

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

## **SCOPE OF WORK**

### **PURPOSE**

The work under this Agreed Order (AO) involves conducting a Remedial Investigation /Feasibility Study (RI/FS), conducting Interim Actions, and preparing a preliminary Draft Cleanup Action Plan (DCAP). The purpose of the RI/FS is to provide sufficient data, analysis, and evaluations to enable Ecology to select a cleanup alternative for the Site.

The Boeing Company (Boeing) shall coordinate with Ecology throughout the RI/FS, Interim Action, and preliminary DCAP, 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 Scope of Work (SOW) is divided into six major tasks as follows:

- Task 1. RI Work Plan
- Task 2. Remedial Investigation
- Task 3. Interim Actions
- Task 4. Feasibility Study
- Task 5. SEPA Compliance
- Task 6. Preliminary Draft Cleanup Action Plan

### **TASK 1. RI WORK PLAN**

Boeing shall prepare a RI Work Plan. The RI Work Plan shall include an overall description and schedule of all RI activities. The RI Work Plan shall clearly describe the project management strategy for implementing and reporting on RI activities. The responsibility and authority of all organizations and key personnel involved in conducting the RI will be outlined.

A RI Planning Meeting will be held prior to submittal of the RI Work Plan. The purpose of the RI Planning Meeting is to review requirements for the RI Work Plan, RI field work, and discuss the preliminary Conceptual Site Model, and identify project data needs and interim actions.

The RI Work Plan shall describe general facility information; site history and conditions, including previous operations; past field investigations, including any data collection and analysis of soils, air, groundwater, surface water, stormwater and catch basin solids; summary of past independent remedial actions, and cleanup actions in progress under a Voluntary Cleanup Program (VCP); a conceptual site model showing contaminants, migration pathways in all environmental media, and potential receptors; geology and groundwater system characteristics; past, current, and future land use; identification of

natural resources and ecological receptors; hazardous substances and their sources, etc., in compliance with WAC 173-340-350.

As part of the project background, existing environmental data on site soil, groundwater and air will be compiled and evaluated for data gaps. The data gaps will be used as the basis for conducting additional site investigations, if necessary. The RI Work Plan will also identify specific data collection procedures in a Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP) as part of the RI Work Plan in compliance with WAC 173-340-820 for defining the nature and extent of contamination. Boeing will also submit a copy of the Health and Safety Plan (HASP) for the project.

The SAP identifies the proposed number and location of all environmental samples and methods, including soil borings, groundwater monitoring wells, soil, groundwater and air, and approximate depths for soil and groundwater samples. The SAP will describe the sampling objectives, the rationale for the sampling approach (based upon the identified data gaps), and plans for data use, and shall provide a detailed description of sampling tasks. The SAP shall describe specifications for sample identifiers; sampling equipment; the type, number, and location of samples to be collected; the analyses to be performed; descriptions of sampling equipment and methods to be used; sample documentation; sample containers, collection and handling; data and records management; and schedule.

The Quality Assurance Project Plan (QAPP) will be prepared in accordance with the Guidance for Preparation of Quality Assurance Project Plans, EPA Region 10, Quality Data Management Program, QA/R-5 and requirements of the EPA Contract Laboratory Program. The QAPP will also follow Ecology's Guidelines for Preparing Quality Assurance Project Plans for Environmental Studies (Revised December 2016) <sup>1</sup> Laboratories must meet the accreditation standards established in WAC 173-50. Data quality objectives will reflect the criteria or threshold values used for the source control evaluation.

The SAP, including the QAPP, will be submitted to Ecology for review and approval. Work may not begin without written approval from Ecology. The plan shall provide seven (7) day notice to Ecology prior to beginning sampling. Ecology may obtain split samples.

Boeing or their contractors shall submit all new sampling data generated under this SAP and any other recently collected data to Ecology. Electronic data shall be submitted through Ecology's Environmental Information Management System (EIM) in accordance with WAC 173-340-840(5) and Ecology's Toxics Cleanup Program Policy 840: Data Submittal Requirements.

