STATEMENT OF WORK FOR
Columbia Falls Aluminum Plant, a/k/a Anaconda Aluminum Co. Columbia Falls Reduction Plant Superfund Site, Columbia Falls, MT
Remedial Investigation/Feasibility Study Oversight
October 12, 2016

Contract:	**Region 8 Response Action Contract**
Contract Number/Contractor:	**EP-W-05-049/CDM-Smith - Federal Programs**
Work Assignment Number:	**#359-RSBD-A882**
Scope:	**Columbia Falls Aluminum Plant**
Revision Number:	**0**
EPA Contracting Officer:	**Evelyn Stanley, CO** stanley.evelyn@epa.gov **(202/564-2557)**
EPA Project Officer :	**Jodi Powell, PO** powell.jodi@epa.gov **(303/312-6715)**
EPA Technical Contact:	**Mike Ciran, COR** cirian.mike@epa.gov **(406/293-6194)**
Period of Performance:	**Award to September 27, 2017**

Introduction

SITE DESCRIPTION

The facility is located at 2000 Aluminum Drive near Columbia Falls, Flathead County, Montana. The Site is approximately 2 miles northeast from the center of Columbia Falls.
The total property owned by CFAC is approximately 3,196 acres. However, the footprint of operations and a perimeter buffer zone consists of approximately 1,340 acres bounded by Cedar Creek Reservoir to the north, Teakettle Mountain to the east, Flathead River to the south, and Cedar Creek to the west. The non-industrial areas of the Site have been previously used for recreational purposes such as hunting and fishing. The remainder of the CFAC owned property is located south of Flathead River and was never used for industrial operations.
Buildings and industrial facilities located at the Site currently include offices, warehouses, laboratories, mechanical shops, paste plant, coal tar pitch tanks, pump houses, casting garage, and the potline facility. The Site also includes seven closed landfills, one active landfill, material loading and unloading areas, two closed leachate ponds, and several wastewater percolation ponds. A rectifier yard and switchyard owned by Bonneville Power Administration and a right-of-way for the Burlington Northern Railroad are also within the Site boundaries.
The nearest residences are located adjacent to the southwest Site boundary, approximately 0.80 miles west of historic footprint of Site operations, in a neighborhood referred to as Aluminum City.

According to available resources, the earliest noted developments at the Site were agricultural and residential. Industrial development began in the 1950s, when the Anaconda Copper Mining

Company purchased the property in 1951 and built the existing aluminum reduction facility. The industrial ownership timeline for the Site is as follows:
1951 to 1978: Anaconda Aluminum Company
1978 to 1985: Atlantic Richfield Company
1985 to 1999: Montana Aluminum Investor's Corporation
1999 to present: Columbia Falls Aluminum Company, LLC

PURPOSE

The purpose of this work assignment is to conduct oversight of the potentially responsible parties (PRPs) remedial investigation/feasibility study (RI/FS) at Columbia Falls Aluminum Plant to select a remedy to eliminate, reduce, or control risks to human health and the environment. Specifically, the RI/FS oversight involves the investigation and study of Groundwater, surface water, soils and formally used landfills. This statement of work (SOW) sets forth the framework and requirements for this effort. The goal is to develop data necessary to support the selection of an approach for site remediation and then to use this data to result in a well-supported Record of Decision (ROD). The estimated completion date for this work assignment is 9/27/16.

GENERAL REQUIREMENTS

This is a term-form work assignment that requires the contractor to provide oversight of the RI/FS as specified in the settlement agreement issued on November 30, 2015. Successful RI/FS oversight is accomplished by observing and documenting that the PRP has or has not complied with all applicable laws, regulations, and requirements, and has or has not met all performance standards specified in the settlement agreement. Furnish all necessary and appropriate personnel, materials, and services needed for, or incidental to, performing the oversight of the RI/FS in accordance with this SOW.

