EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 4-02

☐ Other ☐ Amendment Number:

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-W-10-016	08/09/2010 To 07/31/2017 Base Option Period Number 4	NPL Responses to Comments

Contractor: CSC GOVERNMENT SOLUTIONS LLC

Specify Section and paragraph of Contract SOW: Task 2

Purpose:
- [X] Work Assignment
- [ ] Work Assignment Amendment
- [ ] Work Plan Approval
- [ ] Work Assignment Close-Out
- [ ] Incremental Funding

Period of Performance: From 08/01/2016 To 07/31/2017

Comments:
Award Term 2

[X] Superfund — Accounting and Appropriations Data — [ ] Non-Superfund

Note: To report additional accounting and appropriations date use EPA Form 1900-69A.

SFO (*Max 2*) [ ]

Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period: 08/09/2010 To 07/31/2017 Cost/Fee: LOE:

This Action:

Total:

Work Plan / Cost Estimate Approvals

Contractor WP Dated: Cost/Fee LOE:

Cumulative Approved: Cost/Fee LOE:

Work Assignment Manager Name Jennifer Wendel (Signature) (Date)	Branch/Mail Code: Phone Number: 404-562-8799 FAX Number:	
Project Officer Name Crystal Gatson (Signature) (Date)	Branch/Mail Code: Phone Number: 703-603-9023 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Mark Heare (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-4774 FAX Number:	

Performance Work Statement
Work Assignment Number: 4-02
August 1, 2016-July 31, 2017

I. ADMINISTRATIVE

A. Title: National Priorities List (NPL) Response to Public Comments, Petitions and Lawsuits

B. Work Assignment Contracting Officer Representative (WA COR):

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C. Objective

This work assignment tasks the contractor to support the Agency in its Response to Comments (RTC) efforts for sites proposed to the NPL.

- For a proposed site receiving public comment, the contractor shall analyze public comments and draft responses to the comments.

- Should a party decide to petition the Agency, or sue to contest issues relating to Final NPL listing, the contractor shall help prepare materials in support of the contested Agency decision. For example, the contractor shall evaluate technical issues raised in the petition/brief and make recommendations on the best technical response, providing references to support the response. A petition may be related to a listing issue and not a specific site (for example, a petition was received related to the lead toxicity level used in the Hazard Ranking System (HRS)). The contractor shall address this type of issue in a manner similar to how it addresses site-specific petitions.

- Occasionally, late comments and petitions are received after a site has been placed on the Final NPL. EPA Office of General Counsel (OGC) may still request that SARDB evaluate the merits of the submittal and respond to the petitioner. The contractor shall evaluate and prepare responses to petitioners as determined appropriate by the EPA WA COR.

D. Background

Federal responsibility for the assessment and cleanup of sites contaminated by hazardous wastes resides with the U.S. EPA under the authority of several statutes, including the Comprehensive Environmental Response Compensation Liability Act (CERLA). The Office of Solid Waste and Emergency Response (OSWER), Office of Superfund Remediation and Technology Innovation (OSRTI), is one of EPA's primary offices for implementation of CERCLA. In implementing the Superfund program, the Office of Superfund Remediation and Technology Innovation must coordinate with other media, especially the Office of Water. A high proportion of Superfund Sites have exposure pathways through water, and specifically groundwater (e.g., groundwater remediation to protect drinking water sources and supplies). OSRTI and OW have established a collaborative relationship to ensure that there is "one program" front in the protection of human health and the environment.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) enacted in 1980, and amended by the Superfund Amendments and Reauthorization Act (SARA), provide the Federal Government broad authority for responding to the dangers posed by uncontrolled releases of hazardous substances, pollutants, and contaminants. CERCLA required the Federal Government to establish criteria for setting priorities among releases of hazardous substances, pollutants and contaminants. The EPA responded by developing the Hazard Ranking System (HRS), which is a scoring system used to establish the National Priorities List (NPL). Sites must score 28.50 or greater to be eligible for listing under the HRS. At EPA, the Site Assessment and Remedy Decisions Branch (SARDB) in OSRTI has the responsibility of placing sites on the NPL. SARDB has established the goal of publishing two Proposed Rules and two Final Rules per year.

Sites are placed on the NPL in a two-step process. First, sites are proposed and public comment solicited. Second, sites that still meet the listing criteria after consideration of comments are included in a Final Rule. The number of sites receiving comments varies; over the past several rules the number has ranged from none to all. On average, approximately twenty-five percent of the proposed sites receive substantial comments from the public and another twenty-five percent receive lesser or minor comments.

