**PERFORMANCE WORK STATEMENT**
**Contract: EP-C-15-022**
**Work Assignment No. 2-94**
**Period of Performance: 7/1/17-6/30/18**

## I. ADMINISTRATIVE

**A. Title: Organizing Dewey-Burdock's Public Comments (for the Region 8 proposed Dewey-Burdock in-situ recovery uranium recovery project)**

**B. Work Assignment Manager:** **Alternate (as applicable)**

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**C. Quality Assurance:**

The administrative nature of this work assignment does not involve the use of primary and/or secondary data. When the WA does not involve the use of primary and/or secondary data, a QAPP is not required.

**D. Background:**

The EPA is the action agency proposing three distinct but related actions: a Class III UIC permit to specify the conditions for injection of fluid into uranium ore zones; an aquifer exemption for the Class III injection areas; and a Class V disposal permit to dispose of treated waste fluids from the uranium mining operation. These actions are regulated under the Safe Drinking Water Act and its regulations at 40 CFR parts 124, 144 and 146. Certain conditions apply to all UIC permits and may be incorporated either expressly or by reference. Additionally, UIC regulations specific to injection wells in South Dakota are found at 40 CFR 147 part QQ.

As part of the administrative record for the draft UIC permits and proposed aquifer exemption are a draft cumulative effects analysis document, a draft environmental justice analysis document and a draft document proposing the EPA's plan for complying with Section 106 of the National Historic Preservation Act. These documents are also available for public review and comment.

The UIC permitting process requires a public notice period. Over 8,000 public comments pertaining to the Dewey-Burdock project have been received by EPA Region 8 as of June 9, 2017. In order for Region 8 UIC personnel to properly manage and assess the comments, the comments must first be organized into categories. The contractor support is specifically needed to organize the public comments.

## II. OBJECTIVE

In two phases of work effort, the contractor is to provide the Region 8 UIC Unit with two documents:
(1) A document containing all public comments compiled from e-mailed comments, mailed letters and postcards, and written comments submitted to the EPA during the public hearings.



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(2) A document that includes all the public comments compiled in the first document, plus comments from the five (5) Dewey-Burdock public hearing transcripts, organized under separate categories based on the content of each comment.

To initiate this work, Region 8 will supply the contractor with the electronic files of the transcripts, emails and mailed letters, written comments received during the public hearings and the comment categories. Comments received from a single individual may need to be broken out and split into more than one category. The deliverables will consist of the two documents listed above. The first document should be in Adobe Acrobat format with searchable text; the second document should be provided in the contractor's latest version of Microsoft Word.

## III. TASK DETAIL

The contractor shall perform the following tasks:

**Task 1: Compiling all the written public comments received by the EPA on the UIC proposed actions into one document. (PWS Area 4.3, 6.1.9)**

The EPA will provide the Contractor with:

A. Approximately 10,000 template emails by either sharing the Outlook folder or by forwarding the emails to an email account to be provided by the contractor, and

B. Approximately 2,000 pages of documents in Word or pdf format containing the written public comments received with through email or mail or during the public hearings (not including the transcripts from the public hearings).

**Subtask 1.1: Template Email Review**
The Contractor shall review approximately 9,000 – 10,000 Outlook emails that are mostly identical (see template below) to identify additional comments or text that may have been added by the individual senders.

For clarity and purposes of understanding the nature of the emails, the emails originated from this website: [ HYPERLINK "http://org.salsalabs.com/o/676/p/dia/action4/common/public/?action_KEY=21716&tag=mining" ] The email consists of a template that can be edited by the email sender. Most of the template emails received by the EPA to day appear to include no edits to the template.

If the Contractor identifies any edits to the template or additional comments added to the template email by the individual sender, the edited portion or the additional comment should also be included in the compiled comments.

