC/Info export file for a UNIX operating system.

The subcontractor shall demonstrate proficiency in the management of sample gathering and data transmission, especially in the areas of accurate utilization and timely transmission of DataCap records to the Rocky Flats Environmental Database System (RFEDS).

4.5.4 Environmental Quality Assurance Briefing

All subcontractor personnel working on tasks described in this SOW shall attend a Quality Assurance briefing to be given by EG&G's Environmental Quality Support department.

Interim Measure/Interim Remedial Action (IM/IRA) Process.

The following is a general description of the work required for the IM/IRA process. It is intended for informational purposes. Detailed task descriptions follow.

- 1) Regulatory Support;
- 2) Applicable Relevant and Appropriate Requirements (ARARs) Development;
- 3) Modeling Support;
- 4) Conceptual Design;
- 5) Data Evaluation (RFI/RI, Historical, OU-6 etc.);
- 6) IM Environmental Assessment (Draft and Final Reports);
- 7) Options Analysis - Sludge Remediation;
- 8) Technology Literature Research.
- 9) Draft IM/IRA Decision Document
- 10) IM/IRA Decision Document Public Responsiveness Summary;
- 11) Final IM/IRA Decision Document
- 12) IM/IRA Work Plan
- 13) Phase I IM/IRA Implementation Document (Title II);
- 14) Final Title II Design with Construction Schedule;

The subcontractor shall be required to support the IM/IRA Program as referenced. The overall objective of this scope of work shall be to close the OU 7 in accordance with the IAG/Colorado Hazardous Waste Act regulations as supported by EPA guidance on "Presumptive Remedies".

Task 4.6 Landfill Leachate Collection IM/IRA

The subcontractor shall prepare an Interim Measure/Interim Remedial Action (IM/IRA) Decision Document in accordance with the DOE decision on Pond Water IM/IRA(Attachment 1). The schedule should also follow with the attached proposed schedule(Attachment 2). This document shall not take into consideration the wetlands replacement and should assume drainage of the pond prior to installation of the leachate collection system if necessary.

The draft IM/IRA Leachate Collection System shall address all hazardous substance source areas with risk levels greater than $10E-6$ evaluated at the source. The proposed IM/IRA Document shall be a concise document that: (1) indicates the objectives of the IM/IRA (Collection and

treatment of landfill leachate); (2) discusses alternatives that were considered; (3) provides the rationale for the alternative selected; (4) presents EPA/CDH approved Applicable, Relevant and Appropriate Requirements (ARAR) and; (5) discusses how the interim remedy selected will be consistent, complementary and integrated with the final landfill closure.

The subcontractor shall be required to incorporate all EG&G, DOE, EPA, and CDH comments into a final proposed Landfill Leachate Collection IM/IRA Decision Document and generate a comment responsiveness summary.

4.6.1 Regulatory Support

The subcontractor shall be required to provide regulatory support relative to the IM/IRA process. An emphasis shall be placed on DOE Orders with consideration given to integration of this IM/IRA process with that of the OU 7 closure IM/IRA. The subcontractor shall be consistent with the regulations enforced within the OU 7 including: RCRA, CERCLA, Land Disposal Regulations(LDRs) and CHWA. Regulatory analysis shall be required for all options evaluated. Support for this task is covered under Task 4.7.1.

4.6.2 Action Specific Applicable Relevant and Appropriate Requirements (ARARs) Development

The subcontractor shall be required to prepare an EPA approved ARAR analysis in support of the Landfill Leachate Collection IM/IRA in accordance with the IAG. The ARARs developed shall augment the agency approved location and chemical specific ARARs and shall also require agency approval. ARARs are currently being developed under task 4.7.2. This scope shall be limited responses specific to task 4.6

4.6.3 Modeling Support

The subcontractor shall be required to provide, as appropriate, numerical or analytical modeling support. Hydrogeologic modeling may be necessary to evaluate the extent of contamination of leachate and effectiveness of leachate collection system.

