

97. No action or decision by EPA pursuant to this Order shall give rise to any right to judicial review, except as set forth in Section 113(h) of CERCLA, 42 U.S.C. § 9613(h).

XXIII. CONTRIBUTION PROTECTION

98. The Parties agree that Respondent is entitled, as of the Effective Date, to protection from contribution actions or claims as provided by Sections 113(f)(2) and 122(h)(4) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(h)(4), for “matters addressed” in this Order. The “matters addressed” in this Order are the Work and Future Response Costs. Nothing in this Order precludes the United States or Respondent from asserting any claims, causes of action, or demands against any persons not parties to this Order for indemnification, contribution, or cost recovery.

XXIV. INDEMNIFICATION

99. Respondent shall indemnify, save, and hold harmless the United States, its officials, agents, contractors, subcontractors, employees, and representatives from any and all claims or causes of action arising from, or on account of, negligent or other wrongful acts or omissions of Respondent, its officers, directors, employees, agents, contractors, or subcontractors, in carrying out actions pursuant to this Order. In addition, Respondent agrees to pay the United States all costs incurred by the United States, including, but not limited to, attorneys fees and other expenses of litigation and settlement, arising from, or on account of, claims made against the United States based on negligent or other wrongful acts or omissions of Respondent, its officers, directors, employees, agents, contractors, subcontractors, and any persons acting on their behalf or under their control, in carrying out activities pursuant to this Order. The United States shall not be held out as a party to any contract entered into, by, or on behalf of Respondent in carrying out activities pursuant to this Order. Neither Respondent nor any such contractor shall be considered an agent of the United States.

100. The United States shall give Respondent notice of any claim for which the United States plans to seek indemnification pursuant to this Section and shall consult with Respondent prior to settling such claim.

101. Respondent waives all claims against the United States for damages or reimbursement or for set-off of any payments made, or to be made, to the United States, arising from, or on account of, any contract, agreement, or arrangement between Respondent and any person for performance of Work on, or relating to, the Site, including, but not limited to, claims on account of construction delays. In addition, Respondent shall indemnify and hold harmless the United States with respect to any and all claims for damages or reimbursement arising from, or on account of, any contract, agreement, or arrangement between Respondent and any person for performance of Work on, or relating to, the Site.

XXV. INSURANCE

102. At least 30 days prior to commencing any on-Site Work under this Order, Respondent shall secure and shall maintain for the duration of this Order comprehensive general liability insurance and automobile insurance with limits of one million dollars (\$1,000,000),

combined single limit, naming the EPA as an additional insured. Within the same period, Respondent shall provide EPA with certificates of such insurance and a copy of each insurance policy. Respondent shall submit such certificates and copies of policies each year on the anniversary of the Effective Date. In addition, for the duration of the Order, Respondent shall satisfy, or shall ensure that their contractors or subcontractors satisfy, all applicable laws and regulations regarding the provision of worker's compensation insurance for all persons performing the Work on behalf of Respondent in furtherance of this Order. If Respondent demonstrates by evidence satisfactory to EPA that any contractor or subcontractor maintains insurance equivalent to that described above, or insurance covering some or all of the same risks but in an equal or lesser amount, then Respondent need provide only that portion of the insurance described above that is not maintained by such contractor or subcontractor.

XXVI. FINANCIAL ASSURANCE

103. Within 30 days of the Effective Date, Respondent shall establish and maintain financial security for the benefit of EPA in the amount of \$ 2,571,000 in one or more of the following forms, to secure the full and final completion of Work by Respondent:

- a. a surety bond unconditionally guaranteeing payment and/or performance of the Work;
- b. one or more irrevocable letters of credit, payable to or at the direction of EPA, issued by financial institution(s) acceptable in all respects to EPA equaling the total estimated cost of the Work;
- c. a trust fund administered by a trustee acceptable in all respects to EPA;
- d. a policy of insurance issued by an insurance carrier acceptable in all respects to EPA, which ensures the payment and/or performance of the Work;
- e. a corporate guarantee to perform the Work provided by one or more parent corporations or subsidiaries of Respondent, or by one or more unrelated corporations that have a substantial business relationship with at least one of Respondent; including a demonstration that any such company satisfies the financial test requirements of 40 C.F.R. Part 264.143(f); and/or
- f. a corporate guarantee to perform the Work by one or more of Respondent, including a demonstration that any such Respondent satisfies the requirements of 40 C.F.R. Part 264.143(f).

104. Any and all financial assurance instruments provided pursuant to this Section shall be in form and substance satisfactory to EPA, determined in EPA's sole discretion. In the event that EPA determines at any time that the financial assurances provided pursuant to this Section (including, without limitation, the instrument(s) evidencing such assurances) are inadequate, Respondent shall, within 30 days of receipt of notice of EPA's determination, obtain and present to EPA for approval one of the other forms of financial assurance listed in Paragraph 103, above. In addition, if at any time EPA notifies Respondent that the anticipated cost of completing the Work has increased, then, within 30 days of such notification, Respondent shall obtain and present to EPA for approval a revised form of financial assurance (otherwise acceptable under

this Section) that reflects such cost increase. Respondent's inability to demonstrate financial ability to complete the Work shall in no way excuse performance of any activities required under this Order.