Public comments typically claim that EPA made errors in the site HRS and/or data quality analyses, or that policy issues preclude listing the site. The comments are analyzed for new information or alternate interpretations that would cause EPA to change the score and/or decide that the site should not be listed. Sites may be dropped from consideration at this stage due to new data, policy issues, or proof that the original HRS analysis supporting listing of the site was faulty. The current schedule for NPL Proposed and Final Rules is two per year, one in March and one in September. Additional Proposed Rules or Final Rules are possible, but unlikely, for high-priority sites.

The Site Assessment and Remedy Decisions Branch (SARDB) in OSRTI is responsible for discovering sites, evaluating their potential threat to human health and the environment, implementing the HRS, proposing and adding them to the NPL and maintaining public information regarding these activities via the web and other OSRTI data systems. A key component of implementing the HRS is evaluating exposure pathways, including surface and groundwater contamination.

E. Quality Assurance

The tasks in this assignment require the use of secondary data. Collection, use and analysis of data will governed by procedures described in the quality assurance project plan (QAPP) and consistent with the Agencies quality assurance (QA) requirements. The project specific quality assurance requirements must be addressed in the monthly progress reports.

II. TASK DETAIL

The contractor shall perform the following tasks:

TASK 0 - Work Plan and Budget Development

The contractor shall prepare a detailed work plan and budget for the accomplishment of the indicated tasks in accordance with the clause *Work Assignments* (EPAAR 1552.211-74), Alternate I. The work plan shall include cost estimates and a description of: (a) proposed staff; (b) the number of hours and labor classifications proposed for each task, to include both prime contractor and subcontractor labor; and (c) a list of deliverables, with due dates and schedule for deliverables. This task also includes weekly telephone conferences between the WA COR and the project manager, to coordinate and confirm task performance. The contractor shall also submit monthly progress and financial reports pursuant clause F.2 MONTHLY PROGRESS REPORT (EPAAR 1552.211-70).

In tracking LOE expended, the contractor shall identify expenses on a site-specific basis. Site Spill Identifier (SSID) numbers used for tracking sites will have already been provided to the contractor by EPA prior to the site's proposal to the NPL. The contractor shall use these SSID numbers for site-specific charging.

TASK 1 - Analysis and Response to Comment

The contractor shall analyze and summarize public comments received by the EPA Docket during the comment period for sites that have been proposed to the NPL and prepare a draft response to comments ("support document"). All significant technical and policy issues in the comments shall be identified, summarized, and analyzed. The contractor shall analyze the technical issues raised by the public, prepare technical responses supporting the Agency's decisions, and make appropriate changes in the Documentation Record. The contractor shall incorporate policy explanations and reviews as well as other comments provided by the EPA WA COR and OGC.

The contractor's response to comments preparers shall, through the EPA WA COR, contact the Regional NPL Coordinators for Regional input on Response to Comments issues when necessary. The contractor shall notify the EPA WA COR via the status report (see Task #7) if information is not received as needed. In the case of a lengthy expected tum around (e.g., when the Region must perform additional sampling as a result of comments received), a tentative schedule for receipt of the information shall be included in the Status Report. If the lack of receipt of necessary information is jeopardizing a deliverable deadline, the contractor shall notify the EPA WA COR by telephone, and prepare the document to meet the deadline, identifying what additional information is needed to complete the response. The contractor may be tasked to document telephone conversations with the Agency.

The EPA WA COR will participate in and coordinate any communication between the contractor and EPA personnel (other than SARDB members) involved in the review of support documents.

Subtask 1 - Summary of comments: The public comment period officially ends 60 days after the date of Federal Register publication for each proposed rule, unless specifically extended by the Agency. However, comments may come in earlier during the comment period. The contractor shall begin reviewing the comments as soon as they are available from the docket. Within 1 weeks following start of review, the contractor shall meet with SARDB and likely OGC. The contractor shall be prepared to discuss the comments, and shall have ready a suggested approach for responding to the comments. The contractor shall not need to provide a detailed draft response to each comment. Rather, the contractor shall include a brief description of the direction that the contractor recommends for each response, i.e., a few sentences or identification of a "canned response" (e.g., canned response on "Flow Gradient;" see Task 4 below). In addition, the contractor shall highlight any major technical and policy issues that must be resolved by or require input from HQ, OGC, or the Region. At the meeting, decisions will be made on which sites will likely be included in the next final rule, and those sites will be divided into easy to address and difficult to address. The difficult sites shall be addressed first. Timeframes will be issued by the WA COR separately for work on those sites not included in the next final rule because the comments are too extensive, the comment period was extended, or other reasons.