4.6.4 Conceptual Design

The subcontractor shall be required to prepare a conceptual design in support of the preferred alternative selected in the Landfill Leachate Collection IM/IRA Decision Document. The conceptual design shall be sufficient for supporting the Title I Design.

4.6.5 Data Evaluation

The subcontractor shall be required to evaluate all historical and Phase I data for OU 7, new data collected, and any other existing data applicable to supporting the IM/IRA process. At a minimum, the subcontractor shall be required to utilize the OU7 Phase I RFI/RI, historical, pond characterization, or other previous investigations data to evaluate/select a remedial technology for collection and treatment of the landfill leachate.

4.6.6 Environmental Assessment (EA)

The subcontractor shall perform a National Environmental Policy Act (NEPA), Environmental Assessment (EA) that shall be integrated into the Landfill Leachate Collection IM/IRA Decision Document. Guidance for performing the EA shall be taken from the integration of NEPA, CERCLA, and RCRA for activities under the Interagency Agreement at Rocky Flats Plant".

4.6.7 Options Analysis

The subcontractor shall be required to support an "Options Analysis" for leachate collection and treatment. The options analysis shall take all potentially appropriate remedial alternatives into consideration. The options analysis shall support the Landfill Leachate Collection IM/IRA Decision Document, as appropriate.

4.6.8 Prepare Draft Landfill Leachate Collection IM/IRA Decision Document

The subcontractor shall integrate the above sections into a draft IM/IRA Decision Document in accordance with the IAG. This section shall include a conceptual design (Title I) for collection and treatment of landfill leachate. Draft and final versions will be required.

4.6.9 Public Comment Period Responsiveness Summary

Subsequent to the Landfill Leachate Collection IM/IRA being revised in accordance with the above referenced agencies comments, the CDH/EPA shall open a public comment period for the proposed Landfill Leachate Collection IM/IRA to satisfy the required public comment period of 60 days.

Concurrent with the public comment period as comments are received for the Landfill Leachate Collection IM/IRA, the subcontractor shall develop an IM/IRA Responsiveness Summary in accordance with the RFP IAG and EG&G, DOE, EPA, and CDH. After receipt of the public comments concerning the proposed Landfill Leachate Collection IM/IRA, the subcontractor shall submit a Final Landfill Leachate Collection IM/IRA and Responsiveness Summary for EG&G, DOE, EPA and CDH review and approval in accordance with paragraph 150 of the RFP IAG.

The subcontractor shall be required to support the public comment period associated with the Landfill Leachate Collection IM/IRA. This shall include, but may not be limited to, development of slides/overheads, attending public meetings and addressing questions, preparing narrative description of the selected remedy, etc. In addition, the subcontractor shall be required to prepare a "Landfill Leachate Collection IM/IRA Public Responsiveness Summary" in accordance with the RFP IAG. The responsiveness summary shall become an integrated component of the Landfill Leachate Collection IM/IRA Decision Document. Draft and final versions will be required.

4.6.10 IM/IRA Decision Document Comment Resolution/Revision

The subcontractor shall be required to revise the Landfill Leachate Collection IM/IRA Decision Document in accordance with the comments submitted from EG&G, DOE, EPA, CDH and public comments for incorporation into the Landfill Leachate Collection IM/IRA decision document.

4.6.11 Development of IM/IRA Decision Document

Further development and necessary revisions of the Landfill Leachate Collection IM/IRA Decision Document shall be required by the subcontractor in accordance with previous comments and revisions. This task will develop the final Landfill Leachate Collection IM/IRA decision document for submittal to EG&G.

Task 4.7 IM/IRA Decision Document for Landfill Closure

The subcontractor shall prepare an Interim Measure/Interim Remedial Action (IM/IRA) Decision Document in accordance with the terms and conditions of the Rocky Flats Plant (RFP) Interagency Agreement (IAG) signed by the U.S. Department of Energy (DOE), U.S. Environmental Protection Agency (EPA), and the Colorado Department of Health (CDH) on January 22, 1991. The draft proposed Phase I IM/IRA Decision Document shall be prepared in accordance with paragraphs 15 and 150 of the RFP IAG, and consistent with guidance for implementing interim actions under remedial authority provided in the preamble to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) 55FR 8704, March 8, 1990 and the Colorado Hazardous Waste Act (CHWA) Closure requirements. The draft proposed Phase I IM/IRA Decision Document shall provide the information required to recommend an alternative consistent with the CDH closure regulations.

