ACM SMELTER AND REFINERY SITE
CASCADE COUNTY, MONTANA
REMEDIAL INVESTIGATION/FEASIBILITY STUDY SUPPORT
REMEDIAL INVESTIGATION/FEASIBILITY
STUDY STATEMENT OF WORK
OPERABLE UNIT 1 – BLACK EAGLE COMMUNITY SOILS

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Date:	**August 8, 2011**

U.S. EPA Contract No. EP-W-06-006

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STATEMENT OF WORK
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
OPERABLE UNIT 1 – BLACK EAGLE COMMUNITY SOILS

1. INTRODUCTION

The purpose of the remedial investigation/feasibility study (RI/FS) for Operable Unit 1 (OU1) of the ACM Smelter and Refinery Site (the Site) is to investigate the nature and extent of contamination in the residential and other soils within and near the community of Black Eagle, Montana, and other areas surrounding the former smelter facility property, to assess human health risks and to develop and evaluate potential remedial alternatives for OU1. Assessment of ecological risks for the Site will be deferred to the future RI/FS for the former smelter and refinery property and the Missouri River.

This Statement of Work (SOW) is "Appendix A" to and incorporated as part of the Administrative Settlement Agreement and Order on Consent for Operable Unit 1 Remedial Investigation/Feasibility Study (Administrative Order) between EPA and Atlantic Richfield Company and ARCO Environmental Remediation, LLC (Respondents).

EPA has established the initial study area boundaries of OU1 for the purpose of planning and developing the preliminary scope of the Remedial Investigation/Feasibility Study (RI/FS). The initial study area is the area defined as the "Community Soils Areas of Interest (CSAOI), the "Railroad Beds" and the "Outlying Areas" in Figure 2 of the ACM Refinery and Smelter Site Draft Conceptual Site Model [sic.], prepared by Pacific Western Technologies, and submitted to EPA on March 30, 2011 (Figure 2 is the base map used to prepare "Appendix B" to the Administrative Order.) OU1 sampling under the Administrative Order and this SOW will initially focus on the Southern CSAOI as well as developed residential yards in the northern CSAOI. A separate RI sampling plan under this Administrative Order will be developed to regionally characterize the commercial, industrial, recreational and undeveloped land areas of the northern CSAOI and the Outlying Areas.

The former railroad right-of-way and adjacent lands comprising the Railroad Beds area shown on Appendix B to the Administrative Order may be retained by EPA as part of OU1. However, response actions for the Railroad Beds are not within the definition of Work that EPA may require Respondents to fund or perform under the Administrative Order. The Railroad Beds area will be the topic of separate investigations.

2. PURPOSE OF THE STATEMENT OF WORK

This SOW sets forth requirements for conducting an RI/FS for OU1. The Respondents shall conduct the RI/FS in accordance with this SOW and the requirements in the Administrative Order and consistent with the National Contingency Plan (40 CFR Part 300) and "Guidance for

Conducting Remedial Investigations and Feasibility Studies Under CERCLA" (OSWER Directive 9355.3-01, October 1988) and any other guidance documents that EPA identifies as relevant to any aspect of conducting an RI/FS. A list of the primary guidance documents is included as Attachment A to this SOW.

EPA will establish and maintain the official project database. EPA may perform data validation in addition to the validation required to be performed by the Respondent as described in the final project Sampling and Analysis Plans (SAPs). Additionally, EPA will conduct the baseline human health risk assessment component of the OU1 RI. EPA will provide copies of the draft baseline human health risk assessment report to the Respondents. Respondents shall provide written comments on this document (and any other draft documents) prepared by EPA to EPA within 30 days of document receipt. EPA will take Respondents' comments into consideration when finalizing the document. EPA, in consultation with the State of Montana acting through its Department of Environmental Quality (DEQ), will review and EPA will either approve, approve with conditions, modify, disapprove, or provide written comments on, the Respondents' SAPs and other deliverables, in accordance with the procedures and deadlines set forth in the Administrative Order. The Respondents may discuss comments with EPA and/or DEQ to determine SAP and other deliverables revisions acceptable to EPA, but such discussions shall not extend the submittal and re-submittal deadlines. All SAPs must be approved by EPA prior to implementation.

As specified in CERCLA Section 104(a)(1), as amended by SARA, EPA, in consultation with the State, will provide oversight of the Respondents' activities throughout the OU1 RI/FS. The Respondents shall support EPA's initiation and conduct of oversight activities. EPA's determinations, approvals and activities as provided for in the Administrative Order and in the SOW shall be conducted in consultation with the State as provided for in the Administrative Order, and by CERCLA, the National Contingency Plan, and applicable guidance.