Subtask 2 - First Working Draft of Support Document: For sites identified as difficult to address, the contractor shall prepare the first comprehensive response to comments draft for half of the sites three weeks after the meeting under subtask 1. The first comprehensive draft of the remainder of the difficult sites shall be due two weeks later (5 weeks after the initial meeting under subtask 1). For sites identified as easy to address, the first comprehensive response to comments shall be due 3 weeks later (8 weeks after initial meeting under subtask 1). These support documents shall address all technical, legal, and policy issues raised by commenters (excepting that guidance on the legal and policy issues will be supplied by EPA). If the contractor is awaiting guidance from either the EPA Region or Headquarters on certain issues, the contractor shall nonetheless submit the draft site response to comments document to the EPA WA COR but include in bolded text those issues where EPA regional or HQ input is needed. The technical and editorial quality of each document shall be adequate for HQ/OGC/Regional review. Each document shall be free of significant

technical/editorial problems.

Subtask 3 - Second and Subsequent Versions of Support Document: Once the first version of the support document has been reviewed by EPA Headquarters, the Region, and OGC, the contractor shall revise the support document as second or subsequent versions. For each version, all EPA comments on the previous draft(s) shall be incorporated and/or reasons for not adopting explained. All technical issues shall be addressed fully and accurately. The document shall be free of technical problems and all but minor editorial problems. The contractor shall incorporate EPA comments into the second and subsequent versions as they are being submitted by EPA Headquarters, OGC, and the Region.

Subtask 4 - Final Support Document (for HQ approval): All HQ comments shall be incorporated and all technical, legal and policy issues shall be addressed. All editorial problems shall be addressed.

Subtask 5 - Final Support Document PDF file: For each rule, the contractor shall compile all support documents into PDF files; files shall be paginated. The contractor shall prepare the title page, abstract, contents, executive summary, introduction, and glossary for the PDF files. The PDF files shall be delivered by E-mail concurrently to the information management contractor WAM for posting on the web along with the other NPL rule information, and to the EPA SARDB information management WAM. For planning purposes, the contractor shall assume that it will prepare PDF files for two regularly scheduled final rules plus one special final rule per year.

TASK 2 - Revised Documentation Records

Based on the comments received, the contractor shall determine which HRS documentation records require change(s), and make those changes. The contractor shall also review whether changes need to be made as a result of revised Superfund Chemical Data Matrix (SCDM) values, and if so, shall revise the documentation record accordingly. Generally only specific pages will need to be revised. For planning purposes assume that one-fifth of the sites will require change to the documentation record based on comments received.

TASK 3 - Routine Responses

This task will be conducted on an as needed basis as provided in technical direction by the EPA WA COR. When summarizing public comments, the contractor shall identify comments that can be answered with routine responses already available, and identify issues that occur frequently and for which it would be appropriate to develop new routine responses.

The contractor shall develop a draft of the routine response for EPA WA COR review and/or prepare technical analyses to provide a basis for responses. The contractor shall maintain an index of commonly occurring comments and general response categories which respond to those comments. The nature and scope of this work will be determined by the comments submitted by the public, and may involve significant policy decisions which must be made by the EPA WA COR.

TASK 4 - Key Word Index for Responses
The contractor shall develop an index of key words indicative of the important aspects of certain responses (to be tracked as a routine response). The appropriate key words shall be selected to enable the Agency to identify and track cross-cutting issues for future use in responding to comments, and to identify trends in technical comments, ensuring consistency in the Agency's responses. For planning purposes, the contractor shall assume one keyword index per year.

TASK 5 - Analysis of Cross-cutting Issues
The contractor shall prepare analyses and/or summaries of cross-cutting technical issues raised in comments, lawsuits, and quality assurance (e.g., data quality). This analysis has also been referred to as the "Lessons Learned" report. For planning purposes, the contractor shall assume that one cross-cutting issue shall need to be prepared.

TASK 6 - Status Reports
The purpose of the response to comments status reports is to enable the EPA WA COR to assess the progress of the work effort, brief management, and communicate to the EPA Regional Coordinators when additional information is needed from their Region. The contractor shall prepare a monthly status report. The status report shall include the following information: region, site name, location, staff person assigned to prepare the response to comments, estimated number of hours to complete the current document, and a comment field noting any additional information related to site status. In the case of a more lengthy expected tum-around (e.g., additional sampling required), a tentative schedule for receipt of the information from the Region shall be included in the status report.

