

Emergency interim action scope of work and schedule

Scope of work

Purpose

Remedial actions implemented prior to completion of the remedial investigation and feasibility study (RI/FS) that will be considered interim actions include those that:

- Are technically necessary to reduce a threat to human health or the environment by eliminating or substantially reducing one or more pathways for exposure to a hazardous substance.
- Correct a problem that may become substantially worse or cost substantially more to address if the remedial action is delayed.
- Are needed to provide for completion of the RI/FS or design of the cleanup action.

Emergency interim actions will be implemented in accordance with [WAC 173-340-430, -880](#), and Enforcement Order No. DE 22584 (EO) and Agreed Order No. DE 24355 (AO), and will be designed in a manner that will not foreclose reasonable alternatives for any final cleanup action that may be required.

Based on available data, the Washington Department of Ecology (Ecology) has determined contamination originating from Spokane International Airport (SIA) property has migrated downgradient and impacted off-property groundwater water at levels exceeding safe drinking water standards. To address impacts to commercial and residential drinking water, emergency interim actions are required pursuant to Task 4 of the EO and AO. The required areal extent of emergency interim action is depicted in Figure 1.

The work identified herein requires the Potentially Liable Persons (PLPs) — SIA, City of Spokane (City), and Spokane County (County) — to complete emergency interim actions to reduce the ongoing threat to human health and the environment. The AO PLPs (City/County) shall coordinate with the EO PLP (SIA) to develop work required of the PLPs (collectively) and, unless Ecology directs otherwise, shall present Ecology with a singular document (rather than a document from the AO PLPs and a different document from the EO PLP).

The PLPs shall coordinate with Ecology throughout the development of the work required and shall keep Ecology informed of changes to any work plan or other project plans, and of any issues or problems as they develop. The PLPs shall furnish all personnel, materials, and services necessary for, or incidental to, performing the required emergency interim actions in accordance with the attached schedule.

Deliverables prepared shall be submitted to Ecology for review and approval in electronic format as both a tracked Word document (.doc) and Adobe (.pdf) format. In accordance with the EO and the AO, work may not begin for each task before receiving written approval from Ecology.

The PLPs or their contractors shall submit all sampling data generated during these emergency interim actions to Ecology and shall enter the data into the Environmental Information Management System (EIM) in accordance with [WAC 173-340-840\(5\)](#) and Ecology's Toxics Cleanup Program [Policy 840: Data Submittal Requirements](#). Sampling data is required to be submitted to the EIM database within 60 days of receiving validated data.

The Interim Action Scope of Work (SOW) is divided into six major tasks as follows:

Task 1	Short-term Interim Action Work Plan (STIAWP)
Task 2	Implementation of the work identified in the STIAWP
Task 3	Long-term Interim Action Work Plan (LTIAWP)
Task 4	Implementation of the work identified in the LTIAWP
Task 5	Annual Interim Action Performance Reports (IAPR)
Task 6	Interim Action Progress Reports

Task 1. Short-term Interim Action Work Plan

The STIAWP shall describe the provision of clean bottled drinking water and/or installation and maintenance of point-of-use treatment (POUT) systems for residents and businesses located within the areal extent of the emergency interim action with currently known impacted drinking water (above applicable drinking water standards). The STIAWP shall also describe the plan and implementation of an initial round of area-wide residential and commercial well sampling for any private wells within the areal extent of the emergency interim action. The samples shall be analyzed by a lab-certified EPA method for PFAS at an Ecology-accredited laboratory. Bottled drinking water and/or installation and maintenance of POUT systems shall be provided to any residents or businesses found to be impacted above applicable drinking water standards during the initial round of area-wide sampling. The required areal extent of emergency interim actions is depicted in Figure 1. In accordance with the schedule, the PLPs will prepare and submit for Ecology approval an Agency Review Draft STIAWP with detail commensurate with the work to be performed. The Agency Review Draft STIAWP shall include, as appropriate:

- Description of the interim action including its purpose, general requirements, and steps to achieve the stated requirements.
- Information regarding the logistics required to implement the interim action, including public outreach procedures, a proposed schedule, and personnel roles and responsibilities.

- Compliance Monitoring Plan, Sampling Analysis Plan/Quality Assurance Project Plan (SAP/QAPP), and Health and Safety Plan, or reference to existing documents to which protocols will be adhered.
- Samples of informational materials and surveys to be distributed to residences and businesses.
- List of permits and access agreements required.

The PLPs shall submit the Agency Review Draft STIAWP to Ecology for review. After incorporating Ecology's comments, the PLPs shall submit the Final STIAWP Plan to Ecology. Once approved by Ecology, the PLPs will implement the work identified in the STIAWP according to the approved schedule.

Concurrent with the execution of work outlined in the STIAWP, Ecology will present the document for public review and comment and consider all public comments, incorporating them into the ongoing work as feasible and appropriate.

Task 2. Implementation of the Work Identified in the STIAWP

Provide clean bottled drinking water and/or install and maintain POUT systems for impacted residents and businesses and complete an initial round of area-wide PFAS sampling as described in the STIAWP.