Performance of the work described in this SOW by the Respondents and EPA's review and approval of documents and activities described in this SOW shall be performed in accordance with the procedures described in the Administrative Order. The Respondents shall furnish all necessary personnel, materials, and services needed or incidental to, performing the work described in this SOW, except as otherwise specified in the Administrative Order.

3. INITIAL PLANNING FOR THE REMEDIAL INVESTIGATION

EPA has prepared and/or reviewed a variety of existing reports that summarize sampling activities carried out during prior investigations of the geographic area identified as OU1. Based on these efforts, EPA anticipates multiple phases of RI/FS for OU1, including:

- scoping investigations,
- remedial investigations and baseline risk assessment,

- feasibility study development and screening of alternatives,
- possible treatability studies, and
- feasibility study detailed analysis of alternatives.

EPA will determine the number of phases necessary to complete the RI/FS and the activities included in each phase, subject to the provisions of the Administrative Order.

3.1 Assemble Existing Information

As part of a preliminary remedial investigation for OU1, the Respondents shall assemble any existing reports and data not previously provided to EPA that are relevant to the RI/FS (to be limited to any information that was NOT submitted to EPA in the Respondents' March 25, 2011 Response to EPA's Section 104(e) Request for Information) including:

- All documentation and reporting of historical operations, activities, and studies concerning the operating facility and waste areas and contaminants associated therewith,
- All documentation and reporting of historical operations, activities, and studies concerning other potential contaminant sources within or near the Areas of Interest shown on Appendix B,
- All environmental sampling and analysis plans,
- All environmental and other data, maps and photos, and
- All reports describing data summaries, data evaluations, or interpretations of data.

This shall include available data relating to the types and quantities of hazardous substances, pollutants, or contaminants in and near the CSAOI and Outlying Areas and may include past and current waste management and disposal practices at other nearby potential contaminant sources, including other smelters that operated in the area.

The Respondents shall provide the information to EPA, with a copy to DEQ, in accordance with the schedule contained in Section 11 of this SOW. Respondent shall submit environmental sampling data in an electronic format consistent with the project database structure to allow the data to be uploaded to the project database.

3.2 Conduct Field Visits

The Respondents shall provide all support necessary to allow EPA and DEQ to conduct field visits of OU1 in order to complete the project scoping phase and to assist in developing a conceptual understanding of sources and areas of contamination as well as potential exposure pathways and receptors. EPA recognizes that OU1 consists primarily of privately held property and that Respondents' ability to facilitate access will be limited by the cooperation of the land owners. The Respondents shall coordinate with EPA to determine the field visit dates, times, and scope and shall provide at least two weeks notice of an agreed date. EPA will invite DEQ and EPA may invite other interested agencies to participate in the field visits.

4. COMMUNITY RELATIONS

EPA will develop and implement community relations activities for the OU1 RI/FS project. EPA will consider Respondents' input in development of a Community Relations Plan for the Site, including OU1. The Respondents shall, as requested by EPA, assist EPA by providing information regarding the Site history, participating in public meetings, developing graphics, placing newspaper ads developed by EPA, or distributing fact sheets developed by EPA.

5. RI/FS WORK PLAN

The Respondents shall submit a draft RI/FS work plan to EPA, with a copy to DEQ, for review and EPA approval in accordance with Section X of the AOC and the schedule contained in Section 11 of this SOW. Required elements of sampling and analysis quality assurance/quality control (QA/QC) to be reflected in the RI/FS work plan are found in EPA's Requirements for Quality Assurance Project Plans (QA/R-5).

In addition, the work plan shall fully describe all work to be performed under the RI/FS and shall include:

- A discussion of background information which addresses the nature and extent of the problem, the history of regulatory and response actions for the Site, identifies a preliminary study area boundary, and presents a local regional summary of the environs surrounding the Site;
- A list of key personnel and responsibilities;
- A description of the overall technical approach;
- A general discussion of Data Quality Objectives (DQOs) including measurements of performance;
- A data management plan; and
- A schedule.