TASK 7 - Response to Petitions/Lawsuits
For each petition or lawsuit, the contractor shall provide technical support in addressing and summarizing the technical issues raised by the petitioner and the implication of the lawsuit for other SARDB activities. The EPA WA COR will specify which issues, if not all, the contractor is to address. The contractor shall prepare a report that evaluates and responds to the technical issues in the lawsuits/petitions. The contractor shall: 1) determine whether the technical issues raised are accurate; 2) make recommendations to the SARDB listing group on the best technical response to the issues; and 3) provide references to support the contractor's analyses/recommendation. For planning purposes, the contractor shall assume that it will support EPA on two petitions/lawsuits during the year.

IV. SCHEDULE OF DELIVERABLES

The deliverables shall be due as stated below. The contractor shall provide the WA COR all deliverables and drafts in electronic format only. Electronic files must also be provided upon completion of the work assignment.

Task 0: The Work Plan is due within 20 days after receipt of work assignment. The Monthly Progress Report is due no later than the 15th of each month.

Task 1: **Analysis and Response to Comments**
At the request of the EPA WA COR, the contractor shall summarize completely and accurately issues, technical and otherwise, raised by all parties in

telephone conference calls. Summaries are due within five working days after the telephone conversation.

Subtask 1: Summary of comments and suggested approach

EPA anticipates up to two proposed rulemakings per year. The Public Comment Period officially ends 60 days after the date of Federal Register publication for each Proposed Rule, unless specifically extended by the Agency. The contractor shall start to work as soon as the contractor obtains copies of the public comments. Meetings will take place 1-2 calendar weeks following the availability for review of all comments (sometimes large volume comments must be scanned). The EPA WAM will issue a deliverable date for those sites that will not be in the next final rule and those sites in the rule but needing a different timeframe.

Subtask 2: First Working Draft of Support Document

The contractor shall deliver one electronic copy via E-mail to the EPA WA COR, to the NPL Coordinator in the Region, and to OGC. The deadlines will be either 3, 5, or 8 weeks following the meeting in subtask 1 above, based on the nature and extent of comments. Deadlines for drafts for sites not included in the rule, and if necessary for sites to be included but with unique circumstances, will be provided by the WA COR.

Subtask 3: Second and Subsequent Versions of Support Document

The contractor shall deliver one electronic copy via E-mail to the EPA WA COR, NPL Coordinator in the Region, and OGC. The schedule will be determined by the EPA WA COR following delivery of the first draft.

Subtask 4: Final Support Document (for HQ approval)

The contractor shall deliver one electronic copy via E-mail to the EPA WA COR, to the NPL Coordinator in the Region, and to OGC. The schedule will be determined by the EPA WA COR.

Subtask 5: Final Support Document PDF file

The PDF file shall be delivered by e-mail concurrently to the information management contractor WAM, so that the information can be posted on the web along with the other NPL rule information, and to the EPA WA COR. The final support document PDF files are due 3 business days before publication of a Final Rule, unless the EPA information Management WAM provides a different deliverable date. The EPA Information Management WAM will notify the contractor verbally when the Federal Register publication date is known.

General Requirements for Deliverables for Task #1, Analysis and Response to Comments

- After HQ has reviewed any version of the draft support document, once the contractor has incorporated HQ comments, the contractor shall provide electronic copy via E-mail of the next version.

- Draft support documents shall have a header identifying the version and date.

- The support document shall be annotated, within the text, to clearly identify responses that require a change in the documentation record. This shall be summarized at the end of all versions of the support document, except the final version.

- In all except final versions of support documents, routine responses shall be printed in italics and identified by routine response number.

- The contractor shall incorporate all Agency comments on support document language or structure into the document, or identify why the contractor believes this should not be done. New material added since the previous draft shall be identified by the appropriate Microsoft Word function. In addition, text that EPA suggests be deleted shall be identified appropriately.

- If the contractor has questions, comments, or suggestions, the contractor shall provide alternate wording and/or explanatory remarks as appropriate. The contractor shall identify these additions in the document by indenting and printing in bold.

- The contractor shall track documents through the production and editorial process using their existing Revision Control System.

Task 2: **Revised Documentation Records**

An electronic copy of the revised documentation records shall be delivered to the HQ Docket, and shall include new references not generally publicly available that were added as a result of the comments. Docket submission of completed, revised documentation records are due one week prior to publication, unless otherwise specified by the EPA WA COR.

Task 3: **Routine Responses**

As directed by the EPA WA COR, the contractor shall update specific routine comments. One copy of the draft routine response is due ten business days after request, unless otherwise specified by the EPA WA COR. Final routine responses are due five business days after receipt of EPA comments.