In conducting the work assignment, EPA expects the contractor to propose the most appropriate and cost-effective procedures and methodologies using accepted engineering practices and controls. Throughout the performance of this work assignment/task order, EPA expects the contractor to be responsible for performing services and providing products at the lowest reasonable cost. If the contractor fails to meet the requirements within the negotiated costs, the government may elect to provide the contractor with additional funds to complete the work assignment without providing any additional fee. If there are changes to the SOW by the government, the government will issue a formal amendment to the SOW and negotiate the cost of the amendment with the contractor to form a new cost estimate.

A summary of the potential major deliverables and proposed schedule for submittals is in Attachment 1. This summary and schedule can be used as the basis for the contractor's proposed deliverables and schedules included in the work plan.

Communicate at least weekly with the Work Assignment Manager (WAM)/Contracting Officer Representative (COR), either in face-to-face meetings or through conference calls. Document all decisions that are made in meetings and conversations with EPA. Forward this documentation to the WAM/COR within five working days of the meeting or conversation.

EPA will provide oversight of contractor activities throughout the RI/FS oversight. EPA review and approval of deliverables is a tool to assist this process and to satisfy, in part, EPA's responsibility to provide effective protection of public health, welfare, and the environment. EPA will review deliverables to assess the likelihood that the RI/FS will achieve its goals and that its performance and operations requirements have been met. Acceptance of deliverables by EPA does not relieve the RI/FS oversight contractor from responsibility for the adequacy of their deliverables or their professional responsibilities.

All travel shall be charged in accordance with the regulations set forth under FAR 31.205-46.

TECHNICAL DIRECTION

Technical Direction is for clarification purposes only and not changing the scope of the tasks outlined in this SOW. Note that a significant change in this SOW requires a modification that must be approved by the contracting officer via work assignment amendment. Per clause H-23 of the RAC 2 Region 8 contract, Technical Direction, the WAM and the Project Officer are authorized to provide technical direction under this work assignment. Technical Direction will be provided in writing within five (5) calendar days after verbal issuance. The contracting officer is the only person with the authorization to make changes to the SOW. Any changes must be approved by the CO in writing via a work assignment amendment. Technical directive is used only to clarify the statement of work.

GOVERNMENT PROPERTY

FAR 45.302-1 requires contractors to furnish all facilities required for performing Government contracts. The Government will reimburse reasonable and allocable costs for contractor's use of their property under this contract. The three primary methods of doing so are through payment of appropriate depreciation charges, usage charges and reimbursement of rental costs.

EPAAR 1552.245-73 states that the contractor shall not fabricate or acquire, on behalf of the Government, either directly or indirectly, through a subcontract, any item of property without written authorization from the Contracting Officer. Requests for such authorization shall be submitted to the Contracting Officer and shall include a statement that the item is required for contract performance and that the request is based on one of the following conditions:

1) Meets one of the exceptions outlined in FAR 45.302-1(a)(1-5);
2) Qualifies under the terms of EPA's class deviation;
3) Provides the basis for an individual FAR deviation; or
4) For material, meets the exceptions at FAR 45.303-1.

The contracting officer will either authorize or reject the request.

RECORD KEEPING REQUIREMENTS

Maintain all technical and financial records for the RI/FS oversight in accordance with the contract. At the completion of the work assignment/task order, submit an official record of the RI/FS oversight in both compact disk and a hardcopy to the WAM/COR. Provide the deliverables using electronic media.

USEPA PRIMARY CONTACTS

The primary contact for this work assignment is Mike Cirian. He can be reached at (406)293-6194, via facsimile at (406)293-5668, or via e-mail at cirian.mike@epa.gov. His mailing address is US EPA Information Center, 108 East 9th St., Libby, MT 59923. The secondary contact is Roger Hoogerheide. He can be reached at (406)457-5031, or via e-mail at hoogerheide.roger@epa.gov. His mailing address is US EPA Region 8MO, 10 West 15 Street, Helena, MT 59626.