Task 3. Long-Term Interim Action Work Plan

The LTIAWP shall describe the design, installation, and operations and maintenance of point-of-entry treatment (POET) systems for all impacted residents and businesses within the areal extent defined in Figure 1. POET systems shall be designed for, and capable of, treating the flow and volume of water utilized by the residence or business prior to known PFAS impacts. If practicable, connection of impacted residents and businesses to municipal water systems shall be implemented in lieu of POET system installations. The LTIAWP shall also describe the plan and implementation of periodic area-wide residential and commercial well sampling for any private wells within the areal extent of the emergency interim action. Periodic sampling shall occur not less than every two years for wells with no historic PFAS detections and not less than annually for wells with any ongoing PFAS detections. The samples shall be analyzed by a lab-certified EPA method for PFAS at an Ecology-accredited laboratory. Installation and maintenance of POET systems or, if practicable, connection to municipal water systems, shall be implemented for any residents or businesses found to be impacted above applicable drinking water standards during subsequent rounds of area-wide sampling. The required areal extent of emergency interim action is depicted in Figure 1. In accordance with the schedule, the PLPs will prepare and submit for Ecology approval an Agency Review Draft LTIAWP with detail commensurate with the work to be performed. The Agency Review Draft LTIAWP shall include, as appropriate:

- Description of the interim action including its purpose, general requirements, and steps to achieve the stated requirements.
- Information regarding the logistics required to implement the interim action, including a proposed schedule and personnel roles and responsibilities.
- A summary of private well characteristics and any available well logs from all parcels within the emergency interim action area.
- A summary of residential and commercial demographics, and anticipated flow and volume requirement, for all parcels that require emergency interim actions because levels exceed safe drinking water standards.
- Compliance Monitoring Plan, SAP/QAPP, and Health and Safety Plan, or reference to existing documents to which protocols will be adhered.
- Samples of informational materials and surveys to be distributed to residences and businesses.
- List of permits and access agreements required.

The PLPs will be responsible for complying with the State Environmental Policy Act (SEPA) Rules, including preparing and submitting an environmental checklist for the emergency interim action and assisting Ecology with presentations at any additional meetings or hearings that might be necessary for SEPA compliance or as part of the Public Participation Plan.

The PLPs shall submit the Agency Review Draft LTIAWP to Ecology for review. After incorporating Ecology's comments, the PLPs shall submit the Final LTIAWP Plan to Ecology. Once approved by Ecology, the PLPs will implement the work identified in the LTIAWP according to the approved schedule.

Concurrent with the execution of work outlined in the LTIAWP, Ecology will present the document and State Environmental Policy Act (SEPA) determination for public review and comment and consider all public comments, incorporating them into the ongoing work as feasible and appropriate.

Task 4. Implementation of the Work Identified in the LTIAWP
 Design, install, operate, and maintain POET systems for impacted residents and businesses as described in the LTIAWP. Alternatively, and where practicable, connect impacted residents and businesses to municipal water systems in lieu of POET system installation. Conduct area-wide residential and commercial well sampling for those on private wells within the areal extent of the emergency interim action as described in the LTIAWP.

Task 5. Annual Interim Action Performance Reports

The Annual IAPR shall contain:

1. A description of interim action-related activities that have taken place during the past year.
2. A description of interim action-related activities that are anticipated to occur during the current year.
3. A table describing the PFAS levels and drinking water status for all private wells in the emergency interim action area.
4. A table describing the current treatment system status, including installation date, operations, and maintenance information, for all private wells undergoing treatment in the emergency interim action area.
5. Confirmational monitoring data collected to ensure satisfactory removal of PFAS from drinking water treated by POUTs and POETs.
6. Figures depicting PFAS concentrations across the emergency interim action area.
7. Raw data reports for any sampling completed during the time period covered by the report, regardless of validation status.

In accordance with the schedule, an Agency Review Draft Annual IAPR will be submitted to Ecology for review and approval. After incorporating Ecology's comments on the Agency Review Draft Annual IAPR and after Ecology approval, the PLPs shall submit the Final Annual IAPR to Ecology.

Task 6. Interim Action Progress Reports

Progress reports shall be completed monthly and contain:

1. Site-related activities that have taken place during the reporting period, including progress on upcoming deliverables.
2. Detailed descriptions of any deviations from required tasks.
3. Detailed descriptions of any deviations from this SOW and schedule or from enforceable deliverables for the current reporting period and any planned deviations for the upcoming reporting period.
4. For any deviations in the schedule, a plan for maintaining compliance with the schedule.
5. All raw data (including laboratory analyses) received during the previous month together with a detailed description of the underlying samples collected.
6. A list of deliverables and activities for the upcoming reporting period.

Schedule for Deliverables and Actions

The schedule for deliverables and actions described in the Scope of Work is presented below. References to days in the schedule are calendar days. If the date for submission of any item or notification required by this Schedule of Deliverables occurs on a weekend or 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 PLPs 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.