Task 4: **Key Word Indexes for Responses**

As directed by the EPA WA COR, the contractor shall prepare a key word index for responses for a final rule. One electronic copy shall be delivered to the EPA WA COR. The key word index for responses for a final rule is due 90 calendar days after publication of the final rule, unless otherwise specified by the EPA WA COR.

Task 5: **Analysis of Cross-cutting Issues**

One hard copy and one electronic copy via E-mail of the analysis shall be delivered to the EPA WAM. The schedule will be determined by the EPA WAM for specific updates, up to 60 calendar days after publication of the final rule.

Task 6: **Response to Petitions/Lawsuits**

The original hard copy and one electronic copy via E-mail of the report shall be delivered to the EPA WA COR. The EPA WA COR will establish the due date for specific petitions/lawsuit s, depending on the schedule set by the U.S. Court of Appeals.

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 4-02

☐ Other ☒ Amendment Number: 000001

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-W-10-016	08/09/2010 To 01/31/2018 Base Option Period Number 4	NPL Responses to Comments

Contractor: CSRA LLC

Specify Section and paragraph of Contract SOW: Task 2

Purpose:
- ☐ Work Assignment
- ☒ Work Assignment Amendment
- ☐ Work Plan Approval
- ☐ Work Assignment Close-Out
- ☐ Incremental Funding

Period of Performance: From 08/01/2016 To 01/31/2018

Comments:
The purpose of this work assignment amendment is to extend the period of performance of this WA 4-02 to January 31, 2018. The contractor shall submit a revised cost estimate for the period of the extension. All other task requirements from the WA 4-02 PWS remain unchanged.

☒ Superfund — Accounting and Appropriations Data — ☐ Non-Superfund

Note: To report additional accounting and appropriations date use EPA Form 1900-69A.

SFO (*Max 2*) ☐

Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
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Authorized Work Assignment Ceiling

Contract Period: 08/09/2010 To 01/31/2018 Cost/Fee: LOE:

This Action:

Total:

Work Plan / Cost Estimate Approvals

Contractor WP Dated: Cost/Fee LOE:

Cumulative Approved: Cost/Fee LOE:

Work Assignment Manager Name Jennifer Wendel (Signature) (Date)	Branch/Mail Code: Phone Number: 404-562-8799 FAX Number:	
Project Officer Name Crystal Mitchell (Signature) (Date)	Branch/Mail Code: Phone Number: 703-603-9023 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Jose E. Ortiz (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-6762 FAX Number:	

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 4-02

☐ Other ☒ Amendment Number: 000002

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-W-10-016	08/09/2010 To 05/31/2019 Base Option Period Number 4	NPL Response to Comments

Contractor: CSRA LLC

Specify Section and paragraph of Contract SOW: Task 1, 4-7

Purpose:
- ☐ Work Assignment
- ☒ Work Assignment Amendment
- ☐ Work Plan Approval
- ☐ Work Assignment Close-Out
- ☐ Incremental Funding

Period of Performance: From 08/01/2016 To 06/14/2018

Comments:
In accordance with Mod 66, the purpose of this amendment is to extend the period of performance through June 14, 2018.

☒ Superfund — Accounting and Appropriations Data — ☐ Non-Superfund

SFO (*Max 2*) ☐

Note: To report additional accounting and appropriations date use EPA Form 1900-69A.

Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
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Performance Work Statement
Work Assignment Number: 4-02
February 1, 2018 to May 31, 2018

I. ADMINISTRATIVE

A. Title: National Priorities List (NPL) Response to Public Comments, Petitions and Lawsuits

B. Work Assignment Manager:

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Alternate Work Assignment Manager:
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e-mail:jeng.terry@epa.gov

C. Objective

This work assignment tasks the contractor to support the Agency in its Response to Comments (RTC) efforts for sites proposed to the NPL. Several distinct categories of work may be involved:

- For a proposed site receiving public comment, the contractor shall analyze public comments and draft responses to the comments.

- Should a party decide to petition the Agency, or sue to contest issues relating to Final NPL listing, the contractor shall help prepare materials in support of the contested Agency decision. For example, the contractor shall evaluate technical issues raised in the petition/brief and make recommendations on the best technical response, providing references to support the response. A petition may be related to a listing issue and not a specific site (for example, a petition was received related to the lead toxicity level used in the Hazard Ranking System (HRS)). The contractor shall address this type of issue in a manner similar to how it addresses site-specific petitions.