Template for Mass Email:
*Dear EPA,*

*Thank you for the opportunity to comment on the Underground Injection Control Program's Draft Permits for the Proposed Dewey-Burdock Uranium Mine and Deep Disposal Wells.*

*The proposed mine and deep disposal wells are in an area that is documented to have faults, fractures, breccia pipes, and over 7000 old boreholes that have not been properly plugged. It will be impossible to contain mining fluids or waste liquids, and contamination of groundwater resources is very likely.*

*I am also concerned that adequate oversight of the quality of liquid wastes pumped into the Minnelusa Formation through the proposed deep disposal wells will be inadequate, and groundwater is likely to be contaminated.*

*A full survey of cultural and historical sites is needed before mining or deep disposal is allowed. Cultural and historical sites must be protected.*

*The history of uranium mining indicates that uranium mining cannot be done without creating and leaving contamination. Groundwater has never been returned to its original condition at any In-Situ leach uranium mine in the U.S. These permits should not be issued until it can be demonstrated that groundwater resources will be protected.*

Ex. 6 Personal Privacy (PP)

**Subtask 1.2: Generation of Document Containing Written Comments Received by the EPA.** The contractor will compile all the comments from sources A and B above into one document.

The format of this document should be Adobe Acrobat with searchable text. The EPA will post this document on the Region 8 UIC Program website where it will be available for public access and review.

For estimation purposes, there will be approximately 2,000 pages of written comments from letters, emails and other written comments. The EPA will provide the written comments to the contractor as electronic files in Microsoft Word or pdf format with the name of the commenter included to identify the source of the comments.

NOTE: Following receipt of the email folder and written comments from the WA-COR, the Contractor shall generate the first document within 20 business days.

**Task 2: Categorization of all the public comments received by the EPA on the UIC proposed actions in one document. (PWS Area 4.3, 6.1.9)**

The contractor will generate the second document using the document generated under Task 1 and the comments from the five (5) public hearing transcripts.

The EPA will provide the Contractor with:

A. The five (5) public hearing transcripts in Adobe Acrobat pdf format, and
B. A list of categories under which comments shall be sorted and categorized.



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For estimation purposes, the five (5) public hearing transcripts contain a total of 840 pages of testimonies by different individuals. The transcripts are in pdf format from which sentences or phrases can be highlighted, copied and pasted under the different topic categories.

Comments from a single source may need to be broken out and split into more than one category. As the different sentences or paragraphs from the written comments and testimonies are sorted out into the appropriate topics/categories, the name of the person who wrote the comment should be included after each extracted portion of the comment.

The categories provided by the EPA are based on the early comments received and topics raised during the public hearings. The contractor may identify and include additional categories or further break down and refine categories as appropriate to efficiently categorize the comments.

This document should be provided to the EPA as a Microsoft Word document. The exact format may be determined by the contractor in coordination with the EPA to identify the most efficient manner of organizing the comments under the various categories to facilitate the generation of the document and the review of the comments by the EPA.

**Deliverables:**

1. The Adobe Acrobat, word-searchable document containing all written comments.
2. Final Microsoft Word document containing all the written and transcript comments separated out by topic. The contractor may format the document in any manner that facilitates document generation and review as long as the topic headings are clearly identified.

## IV. SCHEDULE OF DELIVERABLES:

| TASK NO. | DELIVERABLE | DATE DUE TO EPA |
|---|---|---|
| 1 | Adobe acrobat pdf word-searchable document containing all written comments. | Within 20 business days after start of WA. |
| | | |
| 2 | Microsoft Word document containing all of the written and transcript comments separated out by topic. | Within 50 business days after start of WA. |
| | - The EPA would like for the opportunity to preview the document after the 15 and 30 business day increments. The preview may occur via web conference and conference calls. | Web conference/conference call after 15 business days.<br><br>Web conference/conference call after 30 business days. |
| | | |

## V. MISCELLANEOUS

Software Application Files and Accessibility

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, §1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: http://www.section508.gov/



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Preferred text format: MS Word, 8.0 or higher (Office 2003 or higher)

## VI. TRAVEL

No travel is required for the accomplishment of this work assignment.

## VII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS

Conference participation is not required for the accomplishment of this work assignment.
Conference calls, telephone conversations, and e-mail exchanges with UIC employees of EPA Region 8 is anticipated. However, this communication will be for coordination and clarification purposes only, none of these communications will change the scope of work of the work document.

## VIII. CONTRACTOR IDENTIFICATION

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

## IX. PRINTING

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

## X. TECHNICAL DIRECTION

The Contract level COR, Work Assignment Manager (WAM), or an authorized individual is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the Statement of Work, (2) Comments on and approval of deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance. One copy of the technical direction memorandum will be forwarded to the Contracting Officer and the Contract Level Contracting Officer Representative.

## XI. QUALITY ASSURANCE SURVEILLANCE PLAN

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WAM based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards.



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