105. If Respondent seeks to ensure completion of the Work through a guarantee pursuant to Subparagraph 101(e) or 101(f) of this Order, Respondent shall: (i) demonstrate to EPA's satisfaction that the guarantor satisfies the requirements of 40 C.F.R. Part 264.143(f); and (ii) resubmit sworn statements conveying the information required by 40 C.F.R. Part 264.143(f) annually, on the anniversary of the Effective Date, to EPA. For the purposes of this Order, wherever 40 C.F.R. Part 264.143(f) references "sum of current closure and post-closure costs estimates and the current plugging and abandonment costs estimates," the current cost estimate of \$2,571,000 for the Work at the Site shall be used in relevant financial test calculations.

106. If, after the Effective Date, Respondent can show that the estimated cost to complete the remaining Work has diminished below the amount set forth in Paragraph 101 of this Section, Respondent may, on any anniversary date of the Effective Date, or at any other time agreed to by the Parties, reduce the amount of the financial security provided under this Section to the estimated cost of the remaining Work to be performed. Respondent shall submit a proposal for such reduction to EPA, in accordance with the requirements of this Section, and may reduce the amount of the security after receiving written approval from EPA. In the event of a dispute, Respondent may change the form of financial assurance required hereunder only in accordance with a final decision resolving such dispute pursuant to Section XVI (Dispute Resolution).

107. Respondent may change the form of financial assurance provided under this Section at any time, upon notice to and prior written approval by EPA, provided that EPA determines that the new form of assurance meets the requirements of this Section. In the event of a dispute, Respondent may change the form of financial assurance required hereunder only in accordance with a final decision resolving such dispute pursuant to Section XVI (Dispute Resolution).

XXVII. INTEGRATION/APPENDICES

108. This Order, its appendices, and any deliverables, technical memoranda, specifications, schedules, documents, plans, reports (other than progress reports), etc. that will be developed pursuant to this Order and become incorporated into, and enforceable under, this Order constitute the final, complete, and exclusive agreement and understanding among the Parties with respect to the settlement embodied in this Order. The parties acknowledge that there are no representations, agreements, or understandings relating to the settlement other than those expressly contained in this Order.

109. In the event of a conflict between any provision of this Order and the provisions of any document attached to this Order or submitted or approved pursuant to this Order, the provisions of this Order shall control.

110. The following documents are attached to and incorporated into this Order:

"Appendix A" is the SOW.

"Appendix B" is the ROD.

XXVIII. EFFECTIVE DATE AND SUBSEQUENT MODIFICATION

111. This Order shall be effective 10 days after the Order is signed by the Regional Administrator or his/her designee.

112. This Order may be amended by mutual agreement of EPA and Respondent. Amendments shall be in writing and shall be effective when signed by EPA. EPA Project Coordinators do not have the authority to sign amendments to the Order.

113. No informal advice, guidance, suggestion, or comment by the EPA Project Coordinator or other EPA representatives regarding reports, plans, specifications, schedules, or any other writing submitted by Respondent shall relieve Respondent of its obligation to obtain any formal approval required by this Order, or to comply with all requirements of this Order, unless it is formally modified.

XXIX. NOTICE OF COMPLETION OF WORK

114. When EPA determines, after EPA's review of the Final Report, that all Work has been fully performed in accordance with the other requirements of this Order, with the exception of any continuing obligations required by this Order, including payment of Future Response Costs and record retention, EPA will provide written notice to Respondent. If EPA determines that any such Work has not been completed in accordance with this Order, EPA will notify Respondent, provide a list of the deficiencies, and require that Respondent modify the Work Plan if appropriate to correct such deficiencies. Respondent shall implement the modified and approved Work Plan and shall submit the required deliverables. Failure by Respondent to implement the approved modified Work Plan shall be a violation of this Order.

Agreed this 6 day of May, 2013.

For Respondent Wisconsin Public Service Corporation:

By: Connie Jannigah

Title: Director - Environmental Services

In the Matter of WPSC Stevens Point MGP Site

It is so ORDERED AND AGREED this 14 day of MAY,
2013.