The draft Phase I IM/IRA Decision Document shall address all hazardous substance source areas with risk levels greater than $10E-6$ evaluated at the source. The IM/IRA DD and/or OU7 Baseline Risk Assessment (BRA) shall define the source areas exhibiting a risk level of $10E-6$. The proposed IM/IRA Decision Document shall be a concise document that: (1) indicates the objectives of the IM/IRA (Remediation of source and soils); (2) discusses alternatives, if any, that were considered; (3) provides the rationale for the alternative selected; (4) presents EPA/CDH approved Applicable, Relevant and Appropriate Requirement (ARAR) and; (5) discusses how the interim remedy selected will be consistent with the final remedy.

The subcontractor shall be required to incorporate all EG&G, DOE, EPA, and CDH comments into the draft final proposed IM/IRA Decision Document and generate a comment responsiveness summary.

4.7.1 Regulatory Support

The subcontractor shall be required to provide regulatory support relative to the IM/IRA process. In general, an emphasis shall be placed on RCRA, CERCLA, Land Disposal Regulations (LDRs), CHWA and DOE Orders. Regulatory analysis shall be required for all options evaluated.

4.7.2 Action Specific Applicable Relevant and Appropriate Requirements (ARARs) Development

The subcontractor shall be required to prepare an EPA approved ARAR analysis in

12

support of the IM/IRA Decision Document in accordance with the IAG. The ARARs developed shall augment the agency approved location and chemical specific ARARs and shall also require agency approval.

4.7.3 Modeling Support

The subcontractor shall be required to provide, as appropriate numerical or analytical modeling support. For example, in the event a migration barrier is selected for the preferred alternative, the subcontractor shall be required to apply the EPA approved, "Hydrologic Evaluation Landfill Performance" (HELP) model, or a comparable/equivalent model.

4.7.4 Conceptual Design

The subcontractor shall be required to prepare a conceptual design in support of the preferred alternative selected in the IM/IRA Decision Document. The conceptual design shall be sufficient for supporting the Title I Design.

4.7.5 Data Evaluation

The subcontractor shall be required to evaluate all historical and Phase I data for OU 7, new data collected, and any other existing data applicable to supporting the IM/IRA process. At a minimum, the subcontractor shall be required to utilize the OU7 Phase I RFI/RI, historical, pond characterization, and relevant OU 6 data or other previous investigations data to evaluate/select a remedial technology for closure of the Present Landfill.

4.7.6 Environmental Assessment (EA)

The subcontractor shall perform a National Environmental Policy Act (NEPA), Environmental Assessment (EA) that shall be integrated into the IM/IRA Decision Document. Guidance for performing the EA shall be taken from the integration of NEPA, CERCLA, and RCRA for activities under the Interagency Agreement at Rocky Flats Plant".

4.7.7 Options Analysis

The subcontractor shall be required to support an "Options Analysis" for landfill and pond closure. The options analysis shall take all potentially appropriate remedial alternatives into consideration. The options analysis shall support the IM/IRA Decision Document, as appropriate. Options analysis shall take into account CHWA closure requirements and EPA guidance on "presumptive remedies".

4.7.8 Prepare Draft IM/IRA Decision Document

The subcontractor shall integrate the above sections into a draft IM/IRA Decision Document in accordance with Section I.B.10 of Attachment 2 of the IAG. This document shall incorporate all new guidance approved by EPA/CDH/DOE/EG&G as a result of re-

scoping negotiations. This section shall include a conceptual design (Title I) for closure of OU 7. Draft and final versions will be required.