6. SITE CHARACTERIZATION

The overall objective of site characterization is to describe the nature and extent of contamination within OU1 and to describe areas of OU1 that may pose a threat to human health or the environment. The Respondents shall perform the activities described in this section including:

- Prepare and submit to EPA, with a copy to DEQ, for review and EPA approval, or comment, in consultation with DEQ, detailed SAPs which include standard operating procedures and other detailed information (e.g., identification of the Respondent's key project personnel) as requested by EPA, in consultation with DEQ;
- Implement EPA-approved SAPs and work plans;
- Document field activities;
- Perform the laboratory analysis of samples at laboratories approved by EPA and in accordance with the EPA-approved SAPs;
- Deliver laboratory data to EPA, with a copy to DEQ, in the format specified in the SAPs;

- Prepare summary reports for each phase of investigation;
- Prepare draft and final remedial investigation reports; and
- Comply with the milestone schedule included in each EPA-approved SAP.

The Respondents shall notify EPA at least 30 days in advance of field work starting for each phase of the RI and shall provide a monthly progress report, with a copy to DEQ, and participate in meetings at EPA's request. The Respondents shall notify EPA in writing upon completion of field activities for each phase of the RI.

6.1 Development and Implementation of Sampling and Analysis Plans

The Respondents will develop and submit to EPA, with a copy to DEQ, for review and EPA approval, or comment, in consultation with DEQ, pursuant to the procedures in the Administrative Order, a detailed SAP for each phase of the RI that entails sample collection and field or laboratory analysis of the collected samples. The SAPs will be prepared in accordance with Section X of the Administrative Order and the schedule contained in Section 11 of this SOW. Each SAP will be issued by the Respondents first in draft form to the EPA, with a copy to DEQ, for review. Following satisfactory revisions by the Respondents to address any EPA and/or DEQ comments, the Respondents shall fully implement a Final SAP for each phase of the RI. EPA may require the Respondents to include detailed information in the final SAP (e.g., standard operating procedures, analytical laboratory reporting limits, names and responsibilities of key project personnel, schedule). EPA will approve all final SAPs.

It is anticipated that there will be multiple phases of the RI, the number of phases required will be determined by EPA, in consultation with DEQ. The final EPA-approved SAP for each phase of the RI will include a description of the goals for the specific phase, a list of key personnel and responsibilities, Data Quality Objectives (DQOs), field sampling plans, Quality Assurance Project Plan (QAPPs), and data management plans and schedules. Each final EPA-approved SAP will describe the sampling program including the rationale, number, type, and location of samples; the sample collection, handling and custody procedures; the required field documentation and the required analytical methods. QAPP procedures will describe the measures necessary to generate data of sufficient quality to achieve the DQOs. The QAPP will specify any special training requirements and certifications, quality control requirements for field activities and analytical processes, and data validation requirements.

Respondents shall prepare a Health and Safety Plan (HSP) specific to the activities and submit it to EPA, with a copy to DEQ, in accordance with the schedule contained in Section 11 of this SOW. Respondents are solely responsible for ensuring the health and safety of their respective employees and/or contractors performing any of the work described in this SOW. The Respondents shall exercise best efforts to obtain access to properties for sampling and shall implement each final EPA-approved SAP in accordance with the schedule included in the SAP. The Respondents shall arrange for validated analytical data from laboratories to be reported to

EPA, with a copy to DEQ, in the format specified by EPA in the final EPA-approved SAP. Respondent will perform all required data validation described in the final EPA-approved SAP.

The Respondents shall consistently document and adequately record in well maintained field logs and laboratory reports, information gathered during implementation of each final EPA-approved SAP. The method(s) of documentation shall be consistent with that specified in the final EPA-approved SAP. The Respondents shall use field logs to document observations, measurements, and significant events that occur during field activities. The Respondents shall ensure that laboratory reports document sample custody, analytical responsibility, analytical results, adherence to prescribed protocols, nonconformity events, corrective measures, and/or data deficiencies.

The Respondents shall maintain field reports and sample shipment records. Analytical results developed under the SAPs shall not be included in any site characterization summary reports or RI report unless accompanied by or cross-referenced to a corresponding QA/QC report. In addition, the Respondent shall establish a data security system to safeguard field logs, field data sheets, laboratory reports, chain of custody forms and other project records to prevent loss, damage, or alteration of project documentation. The Respondents shall submit a written description of the data security system to EPA, with a copy to DEQ, for review and EPA approval in accordance with Section X of the Administrative Order and the schedule contained in Section 11 of this SOW.