BY: Richard C. Karl

DATE: 5-14-13

Richard C. Karl, Director
Superfund Division
Region 5
United States Environmental Protection Agency

EFFECTIVE DATE: 5/24/2013

**APPENDIX A
STATEMENT OF WORK
FOR THE REMEDIAL DESIGN AT THE WPSC STEVENS POINT FORMER
MANUFACTURED GAS PLANT SUPERFUND ALTERNATIVE SITE,
PORTAGE COUNTY, WISCONSIN**

Table of Contents

I.	PURPOSE.....	1
II.	DESCRIPTION OF THE REMEDIAL ACTION.....	1
III.	SCOPE OF REMEDIAL DESIGN.....	1
	A. Remedial Design Workplan.....	1
	B. Preliminary Remedial Design.....	2
	C. Pre-final Design/Final Design.....	3
IV.	SUPPORTING PLANS FOR REMEDIAL DESIGN.....	4
	A. Sediment Response Plan.....	4
	B. Soil Cover Monitoring and Maintenance Plan.....	5
	C. Natural Attenuation Implementation and Monitoring Plan.....	5
	D. Quality Assurance Project Plan.....	12
	E. Health and Safety Plan.....	13
	F. Contingency Plan [Stand Alone or in HSP].....	14
	G. Field Sampling Plan.....	14
	H. Construction Quality Assurance Plan.....	14
	I. Institutional Control Implementation and Assurance Plan.....	15
	J. Operation and Maintenance Plan.....	17
V.	SUMMARY OF MAJOR DELIVERABLES/SCHEDULE.....	17
VI.	REGULATIONS AND GUIDANCE DOCUMENTS.....	18

I. PURPOSE

This Statement of Work (SOW) sets forth requirements for conducting the Remedial Design (RD) as set forth in the Record of Decision (ROD) for the WPSC Stevens Point Former Manufactured Gas Plant Superfund Alternative Site (Stevens Point Site, Site), which was signed by the Superfund Division Director, U.S. EPA (EPA) Region 5 on September 25, 2012. Respondent, Wisconsin Public Service Corporation, shall design the remedial action at the Stevens Point Site in accordance with the ROD, the SOW, the approved Remedial Design Workplan (Workplan), EPA Superfund Remedial Design Guidance, and any other approved plans and guidance provided by EPA. A partial list of guidance documents is provided in Attachment 1.

II. DESCRIPTION OF THE REMEDIAL ACTION

Respondent shall design the remedial action (RA) to meet the performance standards and specifications set forth in the ROD and this SOW. Performance standards shall include cleanup standards, standards of control, quality criteria, and other substantive requirements, criteria, or limitations, including all Applicable or Relevant and Appropriate Requirements (ARARs), set forth in the ROD, SOW, and/or the AOC. Compliance shall be demonstrated by satisfying these performance standards. The components of the RD are described below.

- Institutional Controls (ICs) will be placed on those areas of the Site with contaminated subsurface soil to restrict the properties to non-residential use and prevent exposure to the contaminated soil, and the existing clean soil cover and pavement will be maintained. Designing this portion of the remedy will include preparing an Institutional Control Implementation and Assurance Plan and a Soil Cover Maintenance and Monitoring Plan.
- Groundwater will achieve clean-up levels for all COCs through monitored natural attenuation (MNA) and ICs will prohibit consumption of Site-contaminated groundwater. Designing this component of the remedy will include developing a Natural Attenuation Monitoring Plan (NAIMP) and a Groundwater Contingency Plan.
- Contaminated sediment in an approximately 0.4-acre area that has probable toxic effects on benthic organisms in the Wisconsin River will be dredged. Contaminated sediment in the Pfißner Pioneer Park pond will be covered with clean sand with an activated carbon additive. Designing this portion of the remedy will include preparing a Sediment Response Plan for this work.

III. SCOPE OF REMEDIAL DESIGN

The RD shall consist of the following three major tasks or phases.

A. Remedial Design Workplan

Within sixty (60) days after EPA issues a notice of authorization to proceed with RD, Respondent shall submit a draft RD Workplan to EPA and WDNR for review and comment. The content of the Workplan shall include:

- An overall management strategy for performing the RD and RA at the Site in accordance with the ROD and the SOW;
- A schedule for fulfilling the RD objectives and for completing the RD;
- A schedule for the planned work for delivery or execution of the milestones stated in the AOC and the SOW;
- An identification of the responsibility and authority of all key personnel and organizations involved in the implementation of the RD; and
- A description of the qualifications of key personnel directing the RD including contractor personnel.

Following comments by EPA, Respondent shall prepare and submit a final RD Workplan which fully and satisfactorily addresses EPA comments on the draft RD Workplan. The final RD Workplan shall include a response to comments explaining how each of EPA's comments on the draft RD Workplan was addressed in the final RD Workplan. Respondent shall submit the final RD Workplan to EPA and WDNR within thirty (30) days of the receipt to EPA's comments on the draft RD Workplan. Respondent shall submit any subsequent revisions to the RD Workplan, if required, to EPA and WDNR within a reasonable period of time not to exceed thirty (30) days after receipt of any additional comments on the final RD Workplan.