WA COMPLETION DATE AND PROJECT CLOSEOUT

At the completion of the work assignment, perform all necessary project closeout activities as specified in the contract. These activities include closing out any subcontracts, indexing and consolidating project records and files as required above, and providing a technical and financial closeout report to EPA. The goal is to complete all technical activities and closeout activities for this work assignment by 09/27/2017.

RI/FS Oversight Work Planning

TASK 1 WORK PLAN

Prepare and submit a RI/FS oversight work plan that includes a detailed description of implementation activities, performance monitoring, and overall management strategy, including optimization, for the RI/FS oversight.

- Contacting the WAM/COR within five calendar days after receipt of the work assignment to schedule the scoping call within 5 days of receipt of this work assignment. Regional personnel will be available to meet with the contractor 5 calendar days after the initial scoping meeting to discuss and clarify any issues the contractor may have regarding this project. Contact the WAM/COR to schedule this meeting at least five working days before the proposed meeting date.

- Preparing and submitting a draft RI/FS oversight work plan within 30 calendar days after the scoping meeting. The work plan shall include a detailed description of the technical approach for the RI/FS oversight activities in accordance with the WAF. Specify the necessary procedures, inspections, deliverables, and schedules. Include a comprehensive implementation management schedule for completion of each major activity and submittal.

- Preparing the estimated cost to complete the work assignment, including subcontractor costs, for each element of the SOW; providing a breakdown of the cost by task and subtask levels, in accordance with the contract work breakdown structure (WBS).

- Negotiating and preparing a revised work plan, if the contractor fails to meet the Region's minimum standards.

- Overall contract management

- Providing conflict of interest disclosure.

SITE-SPECIFIC PLANS

Review all existing site-specific plans prepared by the PRPs. Prepare, update, and/or maintain plans, as necessary, for RI/FS oversight implementation in accordance with applicable guidance. Incorporate the plans and procedures received from any subcontractor(s) into the overall site plans. Should the contractor fail to meet the required standards in accordance with the appropriate legal, regulatory, and EPA guidance, prepare revised site-specific plans.

X Quality Assurance Project Plan (QAPP)/Sampling and Analysis Plan (SAP) Development. A QAPP/SAP and crosswalk are required. The QAPP/SAP needs to comply with the CDM-Smith QMP June 3, 2013 and Annual Updates. The QAPP/SAP needs to include all environmental data activities (including environmental technology, if applicable) as outlined in Tasks 2, 3, 4, 5 and 6. The QAPP/SAP shall include the four (4) major elements (project management, data generation/acquisition, assessment and oversight, data validation and usability). The QAPP/SAP and QA Document Review Crosswalk (https://www.epa.gov/quality/managing-quality-environmental-data-epa-region-8) needs to be submitted and approved before work can begin.

X Field Sampling Plan (FSP) in accordance with 40 CFR 300.415(b)(4)(ii).

- Site-specific Health and Safety Plan (HSP) that specifies employee training, protective equipment, medical surveillance requirements, standard operating procedures, and a contingency plan in accordance with 29 CFR 1910.120(l)(1) and (l)(2). NOTE: The PRP HSP may be modified for use if appropriate.

PROJECT INITIATION

Perform project initiation and support that will lead to the selection of a remedy that eliminates, reduces, or controls risks to human health and the environment.

- Reviewing qualifications of the PRP's laboratory for the given analytical requirements.

- Procuring, managing, and providing oversight of pool and team subcontracts for analytical services.

- Reviewing background documents when directed by EPA.
- Reviewing PRP Work Plan.
- Preparing Technical Memorandum and schedule for interface of Risk Assessment activities. Addressing data transfer from PRP; schedule contingencies.

PROJECT MANAGEMENT

Perform activities required to effectively manage the work assignment.