6.2 Summary Reports

For each phase of the RI, the Respondents shall prepare a summary report describing the implementation of the SAP. Each summary report shall include the field documentation specified in the SAP, a description of the physical characteristics of the study area, results of all required field quality control procedures, and results of all field and laboratory audits performed by the Respondents as specified in the final EPA-approved SAP. The Respondents shall submit, for EPA review and approval, in consultation with DEQ, a summary report for each phase of sampling to EPA, with a copy to DEQ, for review in accordance with Section X of the Administrative Order and the schedule established in the final EPA-approved SAP for that phase.

6.3 RI Report

After the SAP for the final phase of the OU1 RI has been implemented, the Respondents shall prepare and submit a draft RI report to EPA, with a copy to DEQ, for review and EPA approval in accordance with Section X of the Administrative Order and the schedule contained in Section 11 of this SOW. The RI report shall summarize results of field activities, the sources of contamination, the nature and extent of contamination and the fate and transport of contaminants. The Respondents shall refer to Table 3-13 in "Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA", OSWER Directive 9355.3-01, October 1988 for a suggested RI report format with the exception that EPA will prepare the baseline human health risk assessment.

Within the RI report, the Respondents shall analyze and evaluate the data to describe the following, including but not limited to:

- Physical and biological characteristics of OU1,
- Contaminant source characteristics,
- Nature and extent of contamination, and
- Contaminant fate and transport.

The RI report will include the actual and potential magnitude of releases from the sources, and horizontal and vertical spread of contamination as well as mobility and persistence of contaminants. Where modeling is appropriate, such models shall be identified in a letter submitted to EPA, with a copy to DEQ, for review and EPA approval, in consultation with DEQ, prior to their use. All data and programming, including any proprietary programs, shall be made available to EPA. Also, this evaluation shall provide any information relevant to Site characteristics necessary for the development and evaluation of remedial alternatives.

6.4 Remedial Action Objectives

EPA, in consultation with DEQ, will develop remedial action objectives and a list of potential State and federal ARARs based on the information provided in the final EPA approved RI report and the baseline human health risk assessment and ecological risk assessment prepared by EPA.

6.5 Designation of Operable Units.

EPA reserves all rights to establish other operable unit(s) at the Site.

7. DEVELOPMENT AND SCREENING OF REMEDIAL ALTERNATIVES

The Respondent shall perform the following activities to complete the development and screening of remedial alternatives.

7.1 Develop General Response Actions

The Respondents shall develop general response actions that will satisfy the remedial action objectives developed by EPA, in consultation with DEQ, for OU1. General response actions may include treatment, containment, excavation, extraction, disposal, institutional controls, or a combination of these.

For each environmental medium for which remedial action objectives have been developed by EPA, in consultation with DEQ, the Respondent shall make an initial determination of areas or volumes to which general response actions may apply, taking into account Site conditions, the nature and extent of contamination, and acceptable exposure levels and potential exposure routes identified in the remedial action objectives.

7.2 Identify and Screen Remedial Technology Types and Process Options

The Respondents shall identify and evaluate remedial technology types and process options applicable to each general response action. The term "technology types" refers to general categories of technologies. The term "process options" refers to specific processes within each technology type. Several broad technology types may be identified for each general response action and numerous technology process options may exist within each technology type.

The Respondents shall use information from the RI on contaminant types and concentrations and Site characteristics to screen out technologies and process options that cannot be effectively implemented at the Site. The Respondent shall document the results of the initial screening of technology types and process options for OU1 in a technical memorandum. For efficiency, the technology and process option screening memo (referenced in this section) can be combined with the development and screening of alternatives tech memo (referenced in Section 7.5) and treatability studies letter (referenced in Section 8.1) into a single submittal, subject to EPA's approval. The Respondents shall refer to Figures 4-4 and 4-5 in the "Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA," OSWER Directive 9355.3-01, October 1988 for examples of figures that may be used to summarize the initial screening of technologies and process options and the evaluation of process options. The Respondents shall submit the technical memorandum that documents the tasks described in this Section 7.2 and Sections 7.5 and 8.1of this SOW to EPA, with a copy to DEQ, for review and EPA approval in accordance with Section X of the Administrative Order and in accordance with the schedule contained in Section 11 of this SOW.

7.3 Assemble and Document Alternatives

The Respondents shall assemble selected representative technologies into alternatives that represent a range of treatment and containment combinations that will address the remedial action objectives for OU1. The Respondent shall specify the reasons for eliminating alternatives during the preliminary screening process.

7.4 Alternative Screening and Selection of Alternatives for Detailed Analysis

The Respondents shall perform a screening of each remedial alternative based on effectiveness, implementability, and cost. As appropriate, the screening will preserve the range of treatment and containment alternatives that was initially developed. The range of remaining alternatives will include options that use treatment technologies and permanent solutions to the maximum extent practicable.