B. Preliminary Remedial Design

1. Required Content

Respondent shall submit the Preliminary Design within forty-five (45) days of EPA approval of RD Workplan when the design effort is approximately 30 percent complete. The Preliminary Design submittal shall include or discuss, at a minimum, the following:

- Design assumptions and parameters, including design restrictions, and process performance criteria;
- Proposed cleanup verification methods, including compliance with ARARs;
- Outline of required specifications;
- Proposed siting/locations of processes/construction activity;
- Expected long-term monitoring and operation requirements;

- Real estate, easement, and permit requirements;
- Preliminary construction schedule, including contracting strategy.

2. Media-Specific Plans

The following draft plans shall be submitted as part of the draft Preliminary Remedial Design submittal:

- Draft Sediment Response Plan
- Draft Soil Cover Monitoring and Maintenance Plan
- Draft Natural Attenuation Implementation and Monitoring Plan

All plans and specifications shall be developed in accordance with EPA's "Superfund Remedial Design and Remedial Action Guidance" (OSWER Directive No. 9355.0-4A), and shall demonstrate that the RA shall meet all objectives of the ROD, the AOC, and this SOW, including all performance standards.

3. Additional Plans

The following draft plans shall be submitted on a schedule described in the RD Workplan:

- Draft Quality Assurance Project Plan
- Draft Health and Safety Plan
- Draft Contingency Plan (if stand-alone)
- Draft Field Sampling Plan
- Draft Construction Quality Assurance Plan
- Draft Institutional Control Implementation and Assurance Plan
- Draft O&M Plan

C. Pre-final Design/Final Design

Respondent shall submit the Pre-final Design within thirty (60) days of receipt of EPA comments on the Preliminary Design when the design effort is 95 percent complete. If any modifications to the design are necessary, Respondent shall submit the Final Design within thirty (30) days of receipt of EPA comments on the Pre-final Design. The Pre-final Design shall fully address all comments made to the preceding design submittal. The Final Design shall fully address all comments made to the Pre-final Design and shall include reproducible drawings and

specifications suitable for bid advertisement. The Pre-final Design shall serve as the Final Design if EPA has no further comments and issues the notice to proceed.

The Pre-final and Final Design submittals shall include the following:

- Final Sediment Response Plan
- Final Soil Cover Monitoring and Maintenance Plan
- Final Natural Attenuation Implementation and Monitoring Plan
- Final Quality Assurance Project Plan
- Final Health and Safety Plan
- Final Contingency Plan (if stand-alone)
- Final Field Sampling Plan
- Final Construction Quality Assurance Plan
- Final Institutional Control Implementation and Assurance Plan
- Final O&M Plan
- Capital and O&M Cost Estimate. This cost estimate shall refine the cost estimate provided in the feasibility study to reflect the detail presented in the Final Design.

IV. SUPPORTING PLANS FOR REMEDIAL DESIGN

This section describes the required contents of each of the supporting plans. The documents listed in this section shall be prepared by Respondent and submitted in accordance with the schedule in Section V of this SOW. All plans shall be submitted to EPA and WDNR, and are subject to EPA approval, in consultation with WDNR. For all revised submittals under this Section, Respondent shall identify all changes to the submittal that were not a direct result of addressing agency comments and shall explain the reasoning for said change.

A. Sediment Response Plan

Respondent shall prepare and submit a Sediment Response Plan as part of the RD submittals. The plan shall specify:

- the schedule, equipment and procedures to be used in the dredging and backfilling of the Wisconsin River;
- The managing of removed contaminated sediment;

- The confirmatory sediment sampling that will demonstrate that the RAO for River Sediment has been achieved;
- The schedule, materials, equipment and procedures to be used to place the clean cover on the contaminated Pfiffner Pioneer Park Pond sediment as specified in the ROD; and
- The schedule, equipment and procedures for the ongoing routine monitoring and maintenance to ensure the long-term effectiveness of the clean sand cover on the pond. This information will be incorporated into the Operation and Maintenance (O&M) Plan for the Site.

B. Soil Cover Monitoring and Maintenance Plan

Respondent shall prepare and submit a Soil Cover Monitoring and Maintenance Plan (SCMMP) as part of the RD submittals. The plan shall describe:

- The schedule, materials, equipment and procedures for ongoing routine monitoring and maintenance of the cover components to ensure the long-term effectiveness of the existing city parking lot and surface soils as protective covers of the contaminated subsurface soil. This information will be incorporated into the O&M Plan for the Site.
- A contingency plan for the actions that will be taken to ensure protectiveness in the event the city decides to remove, repave, or reconfigure the parking lot or other construction activities take place on-Site.

C. Natural Attenuation Implementation and Monitoring Plan

Respondent shall submit a Natural Attenuation Implementation and Monitoring Plan (NAIMP) that establishes a program for evaluating the progress of the aquifer toward achieving groundwater CLs through natural attenuation. The NAIMP shall describe the data collection and interpretation methods that will be used to determine:

- The rate of progress toward achieving groundwater CLs;
- The natural attenuation mechanisms at work;
- The remedy's continued protectiveness of human health and the environment until CLs are attained;
- That potential risks from Site-related vapors are below acceptable risk-based levels.