- Monitoring costs and progress.
- Preparing and submitting monthly progress reports that document monthly and cumulative cost, performance status, and technical progress.
- Preparing and submitting monthly invoices for the specified period of performance in accordance with the level of detail as specified in the contract.
- Manage, track, and report status of site-specific equipment.
- Participating in meetings and preparing and submitting meeting summaries.
- Accommodating any external audit or review mechanism that EPA requires.
- Evaluating existing data, including usability, when directed by EPA.
- Overall Contract Management.
- Reviewing background documents as directed by EPA.

TASK 2 COMMUNITY INVOLVEMENT

Provide support for community involvement and the preparation and implementation of the Community Involvement Plan (CIP) for the site. Perform community involvement activities in support of EPA throughout the RI/FS oversight in accordance with the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP, 40 CFR Part 300) and the *Community Relations in Superfund - A Handbook*, (U.S. EPA, Office of Emergency and Remedial Response, OSWER Directive No. 9230.0-3C, January 1992). **Community Involvement may incorporate items listed below. Incorporate 3 site visits per year.**

- Conducting community interviews.
- Developing Community Involvement Plan (CIP).

- Providing public meeting and/or open house support.
- Preparing fact sheets, notices and other informational documents.
- Providing support for proposed plan.
- Providing public hearing support.
- Publishing public notices in local newspapers serving the site community.
- Maintaining public information repository.
- Developing and updating site mailing lists.
- Providing administrative and technical support for Responsiveness Summary.
- Preparing presentation materials.
- Implementing other community involvement activities as identified by the site-specific CIP or EPA.
- Providing technical support to review Community Involvement deliverables and participate in public meetings.
- Ensure and document that all distributed information at public meetings, mailings, distribution to the press, etc. are information (environmental data and/or measurement) that meet/have met EPA's requirements for quality assurance.
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TASK 3 FIELD INVESTIGATION/DATA ACQUISITION

Provide technical field oversight for the purpose of documenting PRP performance of field work. Maintain and provide to EPA a logbook documenting field oversight.

- Oversight and documentation of PRP field activities following Standard Operating Procedures (SOPs) identified in an approved contractor QAPP.
- Collection of split samples.
- Performance of sampling/screening/testing/assessment.
- Preparation of technical oversight reports. For cost estimation purposes, it is anticipated that the contractor shall provide monthly technical oversight reports that includes all logbook entries and

TASK 4 SAMPLE ANALYSIS

Analyze split samples taken to document and confirm PRP sampling results and performance. A variety of mechanisms may be used to implement this task including: field screening using mobile facilities or field portable equipment, the Contract Laboratory Program (CLP), Region 8 Environmental Services Assistance Team (ESAT) Laboratory, or regionally procured laboratories. [NOTE: This task consists exclusively of performing sample analyses and producing analytical data. For cost estimating purposes, there should be no direct labor costs under this task - no hours should be reflected under this task, only dollars.]

TASK 5 ANALYTICAL SUPPORT AND DATA VALIDATION

Coordinate with PRP to track, and oversee sample analyses and validate analytical data.

- Coordinate split sampling with PRP, of environmental samples in accordance with approved SOPS identified the Field Sampling Plan (FSP). The following types of sampling shall be required:
  - Field screening
  - Ground water sampling
  - Surface and subsurface soil sampling
  - Surface water and sediment sampling
  - Air monitoring and sampling
  - Other types of media sampling and screening
- Requesting, obtaining, and performing oversight of analytical services in compliance with EPA requirements.

- Arrange sample analyses with Don Goodrich who is the EPA Regional Superfund analytical coordinator. An Analytical Service Request (ASR) spreadsheet should be provided to Don Goodrich detailing the analytical and project requirements. This spreadsheet should be provided at least two weeks before the sampling event.

- Providing sample management including chain of custody procedures, information management, sample retention, and 10-year data storage.

- Performing data validation, the process by which the quality of the data, the defensibility of the data, and the chain of custody are verified. Performing data validation in accordance with Regional guidelines.

- Reviewing data for usability for its intended purpose.

- Providing reports on data validation and usability.