4.7.9 Public Comment Period Responsiveness Summary

Subsequent to the IM/IRA Decision Document being revised in accordance with the above referenced agencies comments, the CDH/EPA shall open a public comment period for the proposed IM/IRA Decision Document to satisfy the required public comment period of 60 days.

Subsequent to the public comment period for the IM/IRA Decision Document, the subcontractor shall develop a IM/IRA Responsiveness Summary in accordance with the RFP IAG and EG&G, DOE, EPA, and CDH. After receipt of EG&G, DOE, EPA, CDH and the public comment concerning the proposed IM/IRA Decision Document, the subcontractor shall submit a Final IM/IRA Decision Document and Responsiveness Summary for EG&G, DOE, EPA and CDH review and approval in accordance with paragraph 150 of the RFP IAG.

The subcontractor shall be required to support the public comment period associated with the IM/IRA Decision Document. This shall include, but may not be limited to, development of slides/overheads, attending public meetings and addressing questions, preparing narrative description of the selected remedy, etc. In addition, the subcontractor shall be required to prepare a "IM/IRA Decision Document Public Responsiveness Summary" in accordance with the RFP IAG. The responsiveness summary shall become an integrated component of the IM/IRA Decision Document. Draft and final versions will be required.

4.7.10 IM/IRA Decision Document Comment Resolution/Revision

The subcontractor shall be required to revise the IM/IRA Decision Document in accordance with the comments submitted from EG&G, DOE, EPA, CDH and public comments for incorporation into the IM/IRA decision document.

4.7.11 Development of IM/IRA Decision Document

Further development and necessary revisions of the IM/IRA Decision Document shall be required by the subcontractor in accordance with previous comments and revisions. This task will develop the final IM/IRA decision document for submittal to EG&G.

Task 4.8 IM/IRA Remedial Design

The subcontractor shall be required to prepare an IM Implementation Document in accordance with the RFP IAG. In general, the IM Design Work Plan shall consist of "Title I Design" with Title II schedule. The IM Design Work Plan shall be developed based on the conceptual design criteria from the OU7 IM/IRA Decision Document. The IM Design Work Plan shall be developed in accordance with Section I.B.10 of Attachment 2 to the IAG.

4.8.1 IM/IRA Design Work Plan

The subcontractor shall prepare an IM/IRA Design Work /plan which shall include Title II design schedules. The work plan shall be similar in nature to the Phase I RFI/RI Work Plan Implementation Plan and shall detail implementation of the selected IM/IRA.

4.8.2 Phase I IM/IRA Implementation Document (Title II Design)

The subcontractor shall be required to develop a Phase I IM/IRA Implementation Document (Title II) in accordance with the RFP IAG. The Phase I IM/IRA Implementation Document/Title II Design shall reflect appropriate percent complete (85% - 95%). The Title II Design Document shall be prepared by a registered engineer. Draft and final versions will be required.

4.8.3 Final Title II Design with Construction Schedule

The subcontractor shall be required to revise the Phase I IM/IRA Implementation Document/Title II Design in accordance with EG&G, DOE, and EPA/CDH comments and prepare a construction schedule. This document shall be prepared in accordance with the RFP IAG. The Final Title II Design Document shall reflect appropriate percent completion (95%). The construction schedule shall be developed in accordance with the IAG schedule. Draft and final versions will be required.

5.0 Deliverables

All deliverables shall be submitted with 20 copies unless otherwise specified. All deliverables shall be submitted in accordance with Table 6 of the IAG, if applicable. In order to complete DOE/EG&G internal review all draft documents shall be submitted 60 days prior to Table 6 requirements for the following:

- IM/IRA Proposed Decision Document (Draft and final)
- IM/IRA Work Plan (Draft and final)
- Final IM/IRA Proposed Decision Document (Draft and final)
- IM/IRA Responsiveness Summary (Draft and final)

Also included are those documents which fall under Task 4.6 Leachate Collection IM/IRA:

- Landfill Leachate IM/IRA Document (Draft and Final)
- Landfill Leachate IM/IRA Responsiveness Summary (Draft and Final)

In order to comply with the DOE DEAR Regulation 970.5204-19, document copies submitted to EG&G should not exceed 25,000 pages per deliverable. Should this exceed the 25,000 page limit, this will be considered an unallowable cost and will not be performed by the subcontractor.

