

## **ATTACHMENT E**

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### INTERIM MEASURES

#### Purpose

The purpose of Interim Measures are to implement corrective actions during the term of this Permit to control, abate or remove any known on-site or off-site contamination, and/or prevent the migration of contamination on, or beyond, the Facility boundary and to the extent practicable, said interim measures are to be consistent with, and integrated into any long-term remediation at the Facility.

#### Scope

##### I. Interim Measures Workplan

The Permittee shall prepare an Interim Measures Workplan that includes the development of several plans which shall be prepared concurrently. Upon EPA approval, the Permittee shall implement the Workplan according to the schedules contained therein.

##### A. Interim Measures Project Management Plan

The Interim Measures Project Management Plan ("IMPMP") shall document the overall management approach to the Interim Measures. The IMPMP shall include, but not be limited to:

1. Background information including a discussion of historical facility operations, the current conditions at the facility, including any interim measures which have, or are being implemented at the facility, pertinent geology, and the known nature and extent of contamination.
2. A discussion of Interim Measures objectives, the technical approach to meet those objectives, and an explanation of how the interim measures will control, abate or eliminate releases and, to the extent possible, be consistent and integrated with any long-term solution at the facility.
3. A description of the qualifications of personnel directing or performing the Interim Measures, including contractor and subcontractor personnel.
4. A project schedule identifying dates for the anticipated completion of the project and the submission of all documents referenced in this Attachment, including, but not limited to an Interim Measures Design Program containing Design Plans and Specifications, an Operations and Maintenance Plan, a Sampling and Analysis Plan (if necessary), progress reporting, and an Interim Measures Implementation Report.

##### B. Community Relations Plan

The Permittee shall prepare a fact sheet describing the scope and objectives of the Interim Measures to be performed under the Interim Measures Workplan as approved by EPA. The Permittee shall mail this fact sheet to all persons on the Facility mailing list compiled under 40 C.F.R. § 124.10 (c) (1) (ix) and to the appropriate units of State and local governments at least ten (10) business days prior to the start of field activities.

C. Health and Safety Plan

The Permittee shall submit a Health and Safety Plan in accordance with Attachment F\* to this Permit. If EPA deems it appropriate, Permittee may reference or amend a previous Health and Safety Plan submitted pursuant to this Permit. \* (See RFAAP Master Workplan, Draft Final, April 1998/August 2003)

II. Interim Measures Design Program

A. Design Documentation and Specifications. The Permittee shall submit to EPA design documentation and specifications which include, but are not limited to:

1. The design strategy and the design basis, including measures of compliance with all applicable or relevant environmental and public health standards;
2. The technical factors of importance, including but not limited to materials, equipment and specifications;
3. The assumptions made and detailed justification of these assumptions;
4. The possible sources of error, references to possible operation and maintenance problems and anticipated remedies; and
5. Detailed drawings including: facility layout, utility locations, engineering controls which aid in the safe operation of the IM, sample calculations, derivations of equations essential to understanding the report and results of laboratory or field tests.

B. Operations and Maintenance Plan

Permittee shall prepare an Operation and Maintenance Plan to cover both implementation and long-term maintenance of the Interim Measure(s). The plan shall be composed of:

1. Description of the equipment and its normal operation and maintenance (O&M), including a schedule showing frequency of each O&M task;
2. Description of routine monitoring and laboratory testing, the required

QA/QC, and a schedule of monitoring frequency and equipment replacement.

3. Records and reporting mechanisms required, including daily operating logs, laboratory records, mechanism for reporting equipment breakdown, failure and emergencies related to the implementation of the interim measure, personnel and maintenance/records and monthly/annual reports to Federal/state agencies.

C. Sampling and Analysis Plan

If any sampling and analysis is required to implement the interim measures, Permittee must include in the Interim Measure Workplan a Data Collection Quality Assurance Plan and a Data Management Plan. These two plans shall be submitted in accordance with the requirements of Attachment F.\* If EPA has previously approved a Sampling and Analysis Plan pursuant to a RFI or previous IM and EPA deems it appropriate, Permittee may reference or amend the relevant portions of the approved Plan. The Sampling and Analysis Plan shall describe the methods and frequency for collecting and analyzing samples for monitoring the effectiveness and efficiency of the ongoing interim Measures. At a minimum it shall describe the number of samples collected, including QA/QC samples, the location of the samples collected, the method of collection, frequency of sampling activities, decontamination procedures, and a constituent analysis list. \*(See RFAAP Master Workplan, Draft Final, April 1998, August 2003)

III. Reports

A. Interim Measures Workplan

Permittee shall submit an Interim Measures Workplan as described in this Attachment

B. Progress

Permittee shall submit to EPA IM Progress Reports in accordance with an approved schedule described in the IMPMP of Section I.A. of this Attachment. The progress reports shall contain:

1. A description and estimate of the percentage of the interim measures completed;
2. Summaries of all findings;
3. Summaries of all changes made in the interim measures during the reporting period;
4. Summaries of all contacts with representative of the local community,

- public interest groups, or state government during the reporting period;
- 5. Summaries of all problems or potential problems encountered during the reporting period;
- 6. Actions being taken to rectify problems;
- 7. Changes in personnel during the reporting period;
- 8. Projected work for the next reporting period; and
- 9. Copies of daily reports, inspection reports, laboratory/monitoring data, etc.

C. Interim Measures Implementation Report

At the "completion" of the construction of the project, Permittee shall finalize the Interim Measures Workplan, and submit for EPA's approval a Draft Interim Measures Implementation Report ("IMIR") in accordance with the schedule described in Section I.A.4 of this Attachment. The IMIR shall document that the project is consistent with the design specifications and that the interim measures are performing adequately. The IMIR shall include, but not be limited to:

- 1. Synopsis of the interim measures and certification of the design and construction;
- 2. Explanation of any modifications to the plans and why these were necessary for the project;
- 3. Listing of the criteria, established before the interim measures were initiated, for judging the functioning of the interim measures and also for explaining any modification to these criteria;
- 4. Results of facility monitoring, indicating that the interim measures will meet or exceed the performance criteria; and
- 5. Summary of the operation and maintenance (including monitoring) to be undertaken at the facility.

In addition to the above information, the IMIR shall include the inspection summary reports, inspection data sheets, problem identification and corrective reporting data sheets, design engineers' acceptance reports, deviations from design and material specifications (with justifying documentation), and as-built drawings.

- 6. The Permittee shall respond to any comments received from EPA on the draft IMIR submission.