The NAIMP shall be consistent with the following guidance documents:

- *Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites*, EPA Directive 9200.4-17P, April 1999, <http://www.epa.gov/OUST/directiv/d9200417.pdf>;
- *Performance Monitoring of MNA Remedies for VOCs in Groundwater*, EPA/600/R-04/027, April 2004, http://www.epa.gov/ada/download/reportsl600R04027/600R04027_fm.pdf; and
- *Region 5 Framework for Monitored Natural Attenuation Decisions for Groundwater*, EPA, September 27, 2000, <http://www.epa.gov/region5/cleanup/region5-mna-framework-2000.pdf>.

1. Standards for groundwater monitoring

The groundwater monitoring program shall be designed to detect and monitor relevant Site conditions including, but not limited to:

- Any horizontal or vertical expansion or contraction of the Site groundwater contaminant plume, especially in areas where homes or other buildings may be at risk for vapor intrusion;
- Changes in the concentration of Site groundwater contaminants over time to verify whether groundwater contamination levels are declining over time; and
- Changes in the chemical properties of the groundwater indicative of conditions favorable to MNA.
- Other objectives referenced on pages 22-23 of the EPA Directive Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites (April 1999).

As appropriate to meet the above requirements and objectives, the final details of the monitoring program will include the use of sentry wells (wells that are not impacted by the Site's groundwater contamination), performance wells (wells located in the area of the groundwater contamination), and wells to monitor the potential for vapor intrusion.

2. Schedule for groundwater monitoring

The NAIMP shall contain a detailed schedule specifying the tasks to be performed, the sampling frequencies, and a schedule for implementation. Initially, groundwater monitoring shall be conducted on a quarterly basis. After contaminant trends in groundwater have been established and seasonal variations in contaminant levels have been adequately identified, and after reasonable opportunity for review and comment by WDNR, Respondent may petition EPA to reduce the sampling frequency and/or the type and/or number of sampling locations. Any such petition shall include a technically sound and defensible discussion of the rationale and the basis for the proposed modifications and shall be submitted as part of the Annual Report. If EPA

approves a reduction in monitoring, modifications shall be incorporated into a revised NAIMP, subject to EPA's approval in consultation with WDNR. A revised NAIMP shall be submitted to EPA within forty-five (45) days of EPA approval of a reduction in monitoring or any other change in monitoring.

The NAIMP shall indicate that if the data collected during the monitoring program, or other information obtained during the RA, indicates that the monitoring program is inadequate for providing the information needed to meet its requirements and objectives, EPA, in consultation with WDNR, may require that the NAIMP be modified, the monitoring frequency be increased, and/or additional monitoring wells be installed.

3. Cessation of groundwater monitoring

Groundwater monitoring shall be conducted until it is satisfactorily demonstrated that:

- a. Groundwater is restored to drinking water standards for all COCs and the standards will continue to be attained at all monitoring wells throughout the groundwater plume; and
- b. Potential risks from Site-related vapors will remain below acceptable risk-based levels on a permanent basis.

The NAIMP shall indicate that once it has been demonstrated that the drinking water standards for all COCs have been attained, the monitoring program shall continue to be implemented until the performance standards have been consecutively attained at all monitoring wells throughout the groundwater plume for a minimum period of three years based on a minimum of three sampling events no less than one year apart and until it is demonstrated, subject to EPA's approval in consultation with WDNR, that the chemical concentrations in the groundwater are stable and will remain below performance standards on a permanent basis.

4. Maintenance of the monitoring system

The NAIMP shall indicate that if any of the monitoring wells or other permanent sample collection points (e.g., piezometers, staff gauges, permanent soil gas collection points) designated for sampling in the NAIMP or subsequent revisions are destroyed or in any way become unusable, a plan to repair or replace each well or permanent sample collection point shall be submitted to EPA and WDNR within thirty (30) days of discovery of damage or destruction unless deemed unnecessary by EPA, in consultation with WDNR. Within thirty (30) days of EPA's approval of the well/sample collection point repair/replacement plan or prior to the next required sampling event, whichever is later, each well/sample collection point shall be repaired or replaced, as appropriate, in accordance with the approved well/sample collection point repair/replacement plan, subject to the access and force majeure provisions in the AOC. However, if repair or replacement of the well occurs after a scheduled sampling event and it will be more than three months until the next sampling event, a sample will be collected from the newly-repaired or replaced monitoring well within thirty (30) days after the repair or installation is completed.

5. Emergency Notification

The NAIMP shall indicate that, if either or both of the following conditions are identified, Respondent shall notify EPA within fourteen (14) calendar days of identification and submit to EPA a Proposal for Action to address the condition(s) within thirty (30) calendar days of identification:

- Site-related vapors are migrating or pose a reasonable risk of migrating into any new or existing homes or buildings above acceptable risk-based levels; or
- Land use conditions change so that a potential human receptor is identified who may be exposed to contaminated groundwater.