For Task 4.1-Finalize OU 7 Phase I RFI/RI Work Plan, 7 copies of the draft and 1 copy of the

final should be submitted to the Contract Technical Representative(CTR) for printing by EG&G and so that the 25,000 page limit is not exceeded. The remainder of the copies necessary will be printed by EG&G.

Assume all Table 6 documents shall undergo one DOE/EG&G review and two CDH/EPA reviews. Responsiveness summaries for all comments shall be submitted to EG&G 15 working days after receipt of comments. Responsiveness summaries shall be submitted in lieu of revised drafts to DOE and CDH/EPA.

Additional documents required are:

Final Agency approved Technical Memorandum, Revised Field Sampling Plan For OU 7, Present Landfill. Due: 28-June-94

The subcontractor shall submit with the proposal a detailed schedule detailing all deliverables including draft and final versions, broken down to the task level as detailed in the attached work breakdown structure.

6.0 QUALITY ASSURANCE REQUIREMENTS

Work performed under this SOW is governed by the EG&G Environmental Restoration(ER) Quality Assurance Project Plan (QAPjP). The ER QAPjP complies with the requirements of EPA QAMS-005/80 and DOE Order 5700.6C which addresses ASME NQA-1.

The subcontractor shall perform all work in accordance with EG&G Quality Assurance program requirements. All work shall be performed under the cognizance of the responsible EG&G organization and in accordance with approved EG&G implementing procedures, or subcontractor procedures which have been approved by the responsible EG&G organization prior to the start of any work. The responsible EG&G organization shall review and approval all work in accordance with applicable implementing procedures.

The subcontractor shall comply with the following specific Quality Assurance (QA) requirements prior to the initiation of work, as appropriate:

6.1 Quality Assurance Addendum Revision

After review of the draft work plan revision, EG&G ER shall revise the OU 7 Phase I Quality Assurance Addendum that shall be submitted as part of the final work plan.

6.2 Organization

The authority and responsibilities of persons or organizations performing work under this statement of work shall be established, documented and submitted to EG&G ER. An organization chart identifying specific individuals by name, supported by itemized authorities and responsibilities is a suitable means of documentation.

6.3 Personnel Qualification

16

Personnel performing technical work shall receive training and indoctrination in accordance with 3-21000-ADM-2.02 to applicable procedures to assure proper understanding of the QA and technical requirements of this SOW before beginning work. In addition, written personnel qualification requirements shall be established for all positions performing technical work. Documented evidence of personnel training, training material content, personnel qualification requirements, and the qualification of personnel who meet the personnel qualification requirements shall be maintained and made available to EG&G for review upon request. EG&G will provide training for Quality Assurance and technical procedures furnished by EG&G.

Specific training shall include instruction to conform with EG&G health and safety, hazardous waste management and radiation worker requirements, as applicable.

6.4 Design

Activities involving the performance of technical design related activities, specifically, but not limited to, calculations used in developing data and calculations incorporated into reports, shall be reviewed, verified and documented. Calculations shall be performed in accordance with EG&G procedure number 3-21000-ADM-03.01.

6.5 Instructions, Procedures, and Drawings

All work shall be performed to EG&G ER approved and controlled procedures except where excluded in writing by EG&G.

6.6 Document Control

The subcontractor shall acknowledge receipt of and manage EG&G plans and procedures in accordance with EG&G procedure number 2-21000-ER-ADM-06.01.

6.7 Control of Purchased Items and Services

Items or services procured under this subcontract shall be performed in accordance with the requirements of the QAPJP.

6.8 Identification and Control of Items

When applicable, the subcontractor shall prepare written procedures that ensure that only correct and accepted items are used or installed and that they are traceable through unique identifiers. The procedures shall be submitted to EG&G for approval 10 working days after notification of the requirement.