The RI Work Plan tasks and subtasks will include the following:

- Sampling and analysis, as appropriate, of soil, groundwater, soil vapor, seeps and air;

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<sup>1</sup> Found at <http://www.ecy.wa.gov/biblio/0403030.html>

- Evaluate the potential to contaminate or recontaminate sediments, including analysis of the following pathways:
  - Groundwater discharges and seeps
  - Soil erosion

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

Boeing shall submit two (2) copies of the Agency Review Draft RI Work Plan, including one electronic copy each in Word (.doc) and Adobe (.pdf) formats, to Ecology for review and comment. After incorporating Ecology's comments on the Agency Review Draft Work Plan and after Ecology approval, Boeing shall submit three (3) copies of the Final Work Plan, including one electronic copy each in Word (.doc) and Adobe (.pdf) formats, to Ecology.

## **TASK 2. REMEDIAL INVESTIGATION**

Boeing shall conduct an RI that meets the requirements of WAC 173-340-350(7) according to the Work Plan as approved by Ecology. The RI will determine the nature and extent of contamination exceeding preliminary Model Toxics Control Act (MTCA) cleanup levels, and other regulatory requirements. The RI must provide sufficient data and information to define the nature and extent of contamination.

Field sampling and analysis will be completed in general accordance with the SAP and QAPP. Deviation(s) from the approved SAP and QAPP must be communicated to Ecology immediately and documented as required by Ecology.

Monthly progress reports shall include new site data and information that became available during the previous month. Laboratory analysis data shall also be provided in electronic format when it has been validated. Raw laboratory data will be provided to Ecology upon request.

Prior to submittal of the Agency Review Draft RI Report, a RI Pre-Report Check-In will be held. During the RI Pre-Report Check-In, Ecology and Boeing will review available data and an updated conceptual site model and discuss the content and organization of the Draft RI Report.

Boeing shall compile the results of the Site investigation into an Agency Review Draft RI Report. Boeing shall submit two (2) copies of the Agency Review Draft RI Report including one electronic copy each in Word (.doc) and Adobe (.pdf) formats, to Ecology for review and comment.

After incorporating Ecology's comments on the Agency Review Draft RI Report, Boeing shall submit three (3) copies of a Public Review Draft RI Report including one electronic copy each in Word (.doc) and Adobe (.pdf) formats, to Ecology for distribution and public comment. Electronic survey data for monitoring locations, electronic lab data, and GIS maps of contaminant distribution shall also be provided for both the Agency Review Draft RI Report and Public Review Draft RI Reports either in the report or as attachments. The RI Report will not be considered Final until after a public review and comment period.

If the data collected during this investigation is insufficient to define the nature and extent of contamination and/or to select a cleanup action plan, an additional phase of investigation shall be conducted to define the extent of contamination.

### **TASK 3. INTERIM ACTIONS**

Boeing shall implement the interim action in accordance with the Interim Action Work Plan (Exhibit D).

### **TASK 4. FEASIBILITY STUDY**

Boeing shall use the information obtained in the RI to prepare an Agency Review Draft Feasibility Study (FS) that meets the applicable requirements of WAC 173-340-350(8) according to the Schedule in this exhibit. The Agency Review Draft FS will evaluate remedial alternatives for site cleanup, consistent with MTCA to ensure protection of human health and the environment by eliminating, reducing, or otherwise controlling risk posed through each exposure pathway and migration route.

Prior to beginning the FS, a FS Planning Meeting will be held to discuss ARARs, potential remedial alternatives, points of compliance and other important issues.

The Agency Review Draft FS will provide a detailed analysis of each remedial alternative according to the applicable requirements of WAC 173-340-350, MTCA Remedial Investigation and Feasibility Study. The remedial alternatives will be evaluated for compliance with the applicable requirements of WAC 173-340-360, Selection of Cleanup Actions, including a detailed evaluation of remedial alternatives relative to the following criteria:

- Compliance with Cleanup Standards and Applicable Laws
- Protection of Human Health
- Protection of the Environment
- Provision for a Reasonable Restoration Time Frame
- Use of Permanent Solutions to the Maximum Extent Practicable
- The Degree to which Recycling, Reuse, and Waste Minimization are Employed
- Short-term Effectiveness
- Long-Term Effectiveness

- Implementability
- Provision for Compliance Monitoring
- Cost-Effectiveness
- Prospective Community Acceptance

The remedial alternative that is judged to best satisfy the evaluation criteria will be identified. Justification for the selection will be provided, and the recommended remedial alternative further developed, in the FS Report.