The NAIMP shall indicate that, if any or all of the following conditions are identified, Respondent shall notify EPA within thirty (30) calendar days of identification and submit to EPA a Proposal for Action to address the identified condition(s) within sixty (60) calendar days of identification:

- The Site's groundwater contamination has expanded horizontally or vertically beyond the area of groundwater contamination determined during the RD;
- Site groundwater contaminant concentrations are increasing; or
- Changes in groundwater use conditions, land use conditions, aquifer characteristics or groundwater conditions are identified.

Any Proposal for Action submitted under this section of the SOW shall include a schedule for implementation and reporting. The Proposal for Action would outline specific actions to be taken to address one or more of the above conditions. If an alternate groundwater RA is required based on EPA's determination that monitored natural attenuation will not lead to attainment of cleanup objectives in a reasonable time frame or based on other criteria such as those listed on page 24 of the EPA directive *Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites* (April 1999), a plan for the alternate remedy would be submitted in a Groundwater Contingency Plan (see Section IV.9 below).

6. Additional groundwater studies

If, at any time during the RD or RA, EPA determines that additional studies other than those described above are necessary to further characterize conditions at or around the Site, to address the potential for a vapor intrusion concern in structures at or in the vicinity of the Site, to implement the RD/RA, or to meet performance standards set forth in the AOC and this SOW, Respondent shall submit an Additional Studies Workplan within ninety (90) days of notification by EPA, and upon EPA's approval of that plan, shall perform such additional studies.

7. Reporting Requirements

The NAIMP shall include reporting requirements to document whether progress is being made toward short-term and long-term performance goals and RAOs, whether monitoring requirements are being met, and whether the RA remains protective. The reporting in the NAIMP shall be after each sampling event and annually. These reporting requirements will be incorporated into the O&M Plan for the Site.

a. Groundwater Sampling Reports

The NAIMP shall indicate that within sixty (60) days of each quarterly sampling event and within ninety (90) days of each less frequent sampling event, Respondent shall submit to EPA and WDNR a Groundwater Sampling Report which will include the tabulated analytical results of the sampling event and a summary of the sample results. The submittal to EPA will include the raw analytical data, the data validation package, and a synopsis of the validated data including summary tables. The validated data shall be provided as a .pdf file on compact disc and in an electronic format that is compatible with EPA Region 5's database. Each Groundwater Sampling Report will document whether any of the following conditions occurred:

- 1) Groundwater contamination expanded horizontally or vertically beyond the area of groundwater contamination determined during the RD;
- 2) Site-related vapors are migrating or pose a reasonable risk of migrating into any new or existing homes or buildings above acceptable risk-based levels;
- 3) Changes in groundwater use conditions, land use conditions, aquifer characteristics or groundwater conditions are identified.

8. Annual Report

The NAIMP shall indicate that an Annual Report summarizing the tasks performed during the previous year and the results of the previous years' sampling and monitoring events will be submitted to EPA and WDNR on a yearly basis. The Annual Report shall include thorough, detailed discussions that are supported by appropriate tables, figures, and calculations to demonstrate whether the RA is making sufficient progress toward meeting remedial objectives within a reasonable timeframe and whether the remedy is protective of human health and the environment.

The Annual Report shall include:

- a. A summary of the past year's sampling activities;
- b. Tables showing the complete set of monitoring results for each sampling location (including data collected during the RI/FS, the additional groundwater studies, and all sampling rounds);

- c. Results of statistically significant trend analyses and comparison to baseline;
- d. A discussion about any horizontal or vertical expansion of the groundwater contamination;
- e. A discussion about any changes in land or groundwater use in the area of the Site and any changes in the boundaries of the Site;
- f. A discussion about changes in the chemical composition of groundwater contaminants over time and changes in biochemical parameters in the subsurface (such as dissolved oxygen concentrations) and an evaluation as to whether there is evidence that aerobic or anaerobic biodegradation is occurring, and an evaluation as to whether changes in biochemical or other parameters will reduce the efficacy of any natural attenuation processes;
- g. A discussion of any potentially toxic and/or mobile transformation products;
- h. A discussion of any new releases, including those related to desorption of contaminants from subsurface soil, that could impact the effectiveness of the natural attenuation remedy;
- i. An evaluation as to whether contaminant concentrations will attain performance standards in a reasonable timeframe based on calculation of attenuation rate constants and other information about the progress of natural attenuation, as described in the three EPA guidance documents referenced in the first paragraph of this section;
- j. A discussion about any maintenance activities conducted during the past year, any other problems encountered, and the outcome(s) or resolution(s);
- k. A discussion about any contingency actions that were implemented during, the past year, the type(s) of contingency action(s) implemented, and the outcome(s); and
- l. A discussion about whether any contingency action(s) need to be implemented, the type(s) of contingency action(s) proposed, and a schedule for implementation.
- m. The Annual Report shall also include maps that show:
 - n. The boundaries of the Site shown in the previous year's report and any revisions to the boundaries of the Site;
 - o. The extent of contaminated groundwater in both the shallow and deep aquifer for both the current and previous year; and
 - p. Groundwater elevation contours for both the shallow and deep aquifers and surface water elevation contours.