TASK 6 DATA EVALUATION

Compile split sampling data and determine usability of all data collected. Prepare and submit a report summarizing split sample results. Include in the report a discussion of analytical

results, a comparison of PRP sampling data with the split samples analyzed by EPA, and a discussion of any discrepancies.

- Uploading all historical data collected at the site as well as split sample data collection collected during the work-plan period of performance into EPA's SCRIBE database

TASKS 7-14 CONTRACTOR WILL NOT PERFORM ANY ACTIVITIES UNDER THESE TASKS.

TASK 15 CLOSE-OUT:

15.1 The Contracting Officer will notify contractor though a WAF that the activities required for this work assignment are complete. Following notification, the contractor shall provide an estimate of final costs to the Project Officer. Estimate should include the following: amount of funding allocated to the work assignment, approved budget, all costs that have been incurred as of date, all costs incurred but not invoiced, anticipated costs to close-out work assignment such as copying and other anticipated costs, final total costs of work assignment as projected by contractor. The Project Officer, following review and determination as acceptable, will then forward a work assignment amendment to the Contracting Officer. The Contracting Officer will then, via issuance of a work assignment amendment, notify the contractor to continue with closeout activities.

15.2 The contractor shall provide an index of all documents/deliverable relating to the work assignment to the WAM (Project Officer) for a duplication check. Following a review of the index the WAM (PO) will notify the contractor if any items need to be duplicated and forwarded to the WAM. All deliverables are to be sent both hard copy and electronically in the format requested by the WAM (i.e., PDF). Contractor is to return any documents back to EPA or other document repositories if applicable. The contractor shall proceed with administrative activities as defined in the contract for file retention, which include file archiving to meet Federal Records Center requirements, distribution and storage.

15.3 The contractor shall prepare and submit an accounting of costs and LOE by subtask and compare it to the projected budget, to be provided with the final invoice submission for review by the Project Officer.

Attachment 1 - Summary of Major Submittals for the RI/FS Oversight at the Columbia Falls Aluminum Plant

DELIVERABLE	NO. OF COPIES	DUE DATE (calendar days)
RI/FS Oversight Work Plan	3	30 days after initiation of work assignment (WA)
Monthly Progress Reports	3	Monthly and as required in the contract
Site Management Plan (SMP)	3	NA
Health and Safety Plan (HASP)	3	28 days after approval of RI/FS oversight work plan
Quality Assurance Project Plan QAPP/Sampling & Analysis Plan (SAP)	3	28 days after approval of RI/FS oversight work plan
QAPP/SAP and Crosswalk - Submittal Approval		Must be approve prior to any environmental data activity (Tasks 2, 3, 4,5 & 6)
Field Sampling Plan (FSP)	3	28 days prior to sampling events.
Comments on PRP's Health and Safety Plan	3	[14] days after receipt of PRP's document
Comments on PRP's Quality Assurance Project Plan and revisions	3	[14] days after receipt of PRP's document
Comments on PRP's Field Sampling Plan	3	[14] days after receipt of PRP's document
Fact Sheets	3	As needed
Public Meeting Support Materials	TBD	One week prior to scheduled meeting
Field Reports	3	3 days after every (time period, i.e., week) of field activities
Field Investigation Summary Report	3	[14] days after receipt of the end of all field investigations
Data Evaluation Report	3	[30] days after receipt of analytical results from laboratory
Comments on PRP's Human Health Risk Assessment Report	3	[21] days after receipt of PRP's document
Comments on PRP's Ecological	3	[21] days after receipt of PRP's

DELIVERABLE	NO. OF COPIES	DUE DATE (calendar days)
Risk Assessment Report		document
Comments on PRP's Treatability Study Work Plan	3	[21] days after receipt of PRP's document
Field Oversight Reports	3	[5] days after each 2 week period
Work Assignment Closeout Report	3	30 days after final RI/FS report submitted
Final Costs	3	90 days after work assignment closeout.