7.5 Development and Screening of Alternatives Technical Memorandum

The Respondents shall prepare a technical memorandum summarizing the work performed in the development and screening of alternatives and the results of each subtask described in this section including:

- A description of the general response actions and the areas or volumes of contaminated media to which they apply,
- A description of the remedial technology types and process options applicable to each general response action,
- The results of the initial screening of remedial technology types and process options,
- A description of the remedial alternatives,
- The results of the screening of alternatives based on effectiveness, implementability, and cost,
- A description of the alternatives that remain after screening and the proposed action specific State and federal ARARs for each alternative.

The Respondents shall submit the technical memorandum to EPA, with a copy to DEQ, for review and EPA approval in accordance with Section X of the Administrative Order and in accordance with the schedule contained in Section 11 of this SOW.

8. TREATABILITY STUDIES

EPA may require the Respondents to perform treatability studies to provide sufficient data to allow treatment alternatives to be fully developed and evaluated during the feasibility study and/or to reduce the cost and performance uncertainties for treatment alternatives to levels sufficient to allow EPA to select a remedy. EPA may also allow Respondents to rely on the results of treatability studies from other similar sites that were conducted under EPA oversight.

8.1 Letter Report

The Respondents shall identify a range of candidate technologies for treatability studies based on the remedial action objectives and the list of potential State and federal ARARs and taking into consideration the final results of the development and screening of alternatives. The Respondents shall describe the candidate technologies in a letter report submitted to EPA, with a copy to DEQ, for review and EPA approval in accordance with Section X of the Administrative Order and the schedule contained in Section 11 of this SOW. Within the letter report, the Respondents shall present information on performance, relative costs, removal efficiencies, operation and maintenance requirements, and implementability of the identified candidate technologies. If the existing data on the Site and the available information on candidate technologies are not sufficient to evaluate alternatives in the detailed analysis of alternatives, EPA may require treatability studies to be performed by the Respondents.

8.2 Treatability Studies Work Plan

Where EPA has determined that treatability studies are required, and unless the Respondents can demonstrate to EPA's satisfaction that they are not needed, the Respondents shall submit a draft treatability study work plan (conforming to the DQOSAP- QAPP requirements of the UFP-QAPP format) to EPA, with a copy to DEQ, for review and EPA approval in accordance with Section X of the AOC and the schedule contained in Section of 11 of this SOW. The work plan shall describe the type of treatability study to be performed (e.g., bench scale or pilot scale) and shall include:

- A discussion of background information;
- A list of key personnel and responsibilities;
- A description of the remedial technologies to be tested;
- DQOs for each test including measurements of performance;
- the experimental procedures for each test;
- A SAP which describes the samples to be collected, sample collection procedures, sampling handling and tracking procedures, a QAPP, and analytical methods;
- A data management plan;
- A health and safety plan; a plan for management of waste generated during the treatability tests; and
- A schedule.

8.3 Treatability Studies Report

Upon EPA approval of the treatability study work plan, the Respondents shall implement the work plan. Following completion of the treatability study, the Respondents shall analyze and interpret the study results in a technical report submitted to EPA, with a copy to DEQ, for review and EPA approval in accordance with Section X of the AOC and the schedule contained in the final EPA-approved treatability study work plan. In the report the Respondents shall evaluate the effectiveness, implementability, and cost of each technology and compare test results with predicted results. The Respondents shall also evaluate full-scale application of the technology including a sensitivity analysis identifying key parameters affecting full-scale operation.

9. DETAILED ANALYSIS OF ALTERNATIVES

Upon EPA approval of the Development and Screening of Alternatives Technical Memorandum, the Respondents shall perform a detailed analysis of the remaining OU1 remedial alternatives. The detailed analysis shall be sufficient to allow EPA to adequately compare the alternatives, select a remedial action for, and demonstrate satisfaction of the CERCLA statutory remedy selection requirements (§121(b)(1)(A) of the CERCLA).

The Respondents shall assess each alternative against the following seven of the nine evaluation criteria contained in the National Contingency Plan (40 CFR Part 300.430(e) (9) (iii)):

1. Overall protection of human health and the environment
2. Compliance with ARARs
3. Long term effectiveness and permanence
4. Reduction of toxicity, mobility, or volume through treatment
5. Short-term effectiveness
6. Implementability
7. Cost

The Respondents shall conduct the detailed analysis of alternatives by evaluating each alternative against the seven evaluation criteria above and then performing a comparative analysis between remedial alternatives. That is, each alternative shall be compared against the others using the evaluation criteria as a basis of comparison.