6.9 Inspection And Assessment

Quality affecting activities are subject to inspection and assessment by EG&G. These inspections and assessments will be performed in accordance with EG&G procedure number 3-21000-ADM-10.01 and/or ADM-18.02

6.10 Control of Measuring and Test Equipment

Activities in which personnel use measuring and test equipment shall be controlled in accordance with EG&G procedure number 3-21000-ADM-12.01. Such devices shall be controlled, calibrated, and adjusted at predetermined intervals (established by the subcontractor and approved by EG&G) to maintain accuracy.

6.11 Handling, Storage, and Shipping

Activities in which personnel handle, store, package, ship, or receive items which if damaged, lost, or deteriorated would be detrimental to the work performed by the subcontractor or those activities in which personnel handle, store, package, or ship hazardous material shall be controlled by written procedures. The procedures shall be submitted to EG&G for approval 10 working days after notification of the requirement.

6.12 Control of Nonconforming Items

Activities regarding the identification and disposition of nonconforming items shall be performed in accordance with EG&G procedure number 3-21000-ADM-15.01. The control of nonconforming items shall apply to all activities that involve the handling of all items, including samples, data, raw materials, hardware, and software.

6.13 Corrective Actions

Activities that identify, rectify and preclude recurrence of conditions adverse to quality shall be conducted in accordance with EG&G procedure number 3-21000-ADM-16.01.

6.14 Software Quality Assurance

The development and use of both administrative and scientific computer software which have a potential to affect quality shall be performed in accordance with written procedures prepared by the subcontractor and submitted for approval by EG&G 10 working days after notification of the requirement.

6.15 Accessibility

The subcontractor's work place and working records shall be accessible during normal working hours for verification or audit by EG&G or their representatives, during the performance of this subcontract. All completed records shall become the property of EG&G and shall be turned over to EG&G no later than sixty (60) days following the completion of the technical work.

6.16 Miscellaneous

The subcontractor shall not be permitted to:

- Provide any safety-related items without prior inspection and acceptance by EG&G Quality Assurance organization.

- Perform any special processes such as welding, NDE, heat treatment, plating, etc., for which acceptance is based on supplier-furnished personnel qualifications or other quality assurance criteria.
- Perform inspections or tests of equipment or components for the purpose of determining final acceptance by EG&G, except for those inspections and tests conducted in accordance with approved EG&G implementing procedures or supplier procedures which have been approved by EG&G. All such inspections and tests shall be performed using measuring and test equipment verified and authorized by the Rocky Flats Metrology Lab. All work shall be performed under the direct supervision of EG&G, and witnessed by qualified EG&G personnel."

7.0 Security Requirements

None.

United States Government

Department of Energy

Rocky Flats Office

memorandum

DATE: APR 22 1994

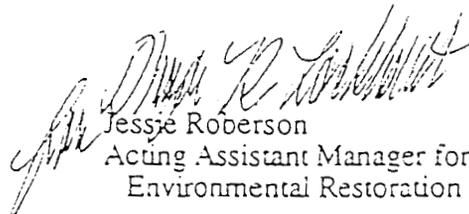
REPLY TO
ATTN OF: ER:DFG:04395

SUBJECT: Landfill Pond Leachate Collection (Operable Unit 7)

TO: Sue Stiger, Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats, Inc.

Attached is a copy of the Resolution of Dispute of the Senior Executive Committee. The resolution requires the Department of Energy to develop and implement a Surface Water Management Interim Measure/Interim Response Action (IM/IRA). As a part of this agreement, a separate IM/IRA for the collection of leachate from the Operable Unit 7 landfill pond is to be delivered to the Regulatory Agencies by October 15, 1994. In anticipation of this agreement, your staff has already provided us a preliminary cost and schedule for this work. Please refine the preliminary costs and schedules, and initiate the required changes in the applicable work packages to proceed with completion of the agreed upon IM/IRA.

Your cooperation is appreciated. Point of contact on this action is Jen Pepe at extension 2184 or Dave George at extension 5669.