The NAIMP shall indicate that each year's draft Annual Report will be submitted to EPA and WDNR within ninety (90) days of the last sampling event for each year. A final Annual Groundwater Sampling Report shall be prepared and submitted which fully and satisfactorily addresses each of EPA's comments on the draft Annual Report within thirty (30) days of receipt of EPA comments. The final Annual Report shall include a response to comments explaining how each of EPA's comments on the draft Annual Report was addressed. All revisions to the Annual Report will be identified in the response to comments.

9. Groundwater Contingency Plan

The NAIMP shall specify that if EPA determines that MNA will not result in the attainment of performance standards within a reasonable timeframe, a contingency remedy may be implemented. The contingency remedy may include actions such as pumping and treating groundwater, installation of permeable reactive barriers, subsurface injection of a substrate to promote oxidative or reductive degradation, or other innovative technologies. If EPA determines that it is technically impracticable to restore groundwater to drinking water standards using available remedial technologies, the Agency may issue a technical impracticability (TI) waiver. In the case of a TI waiver, an alternative cleanup strategy that is fully protective of human health and the environment would need to be identified.

The types of criteria EPA would use to determine that a contingency remedy was required are discussed on pages 24-25 of the EPA directive *Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites* (April 1999). Such criteria generally include, but are not limited to, the following:

- Contaminant concentrations in soil or groundwater exhibit an increasing trend not predicted during remedy selection;
- Near-source wells exhibit large concentration increases indicative of a new or renewed release;
- Contaminants are identified in monitoring wells located outside of the original plume boundary;
- Contaminant concentrations are not decreasing at a sufficiently rapid rate to meet RAOs; and
- Changes in land and/or groundwater use will adversely affect the protectiveness of the remedy.

Sampling variability and seasonal fluctuations may affect the analysis of some of these criteria. Sufficient data will be collected and analyzed to ensure that these factors can be adequately assessed to mitigate the influence of these data before determining whether to trigger additional groundwater remediation measures. Sampling variability and seasonal fluctuations will be taken into account when evaluating whether MNA is making sufficient progress toward performance standards. The decision to invoke additional groundwater remediation measures may be made

during a periodic review of the RA, which will occur at least every five years, in accordance with CERCLA section 121(c). Within sixty (60) days of EPA's determination that a contingency remedy is necessary, Respondent shall submit a draft Groundwater Contingency Plan. A final Groundwater Contingency Plan shall be submitted within thirty (30) days of receipt of EPA comments on the draft plan. The contingency remedy shall be implemented in accordance with the schedule in the approved final Groundwater Contingency Plan.

10. Monitoring Well and Borehole Abandonment

The NAIMP shall describe abandonment procedures for boreholes that were not completed as monitoring wells and monitoring wells that are no longer being utilized for groundwater quality sampling or groundwater level measurements shall be abandoned properly to ensure public safety. Well/borehole abandonment shall consist either of a method for well removal and simultaneous grouting of the borehole with bentonite, neat cement or a bentonite/cement mixture, or a method for grouting the well in-place that ensures the complete sealing of the well.

D. Quality Assurance Project Plan

Respondent shall develop a Site-specific QAPP, covering sample analysis and data handling for samples collected in all phases of future Site work, based upon the AOC and guidance provided by EPA. The QAPP shall be consistent with the requirements of the EPA Contract Lab Program (CLP) for laboratories proposed outside the CLP. The QAPP be prepared in accordance with the *Intergovernmental Data Quality Task Force Uniform Federal Policy for QAPPs*, EPA-505-B-04-900A, March 2005 (UFP-QAPP). The UFP-QAPP describes policy, organization, and functional activities, and the data quality objectives and measures necessary to achieve adequate data for use in planning and documenting the sampling investigation. The UFP-QAPP shall at a minimum include:

1. Project description
 - a. Facility location history
 - b. Past data collection activity
 - c. Project scope
 - d. Sample network design
 - e. Parameters to be tested and frequency
 - f. Project schedule
2. Project organization and responsibility
3. Quality organization and responsibility
 - a. Level of quality control effort
 - b. Accuracy, precision and sensitivity of analysis
 - c. Completeness, representativeness and comparability
4. Sampling procedures
5. Sample custody