Boeing shall submit two (2) copies of the Agency Review Draft FS including one electronic copy in Word (.doc) and Adobe (.pdf) formats, to Ecology for review. After addressing Ecology's comments on the Agency Review Draft FS, Boeing shall submit three (3) copies of the Public Review Draft FS including one electronic copy each in Word (.doc) and Adobe (.pdf) formats, to Ecology for distribution and public comment. The FS will not be considered Final until after a public review and comment period.

#### **TASK 5. SEPA COMPLIANCE**

As applicable, Boeing shall 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), Boeing shall be responsible for the preparation of Draft and final environmental impact statements. Boeing shall 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 6. PRELIMINARY DRAFT CLEANUP ACTION PLAN**

Upon Ecology approval of the Public Review Draft Remedial Investigation Report and Public Review Draft Feasibility Study, a Cleanup Action Plan Meeting will be held regarding the Cleanup Action Plan. The Cleanup Action Plan Meeting will be used to review plans for developing the Agency Review preliminary Draft Cleanup Action Plan (DCAP).

Boeing shall prepare an Agency Review preliminary DCAP in accordance with WAC 173-340-380 that provides a proposed remedial action to address the contamination present on the Site. The preliminary DCAP shall include a general description of the proposed remedial actions, cleanup standards developed from the RI/FS and rationale regarding their selection, a schedule for implementation, description of any institutional controls proposed, and a summary of applicable local, state, and federal laws pertinent to the proposed cleanup actions.

Boeing will submit an Agency Review preliminary DCAP for Ecology's review and approval. The Agency Review preliminary DCAP will include, but not be limited to, the information listed under WAC 173-340-380. Boeing shall submit two (2) copies of the Agency Review preliminary DCAP including one electronic copy each in Word (.doc) and Adobe (.pdf) formats, to Ecology for review and approval.

After receiving Ecology's comments on the Agency Review preliminary DCAP, if any, Boeing shall revise the preliminary DCAP to address Ecology's comments and submit five (5) copies of the Public Review DCAP including one electronic copy each in Word (.doc) and Adobe (.pdf) formats.

## **SCHEDULE OF DELIVERABLES**

The schedule for deliverables described in the Agreed 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 Boeing received such notification, comments or approval by certified mail, return receipt requested, unless otherwise noted below. Where triggered by Ecology receipt of a deliverable, the starting date for the period shown is the date Ecology receives the deliverable by certified mail, return receipt requested, or the date of Ecology signature on a hand-delivery form.

<b>RI/FS Deliverables</b>	<b>Completion Times</b>
Agency Review Draft Remedial Investigation (RI) Work Plan	60 days after the Agreed Order effective date
Final RI Work Plan	30 days after receipt of Ecology comments
Completion of RI Field Work	12 months after Ecology approval of the Final RI Work Plan
Agency Review Draft RI Report	90 days after completion of RI field work
Public Review Draft RI Report	30 days after receipt of Ecology comments on Agency Review Draft RI Report
Final RI Report*	30 days after the end of public comment period
Agency Review Draft Feasibility Study (FS)	90 days after Ecology approval of Public Review Draft RI Report
Public Review Draft FS	30 days after receipt of Ecology comments on the Agency Review Draft FS
Final FS Report*	30 days after the end of public comment period
Agency Review preliminary Draft Cleanup Action Plan (DCAP)	90 days after Ecology approval of the Public Review Draft FS Report
Public Review preliminary DCAP	30 days after receipt of Ecology comments on the Agency Review preliminary DCAP

\* Public notice for RI and FS reports may be combined.