Jesse Roberson
Acting Assistant Manager for
Environmental Restoration

Attachment

cc w/Attachment:
F. Lockhart, ER, RFO
J. Pepe, ER, RFO
D. George, ER, RFO
T. O'Rourke, EG&G
W. Busby, EG&G

Resolution of Senior Executive Committee
April 15, 1994

Resolution

EPA and CDH did not act arbitrarily and capriciously in requiring DOE to develop and implement a Surface Water Management IM/IRA to regulate discharges from surface water ponds, control discharges of hazardous wastes and hazardous substances into surface water ponds and require DOE to develop off-channel spill control and treatment capacity.

As part of this resolution, the Senior Executive Committee agrees to the following:

1. Nothing in this Pond Water IM/IRA shall be construed to affect any formal or informal appeal, elevation, consultation, or challenge by DOE pursuant to administrative appeal provisions in the Code of Federal Regulations or other formal or informal mechanisms, as applicable, with respect to any NPDES permit concerning discharges at Rocky Flats.
2. The parties agree that the Pond Water IM/IRA administrative controls established in Paragraphs ___ shall not become effective until the NPDES controls (established in the current NPDES permit) are no longer in effect in the new NPDES permit. The Pond Water IM/IRA administrative controls will apply to pond water management at Rocky Flats downstream of the outfalls as specified in the new NPDES permit.
3. The parties agree that extreme or prolonged precipitation events may result in water levels that threaten the integrity of the dam structures. If such climatic circumstances should occur, DOE will implement alternative water management practices, as incorporated in the Pond Water IM/IRA, to maintain the safety and security of the dam structures. When a situation arises that requires DOE to take action, DOE will notify CDH and EPA prior to taking any action.
4. The alternative water management practices established by the parties shall be incorporated into the Pond Water IM/IRA. The parties agree to specify within the Pond Water IM/IRA when alternative water management practices (e.g. controlled volume releases) will be used, what those water management practices (e.g. controlled volume releases) will be, and how and when EPA and CDH will be notified of the implementation of the alternative water management practices. In addition, the parties agree to specify within the Pond Water IM/IRA a protocol to characterize, pursuant to RCRA and CERCLA, and, if necessary, to remediate releases into the environment resulting from the use of alternative water management practices.

5. The parties agree such alternative water management practices incorporated within the Pond Water IM/IRA are consistent with and in compliance with the IAG and other environmental regulatory requirements.
6. All parties reserve any and all rights and defenses they may have under the IAG including, but not limited to, pursuing additional CERCLA or RCRA actions.

In addition the Senior Executive Committee, agrees that:

- a. The IM/IRAs for leachate collection and the Pond Water IM/IRA shall be submitted to EPA and CDH within six months;
- b. DOE will develop and propose an IAG milestone for spill control within three months;
- c. Penalties associated with this dispute are hereby waived; and
- d. It is the intent of the Parties that best efforts will be made to release the Pond Water IM/IRA for public comment concurrent with public comment of the draft NPDES permit.



Jack W. McGraw, EPA

4/15/94
Date



Thomas P. Looby, CDH

4/15/94
Date



Mark N. Silverman, DOE

4/15/94
Date

ATTACHMENT 3
 OU 7 LEACHATE AND POND WATER IM/IRA DECISION DOCUMENT
 ESTIMATED ADDITIONAL COSTS

<u>TASK</u>	<u>ADDITIONAL HOURS</u>	<u>ADDITIONAL COST</u>
ARARS	20	\$1400
DATA EVALUATION	80	\$5000
MODELING	120	\$7500
OPTIONS ANALYSIS	250	\$15,500
CONCEPTUAL DESIGN	500	\$32,500
ENVIRONMENTAL ASSESSMENT	280	\$20,000
DECISION DOCUMENT PREPARATION	560	\$39,000
MEETINGS(8 mtgs @ 4 hrs/mtg X 3 people X \$75/hr)		\$7,200
- preparation (8 mtgs @ 8 hrs/mtg X 75/hr)		\$3,600
- minutes (8 mtgs @ 2 hrs/mtg X 50/hr)		\$1,000
PROJECT MANAGEMENT (16 wks @ 8 hrs/wk X \$75/hr)		<u>\$9,600</u>
TOTAL SUBCONTRACTOR COSTS		\$140,000
EG&G COSTS: (Assumes 1.0 FTE for project management, design review, technical support, etc.)		\$87,000
TOTAL		\$227,000
CONTINGENCY		\$30,000
GRAND TOTAL		\$257,000

