

# **EXHIBIT B – SCOPE OF WORK AND SCHEDULE**

## **SCOPE OF WORK**

### **PURPOSE**

The work under this Enforcement Order (EO) involves implementing the Cleanup Action Plan to address soil contamination at the Aluminum Recycling Trentwood Site in Spokane, WA. This Scope of Work is to be used to develop work plans in order to complete the remedial actions required by the Cleanup Action Plan at the Site.

The Subject PLP will coordinate with Ecology throughout the development of all tasks and will keep Ecology informed of changes to any Work Plan or other project plans, and of any issues or problems as they develop. The Subject PLP will furnish all personnel, materials, and services necessary for, or incidental to, performing the cleanup action selected for the Site.

The Scope of Work (SOW) contains the following tasks, to be accomplished in accordance with the schedule below.

### **TASK 1. ENGINEERING DESIGN REPORT**

The Subject PLP will prepare an Engineering Design Report (EDR) which will comply with the requirements of WAC 173-340-400(4)(a). The EDR will describe key concepts and design criteria for components of the cleanup action. It should include:

- maps identifying existing site conditions
- anticipated volumes, depths and areal extents of excavations
- soil excavation and disposal plan, including proposed transportation routes
- engineered cap compositions and thicknesses
- material and design specifications
- planned final grades and cross-sections
- compaction requirements
- stormwater management designs for both during and after implementation of the cleanup action
- specific measures to manage short-term hazards associated with the construction phase of the cleanup action, including but not limited to dust control, surface water/stormwater runoff management, accidental spill response, the specifics of any quality control testing to be performed
- a compliance monitoring plan prepared under WAC 173-340-410 describing monitoring to be performed during construction
- a sampling and analysis plan meeting the requirements of WAC 173-340-820
- additional information needed to address applicable state, federal, and local requirements

In addition, the EDR will include a health and safety plan to be following during the cleanup action. The health and safety plan will conform to WAC 173-340-810 and include emergency information, characteristics of waste, levels of protection, hazard evaluation, and any other applicable site specific information such as working on/near active rail lines. The health and safety plan will also include information pertinent to transport of waste by truck, including any traffic control measures, traffic safety, routes, and securing loads.

The Subject PLP will provide Ecology with an Agency Review Draft EDR. Once Ecology reviews and approves the EDR, it will be considered the Final EDR. The EDR will not be implemented until approved by Ecology. Once approved by Ecology, the Subject PLP will implement the Final EDR according to the schedule contained in this Exhibit.

The Subject PLP will prepare and submit two electronic copies of the Agency Review Draft EDR, one each in Word (.doc) and Adobe (.pdf) formats, to Ecology for review and comment. After incorporating Ecology's comments on the Agency Review Draft EDR and after Ecology approval, the Subject PLP will prepare one copy of the Final EDR and submit it, including one electronic copy each in Word (.doc) and Adobe (.pdf) formats, to Ecology.

## **TASK 2. OPERATIONS AND MAINTENANCE PLAN**

The Subject PLP will develop an Operations and Maintenance (O&M) Plan in accordance with WAC 173-340-400(4)(c) for the engineered cover. It is intended to present procedures to assure ongoing protection to human health and the environment after completion of the remedy. The O&M Plan should include procedures for maintenance of the remedy, any contingency procedures, monitoring and reporting schedules, and persons responsible for tasks. The O&M Plan should also provide for continued implementation of any institutional controls associated with the remedy, such as access controls or signage.

## **TASK 3. SEPA COMPLIANCE**

The Subject PLP will be responsible for complying with the State Environmental Policy Act (SEPA) Rules including preparing and submitting an environmental checklist. If the result of the threshold determination is a determination of significance (DS), the Subject PLP will be responsible for the preparation of Draft and final environmental impact statements. The Subject PLP will assist Ecology with coordinating SEPA public involvement requirements with MTCA public involvement requirements whenever possible, such that public comment periods and meetings or hearings can be held concurrently.

## **TASK 4. PROGRESS REPORTS**

The Subject PLP will complete monthly progress reports in accordance with Section VII.E of the Enforcement Order. They should include:

- A list of activities that have taken place;
- Detailed descriptions of any deviations from required tasks not otherwise documents in project plans or amendment requests;

- Description of all deviations from this Scope of Work and Schedule for the current month and any planned deviations in the upcoming month;
- For any deviations in schedule, a plan for recovering lost time and maintaining compliance with the schedule;
- All raw data (including laboratory analyses) received during the reporting month; and
- A list of deliverables for the upcoming month if different from the schedule.

**TASK 5. CLEANUP ACTION REPORT**

The Subject PLP will submit a draft Cleanup Action Report in accordance with WAC 173-340-400 no later than 90 days after completion of the cleanup construction, defined as the end of physical work at the site. The Cleanup Action Report will include final representations of the work performed, all laboratory data, any deviations from the EDR, and documentation of institutional controls.

## SCHEDULE OF DELIVERABLES

The schedule for deliverables described in the Enforcement Order and the Scope of Work is presented below. If the date for submission of any item or notification required by this Schedule of Deliverables occurs on a weekend, state or federal holiday, the date for submission of that item or notification is extended to the next business day following the weekend or holiday. Where a deliverable due date is triggered by Ecology notification, comments or approval, the starting date for the period shown is the date the Subject PLP received such notification, comments or approval. Where triggered by Ecology receipt of a deliverable, the starting date for the period shown is the date Ecology receives the deliverable.

<b>Deliverables</b>	<b>Completion Times</b>
Effective date of Enforcement Order	Start
Subject PLP submits Agency Review Draft EDR, O&M Plan, and Schedule of Work to be Performed	90 calendar days following effective date of the Enforcement Order
Subject PLP submits Final EDR, O&M Plan, and Schedule of Work to be Performed	30 calendar days after subject PLP receives Ecology written comments on draft documents
Subject PLP begins implementation of remedial action following Schedule of Work to be Performed	30 days after Subject PLP receives written approval of plans from Ecology
Subject PLP submits Agency Review Draft Cleanup Action Report	90 days after completion of construction
Subject PLP submits Final Cleanup Action Report	30 days after Subject PLP receives written approval of report from Ecology
Subject PLP submits a recorded Environmental Covenant	30 days after Ecology approval of final Cleanup Action Report
Subject PLP submits Progress Reports	Monthly, in accordance with Section VII.E of Enforcement Order, beginning at the Start and ending with Ecology approval of final Cleanup Action Report