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TASK 1: Analysis and Response to Comment

The contractor shall analyze and summarize public comments received by the EPA Docket during the comment period for sites that have been proposed to the NPL and prepare a draft response to comments ("support document"). All significant technical and policy issues in the comments shall be identified, summarized, and analyzed. The contractor shall analyze the technical issues raised by the public, prepare technical responses supporting the Agency's decisions, and make appropriate changes in the Documentation Record. The contractor shall incorporate policy explanations and reviews as well as other comments provided by the EPA WAM and OGC.

The contractors response to comments preparers shall, through the EPA WAM, contact the Regional NPL Coordinators for Regional input on Response to Comments issues when necessary. The contractor shall notify the EPA WAM via the status report (see Task #7) if information is not received as needed. In the case of a lengthy expected tum around (e.g., when the Region must perform additional sampling as a result of comments received), a tentative schedule for receipt of the information shall be included in the Status Report. Ifnon-receipt of necessary information is jeopardizing a deliverable deadline, the contractor shall notify the EPA WAM by telephone, and prepare the document to meet the deadline, identifying what additional information is needed to complete the response. The contractor may be tasked to document telephone conversations with the Agency.

The EPA WAM will participate in and coordinate any communication between the contractor and EPA personnel (other than SARDB members) involved in the review of support documents.

Subtask 1 - Summary of comments: The public comment period officially ends 60 days after the date of Federal Register publication for each proposed rule, unless specifically extended by the Agency. However, comments may come in earlier during the comment period. The contractor shall begin reviewing the comments as soon as they are available from the docket. Within 1 *Yi* weeks following start of review, the contractor shall meet with SARDB and likely OGC. The contractor will be prepared to discuss the comments, and will have ready a suggested approach for responding to the comments. The contractor shall not need to provide a detailed draft response to each comment. Rather, the contractor shall include a brief description of the direction that the contractor recommends for each response, i.e., a few sentences or identification of a "canned response" (e.g., canned response on "Flow Gradient;" see Task 4 below). In addition, the contractor shall highlight any major technical and policy issues that must be resolved by or require input from HQ, OGC, or the Region. At the meeting, decisions will be made on which sites will likely be included in the next final rule, and those sites will be divided into easy to address and difficult to address. The difficult sites will be addressed first. Timeframes will be issued by the WAM separately for work on those sites not included in the next final rule because the comments are too extensive, the comment period was extended, or other reasons.

Subtask 2 - First Working Draft of Support Document: For sites identified as difficult to address, the contractor shall prepare the first comprehensive response to comments draft for half of the sites three weeks after the meeting under subtask 1. The first comprehensive draft of the remainder of the difficult sites will be due two weeks later (5 weeks after the initial meeting under subtask 1). For sites identified as easy to address, the first comprehensive response to comments will be due 3 weeks later (8 weeks after initial meeting under subtask 1). These support documents shall address all technical, legal, and policy issues raised by commenters (excepting that guidance on the legal and policy issues will be supplied by EPA). If the contractor is awaiting guidance from either the EPA Region or Headquarters on certain issues, the contractor shall nonetheless submit the draft site response to comments document to the EPA WAM but include in bolded text those issues where EPA regional or HQ input is needed. The technical and editorial quality of each document shall be adequate for HQ/OGC/Regional review. Each document shall be free of significant technical/editorial problems.

Subtask 3 - Second and Subsequent Versions of Support Document: Once the first version of the support document has been reviewed by EPA Headquarters, the Region, and OGC, the contractor shall revise the support document as second or subsequent versions. For each version, all EPA comments on the previous draft(s) shall be incorporated and/or reasons for not adopting explained. All technical issues shall be addressed fully and accurately. The document shall be free of technical problems and all but minor editorial problems. The contractor shall start incorporating EPA comments into the second and subsequent versions as they are being submitted by EPA Headquarters, OGC, and the Region.

Subtask 4 - Final Support Document (for HQ approval): All HQ comments shall be incorporated and all technical, legal and policy issues shall be addressed. All editorial problems shall be addressed.

Subtask 5 - Final Support Document PDF file: For each rule, the contractor shall compile all support documents into PDF files; files shall be paginated. The contractor shall prepare the title page, abstract, contents, executive summary, introduction, and glossary for the PDF files. The PDF files shall be delivered by E-mail concurrently to the information management contractor WAM for posting on the web along with the other NPL rule information, and to the EPA SARDB information management WAM. For planning purposes, the contractor should assume that it will prepare PDF files for two regularly scheduled final rules plus one special final rule per year.