APRIL 15, 1994 THROUGH AUGUST 12, 1994

<u>S.M. STOLLER</u> <u>LABOR CATEGORY</u>	<u>Hourly</u> <u>Rate</u>	<u>Hours</u> <u>Allowed</u>	<u>Total Price</u>
Program Manager	\$94.77	41.5	\$3,932.96
Project Manager	\$75.69	385.5	\$29,178.50
Senior Engineer	\$86.87	697	\$60,548.39
Engineer I	\$67.86	1182	\$80,210.52
Engineer II	\$60.70	1100	\$66,770.00
Engineer III	\$52.16	739.5	\$38,572.32
Senior Geologist	\$67.31	597	\$40,184.07
Geologist I	\$61.82	57	\$3,523.74
Geologist II	\$45.49	909.5	\$41,373.16
Senior Biologist	\$72.47	368	\$26,668.96
Biologist II	\$44.70	557	\$24,897.90
Biologist III	\$36.35	150.5	\$5,470.68
Technician I	\$46.80	156.5	\$7,324.20
Technician II	\$31.61	245.5	\$7,760.26
Clerical	\$20.44	<u>574.7</u>	<u>\$11,746.87</u>
Labor Subtotal		7,761.2	\$448,162.50

AUGUST 13, 1994 THROUGH MARCH 29, 1996

Program Manager	\$99.51	115.5	\$11,493.41
Project Manager	\$79.47	1,049.5	\$83,403.77
Senior Engineer	\$91.21	1,196.0	\$109,087.16
Engineer I	\$71.25	1,769.0	\$126,041.25
Engineer II	\$63.74	1,562.0	\$99,561.88
Engineer III	\$54.77	1,224.5	\$67,065.87
Senior Geologist	\$70.68	1,824.0	\$128,920.32
Geologist I	\$64.91	55.0	\$3,570.05
Geologist II	\$47.76	2,988.5	\$142,730.76
Senior Biologist	\$76.09	871.0	\$66,274.39
Biologist II	\$46.94	1,347.0	\$63,228.18
Biologist III	\$38.17	385.5	\$14,714.54
Technician I	\$49.14	171.5	\$8,427.51
Technician II	\$33.19	555.0	\$18,420.45
Clerical	\$21.46	<u>1,394.5</u>	<u>\$29,925.97</u>
Labor Subtotal		16,508.5	\$972,865.49
TOTAL S.M. STOLLER LABOR		24,269.7	\$1,421,027.99

25

<u>OTHER DIRECT COSTS</u>			<u>Total Price</u>
Equipment/Supplies			\$25,882.00
Vehicles/Travel/Shipping			\$19,193.00
Computer Time			\$65,500.00
Sr Mgt Scientist (Yr. 1)	\$74.76	28	\$2,093.28
Sr Mgmt Scientist (Yr. 2 &3)	\$78.50	28	\$2,198.00
Mgmt Scientist I (Yr. 1)	\$64.17	122	\$7,828.74
Mgmt Scientist I (Yr. 2 &3)	\$67.38	120	\$8,085.60

LOWER TIER SUBCONTRACTORS

Gradient			\$79,502.00
Terra Matrix			\$210,971.20
Ogden			\$59,403.00
Merrick			\$3,056.00
Boyles Brothers			\$46,370.00
Temporary Services			<u>\$5,110.00</u>

TOTAL Other Direct Costs \$535,192.82

TOTAL AUTHORIZED PRICE \$1,956,220.81

26/24