10. FEASIBILITY STUDY REPORT

The Respondents shall prepare a draft FS report that summarizes the development and screening of remedial alternatives and the detailed analysis of alternatives. Identification and selection of the preferred alternative are reserved by EPA, in consultation with the State. The Respondents shall refer to the "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA" (OSWER Directive 9355.3-01, October 1988) for an outline of the FS report and the required report content. The Respondents shall submit the draft FS report to EPA, with a copy to DEQ, for review and EPA approval in accordance with Section X of the AOC and the schedule contained in Section 11 of this SOW.

11. SCHEDULE OF DELIVERABLES

The Respondents shall deliver documents and perform activities described in this SOW in accordance with the following schedule:

SOW REFERENCE	DOCUMENT OR ACTIVITY	DELIVERY DATE
Section 3.1	Provide existing information	90 days after signing AOC and thereafter, 2 weeks after becoming aware of new information
Section 3.2	Conduct field visit	Not later than 45 days after signing AOC
Section 3.2	Notification of field visit	2 weeks prior to field visit
Section 4	Community relations support	As requested by EPA
Section 5	Draft RI/FS Work Plan	45 days after signing AOC
Section 5	Final RI/FS Work Plan	30 days after receipt of EPA comments on Draft RI/FS Work Plan
Section 6.1	Draft Sampling and Analysis Plan (SAPs) for each phase of the RI	45 days prior to the start of fieldwork
Section 6.1	Final SAP for each phase of the RI	3 weeks after receiving EPA comments on Draft SAP
Section 6.1	Health and Safety Plan	2 weeks prior to field visit
Section 6.1	Health and Safety Plan updates necessary for SAP implementation	30 days prior to start of field work

SOW REFERENCE	DOCUMENT OR ACTIVITY	DELIVERY DATE
Section 6.1	Written description of data security System	30 days prior to start of field work for Phase I SAP
Section 6.2	Summary Reports for each phase of sampling	In accordance with the schedule specified in EPA approved final SAP for that phase
Section 6.3	Draft OU1 RI Report	120 days after field work is complete for final phase of sampling
Section 6.3	Final OU1 RI Report	60 days after receiving EPA comments on draft RI Report
Section 7.2, 7.5 and 8.1	Draft Technical Memorandum documenting initial screening of technology types and process options Development and Screening of Alternatives and Treatability Studies Letter Report (if needed)	90 days after receiving final remedial action objectives from EPA
Section 7.2, 7.5 and 8.1	Final Technical Memorandum documenting initial screening of technology types and process options Development and Screening of Alternatives and Treatability Studies Letter Report (if needed)	45 days after receiving EPA comments on draft Technical Memorandum
Section 8.2	Draft Treatability Studies Work Plan (if needed)	30 days after receiving notice from EPA that treatability studies are required
Section 8.2	Final Treatability Studies Work Plan (if needed)	30 days after receiving EPA comments on draft Work Plan
Section 8.3	Draft Treatability Studies Technical Report	As specified in EPA approved final Treatability Studies Work Plan
Section 8.3	Final Treatability Studies Technical Report	30 days after receiving EPA comments on draft Technical Report
Section 10	Draft OU1 FS Report	120 days after EPA approval of final Development and Screening of Alternatives Technical Memorandum

SOW REFERENCE	DOCUMENT OR ACTIVITY	DELIVERY DATE
		or final Treatability Studies Technical Report, whichever is later
Section 10	Final OU1 FS Report	60 days after receiving EPA comments on draft FS report

ATTACHMENT A
List of Guidance Documents

EPA Requirements for Quality Assurance Project Plans (QA/R-5)

Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA. OSWER Directive 9355.3-01

Guidance for Data Usability in Risk Assessment, (OSWER Directive #9285.7-05, October 1990), or subsequently issued guidance.

Uniform Federal Policy for Implementing Quality Systems, EPA-505-F-03-001, March 2005), or subsequently issued guidance.

A Guide to Developing and Documenting Cost Estimates during the Feasibility Study. EPA 540-R-D0-002, OSWER No. 9355.0-75

CERCLA Compliance with Other Laws Manual. Part I. Interim Final
EPA 540/G - 89/006, OSWER No. 9234.1-01

CERCLA Compliance with Other Laws Manual: CERCLA Compliance with the CWA and SDWA. OSWER No. 9234.2-06/FS