Task 2: Revised Documentation Records

Based on the comments received, the contractor shall determine which HRS documentation records require change(s), and make those changes. The contractor shall also review whether changes need to be made as a result of revised Superfund Chemical Data Matrix (SCDM) values, and if so, shall revise the documentation record accordingly. Generally only specific pages will need to be revised. For planning purposes assume that one-fifth of the sites will require change to the documentation record based on comments received.

Task 3: Routine Responses

This task will be conducted on an as needed basis as directed by the EPA WAM. When summarizing public comments, the contractor shall identify comments that can be answered with routine responses already available, and identify issues that occur frequently and for which it would be appropriate to develop new routine responses.

The contractor shall develop a draft of the routine response for EPA WAM review and/or prepare technical analyses to provide a basis for responses. The contractor shall maintain an index of commonly occurring comments and general response categories which respond to those comments. The nature and scope of this work will be determined by the comments submitted by the public, and may involve significant policy decisions which must be made by the EPA WAM.

Task 4: Key Word Index for Responses
The contractor shall develop an index of key words indicative of the important aspects of certain responses (to be tracked as a routine response). The appropriate key words shall be selected to enable the Agency to identify and track cross-cutting issues for future use in responding to comments, and to identify trends in technical comments, ensuring consistency in the Agency's responses. For planning purposes, assume one keyword index per year.

Task 5: Analysis of Cross-cutting Issues
The contractor shall prepare analyses and/or summaries of cross-cutting technical issues raised in comments, lawsuits, and quality assurance (e.g., data quality). This analysis has also been referred to as the "Lessons Learned" report. For planning purposes, the contractor shall assume that one cross-cutting issue shall need to be prepared.

Task 6: Status Reports
The purpose of the response to comments status reports is to enable the EPA WAM to assess the progress of the work effort, brief management, and communicate to the EPA Regional Coordinators when additional information is needed from their Region. The contractor shall prepare a monthly status report. The status report shall include the following information: region, site name, location, staff person assigned to prepare the response to comments, estimated number of hours to complete the current document, and a comment field noting any additional information related to site status. In the case of a more lengthy expected tum-around (e.g., additional sampling required), a tentative schedule for receipt of the information from the Region shall be included in the status report.

Task 7: Response to Petitions/Lawsuits
For each petition or lawsuit, the contractor shall provide technical support in addressing/summarizing the technical issues raised by the petitioner and/or the implication of the lawsuit for other SARDB activities. The EPA WAM will specify which issues, if not all, the contractor is to address. The contractor shall prepare a report that evaluates and responds to the technical issues in the lawsuits/petitions. The contractor shall: 1) determine whether the technical issues raised are accurate; 2) make recommendations to the SARDB listing group on the best technical response to the issues; and 3) provide references to support the contractor's analyses/recommendation. For P-level distribution purposes, the contractor shall assume that it will support EPA on two petitions/lawsuits during the year.

IV. SCHEDULE OF DELIVERABLES

The deliverables shall be due as stated below. The contractor shall provide the WAM all deliverables and drafts in electronic format only. Electronic files must also be provided upon completion of the work assignment.

Task 0: The Work Plan is due within 20 days after receipt of work assignment. The Monthly Progress Report is due no later than the 15th of each month.

Task 1: **Analysis and Response to Comments**
At the request of the EPA WAM, the contractor shall summarize completely and accurately issues, technical and otherwise, raised by all parties in telephone conference calls. Summaries are due within five working days after

the telephone conversation.

Subtask 1: Summary of comments and suggested approach
EPA anticipates up to two proposed rulemakings per year. The Public Comment Period officially ends 60 days after the date of Federal Register publication for each Proposed Rule, unless specifically extended by the Agency. The contractor shall start to work as soon as the contractor obtains copies of the public comments. Meetings will take place 1-2 calendar weeks following the availability for review of all comments (sometimes large volume comments must be scanned). The EPA WAM will issue a deliverable date for those sites that will not be in the next final rule and those sites in the rule but needing a different timeframe.

Subtask 2: First Working Draft of Support Document
The contractor shall deliver one electronic copy via E-mail to the EPA WAM, to the NPL Coordinator in the Region, and to OGC. The deadlines will be either 3, 5, or 8 weeks following the meeting in subtask 1 above, based on the nature and extent of comments. Deadlines for drafts for sites not included in the rule, and if necessary for sites to be included but with unique circumstances, will be provided by the WAM.

Subtask 3: Second and Subsequent Versions of Support Document
The contractor shall deliver one electronic copy via E-mail to the EPA WAM, NPL Coordinator in the Region, and OGC. The schedule will be determined by the EPA WAM following delivery of the first draft.