Task	Deliverables or Actions	Completion Times
1	PLPs to submit Draft STIAWP	14 days after PLPs receive Ecology's written notice that an Emergency Interim Action is required
1	PLPs to submit Final STIAWP	7 days after PLPs receive Ecology's comments on Draft STIAWP
2	PLPs to begin work identified in Final STIAWP	7 days after PLPs receive Ecology's approval of Final STIAWP
2	PLPs to complete work identified in Final STIAWP	As required by the schedule in STIAWP
3	PLPs to submit Draft LTIAWP	90 days after PLPs receive Ecology's written notice that an Emergency Interim Action is required
3	PLPs to submit Final LTIAWP	30 days after PLPs receive Ecology's comments on Draft LTIAWP
4	PLPs to begin work identified in Final LTIAWP	30 days after PLPs receive Ecology's approval of Final STIAWP
4	PLPs to complete work identified in Final LTIAWP	As required by schedule in LTIAWP

Task	Deliverables or Actions	Completion Times
5	PLPs to submit Draft Annual IAPR	By March 15 of the subsequent year
5	PLPs to submit Final Annual IAPR	30 days after PLPs receive Ecology's comments on Draft IAPR
6	Interim Action Progress Reports	Monthly, on the 10th day of each following month

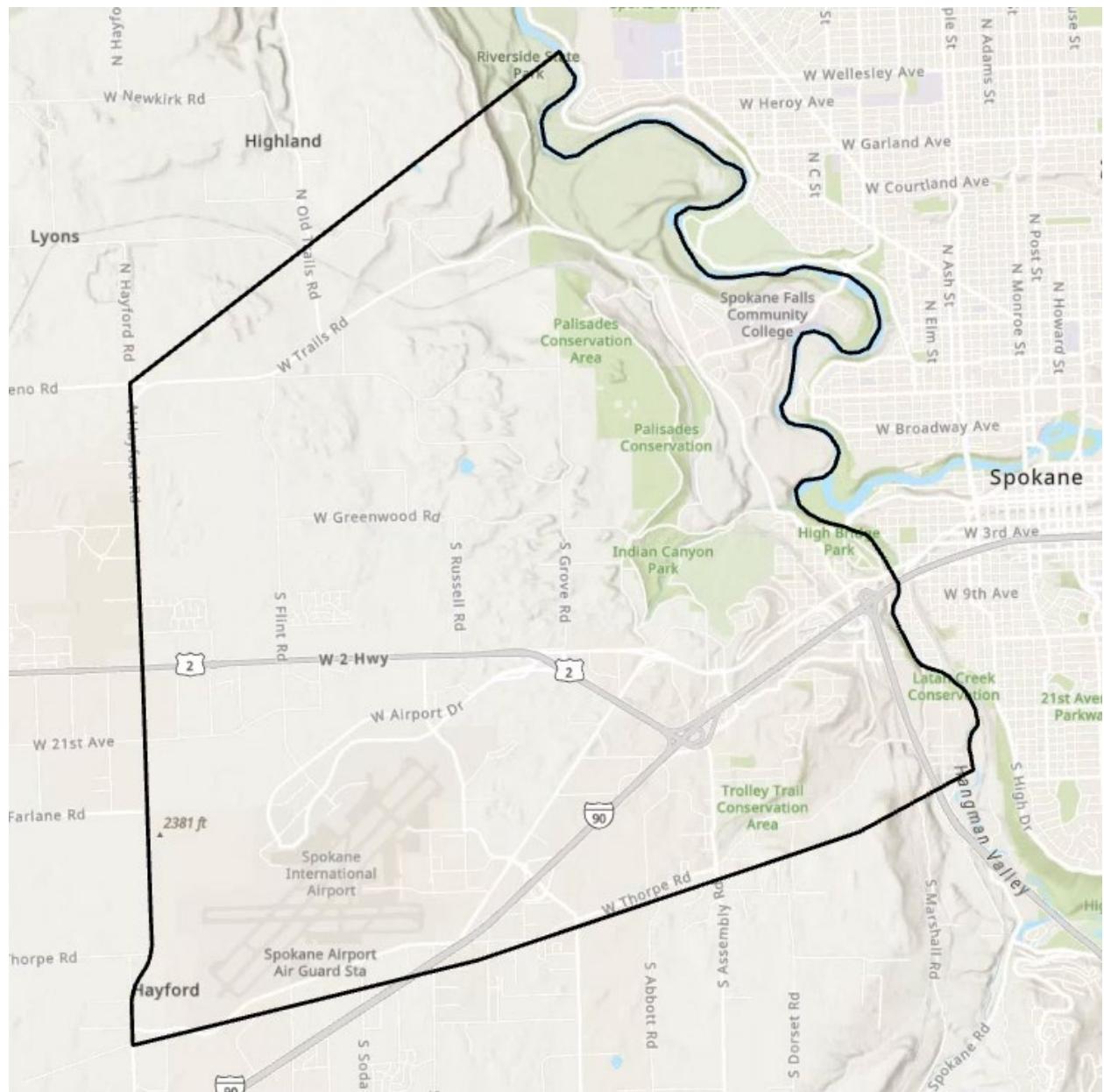


Figure 1. Required areal extent of emergency interim actions