Subtask 4: Final Support Document (for HQ approval)
The contractor shall deliver one electronic copy via E-mail to the EPA WAM, to the NPL Coordinator in the Region, and to OGC. The schedule will be determined by the EPA WAM.

Subtask 5: Final Support Document PDF file
The PDF file shall be delivered by e-mail concurrently to the information management contractor WAM, so that the information can be posted on the web along with the other NPL rule information, and to the EPA WAM. The final support document PDF files are due 3 business days before publication of a Final Rule, unless the EPA information Management WAM provides a different deliverable date. The EPA Information Management WAM will notify the contractor verbally when the Federal Register publication date is known.

General Requirements for Deliverables for Task #1, Analysis and Response to Comments

- After HQ has reviewed any version of the draft support document, once the contractor has incorporated HQ comments, the contractor shall provide electronic copy via E-mail of the next version.

- Draft support documents shall have a header identifying the version and date.

- The support document shall be annotated, within the text, to clearly identify responses that require a change in the documentation record. This shall be summarized at the end of all versions of the support document, except the final version.

- In all except final versions of support documents, routine responses shall be printed in italics and identified by routine response number.

- The contractor shall incorporate all Agency comments on support document language or structure into the document, or identify why the contractor believes this should not be done. New material added since the previous draft shall be identified by the appropriate Microsoft Word function. In addition, text that EPA suggests be deleted shall be identified appropriately.

- If the contractor has questions, comments, or suggestions, the contractor shall provide alternate wording and/or explanatory remarks as appropriate. The contractor shall identify these additions in the document by indenting and printing in bold.

- The contractor shall track documents through the production and editorial process using their existing Revision Control System.

Task 2: **Revised Documentation Records**

An electronic copy of the revised documentation records shall be delivered to the HQ Docket, and shall include new references not generally publicly available that were added as a result of the comments. Docket submission of completed, revised documentation records are due one week prior to publication, unless otherwise specified by the EPA WAM.

Task 3: **Routine Responses**

As directed by the EPA WAM, the contractor shall update specific routine comments. One copy of the draft routine response is due ten business days after request, unless otherwise specified by the EPA WAM. Final routine responses are due five business days after receipt of EPA comments.

Task 4: **Key Word Indexes for Responses**

As directed by the EPA WAM, the contractor shall prepare a key word index for responses for a final rule. One electronic copy shall be delivered to the EPA WAM. The key word index for responses for a final rule is due 90 calendar days after publication of the final rule, unless otherwise specified by the EPA WAM.

Task 5: **Analysis of Cross-cutting Issues**

One hard copy and one electronic copy via E-mail of the analysis shall be delivered to the EPA WAM. The schedule will be determined by the EPA WAM for specific updates, up to 60 calendar days after publication of the final rule.

Task 6: **Response to Petitions/Lawsuits**

The original hard copy and one electronic copy via E-mail of the report shall be delivered to the EPA WAM. The EPA WAM will establish the due date for specific petitions/lawsuit s, depending on the schedule set by the U.S. Court of Appeals.

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 4-02

☐ Other ☒ Amendment Number: 000003

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-W-10-016	08/09/2010 To 05/31/2019 Base Option Period Number 4	Support for NPL Updates

Contractor: CSRA LLC

Specify Section and paragraph of Contract SOW: Task 1, 4-7

Purpose:
- ☐ Work Assignment
- ☒ Work Assignment Amendment
- ☐ Work Plan Approval
- ☐ Work Assignment Close-Out
- ☐ Incremental Funding

Period of Performance: From 08/01/2016 To 05/31/2019

Comments:
In accordance with Mod 67, the purpose of this amendment is to extend the period of performance through May 31, 2019.

☒ Superfund — Accounting and Appropriations Data — ☐ Non-Superfund

SFO (*Max 2*) ☐

Note: To report additional accounting and appropriations date use EPA Form 1900-69A.

Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period: 08/09/2010 To 05/31/2019 Cost/Fee: LOE:

This Action:

Total:

Work Plan / Cost Estimate Approvals

Contractor WP Dated: Cost/Fee LOE:

Cumulative Approved: Cost/Fee LOE:

Work Assignment Manager Name Jennifer Wendel (Signature) (Date)	Branch/Mail Code: Phone Number: 404-562-8799 FAX Number:	
Project Officer Name Jennifer Wendel (Signature) (Date)	Branch/Mail Code: Phone Number: 404-562-8799 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Marneice Bivins (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-4513 FAX Number:	