- a. Field-specific custody procedures
 - b. Laboratory chain-of-custody procedures
6. Calibration procedures and frequency
- a. Field instruments/equipment
 - b. Laboratory instruments
7. Analytical procedures
- a. Non-contract laboratory program analytical methods
 - b. Field screening and analytical protocol
 - c. Laboratory procedures
8. Internal quality control checks
- a. Field measurements
 - b. Laboratory analysis
9. Data reduction, validation, and reporting
- a. Data reduction
 - b. Data validation
 - c. Data reporting
10. Performance and system audits
- a. Internal audits of field activity
 - b. Internal laboratory audit
 - c. External field audit
 - d. External laboratory audit
11. Preventive maintenance
- a. Routine preventive maintenance procedures and schedules
 - b. Field instruments/equipment
 - c. Laboratory instruments
12. Specific routine procedures to assess data precision, accuracy, and completeness
- a. Field measurement data
 - b. Laboratory data
13. Corrective Action
- a. Sample collection/field measurement
 - b. Laboratory analysis
14. Quality assurance reports to management

Respondent shall attend a pre-QAPP meeting with EPA. Respondent shall submit a draft QAPP to EPA for review and approval.

E. Health and Safety Plan

Respondents shall develop a HSP which is designed to protect on-Site personnel and area residents from physical, chemical and all other hazards posed by this remedial action. The HSP shall follow EPA guidance and all OSHA requirements as outlined in 29 C.F.R. §§ 1910 and 1926, and shall develop the performance levels and criteria necessary to address the following areas:

1. Facility description
2. Personnel
3. Levels of protection
4. Safe work practices and safeguards
5. Medical surveillance
6. Personal and environmental air monitoring
7. Personal protective equipment
8. Personal hygiene
9. Decontamination - personal and equipment
10. Site work zones
11. Contaminant control
12. Contingency and emergency planning
13. Logs, reports and record keeping

F. Contingency Plan [Stand Alone or in HSP]

Respondents shall submit a Contingency Plan describing procedures to be used in the event of an accident or emergency at the Site. The Contingency Plan shall be prepared in accordance with 40 C.F.R. § 300.150 of the National Contingency Plan and shall include, at a minimum, the following:

1. Name of the person or entity responsible for responding in the event of an emergency incident;
2. Plan and date(s) for meeting(s) with the local community, including local, State and Federal agencies involved in the cleanup, as well as local emergency squads and hospitals;
3. First aid medical information;
4. Air Monitoring Plan (if applicable); and
5. Spill Prevention, Control, and Countermeasures (SPCC) Plan (if applicable), as specified in 40 C.F.R. Part 109, describing measures to prevent and contingency plans for potential spills and discharges from materials handling and transportation.

G. Field Sampling Plan

Respondent shall develop a FSP in accordance with the *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA*, October 1988. The FSP should supplement the QAPP and address all sample collection activities.

H. Construction Quality Assurance Plan

Respondent shall submit a CQAP which describes the Site-specific components of the quality assurance program which shall ensure that the completed project meets or exceeds all design criteria, plans, and specifications. The CQAP shall contain, at a minimum, the following elements:

1. Responsibilities and authorities of all organizations and key personnel involved in the design and construction of the remedial action.
2. Qualifications of the Quality Assurance Official to demonstrate he possesses the training and experience necessary to fulfill his identified responsibilities.
3. Protocols for sampling and testing used to monitor construction.
4. Identification of proposed quality assurance sampling activities including the sample size, locations, frequency of testing, acceptance and rejection data sheets, problem identification and corrective measures reports, evaluation reports, acceptance reports, and final documentation. A description of the provisions for final storage of all records consistent with the requirements of the AOC shall be included.
5. Reporting requirements for CQAP activities shall be described in detail in the CQAP. This shall include such items as daily summary reports, inspection data sheets, problem identification and corrective measures reports, design acceptance reports, and final documentation. Provisions for the final storage of all records shall be presented in the CQAP.
6. Respondent shall dispose of any removed debris off-site, as appropriate, to an appropriate approved landfill or other approved facility. These waste streams include but are not limited to: personnel protective equipment and soils, sediment, solids, and liquids resulting from decontamination of equipment, additional investigations, and RA construction.

I. Institutional Control Implementation and Assurance Plan

Respondent shall prepare an Institutional Control Implementation and Assurance Plan (ICIAP) to facilitate achievement of the IC objectives set out in the ROD and the AOC. The ICIAP shall include, but shall not be limited to:

1. A description of the pathways for potential human exposure to waste material that may remain during and/or after completion of construction of the RA;
2. A description of the areas where human activities should be restricted, including legal descriptions for such areas, sample maps, and a plan for preparing final survey maps (e.g., survey of hazardous waste cap);
3. A list of properties where Proprietary Controls are needed;

4. A Site Map showing the boundaries of the Site, Site features, Site zoning designations, streets, easements or other encumbrances, property ownership, assessor's parcel number or other recorded plat or survey information, groundwater plume boundary exceeding CLs;
5. Geographic Information System (GIS) coordinates of the boundaries of the Site, Site features including monitoring wells, and easements or other encumbrances. The accuracy of the coordinates should be identified and coordinates should be submitted in an EPA-approved format;
6. A description of the proposed Institutional Controls and their purpose;
7. A description of the proposed duration of each Institutional Control and an explanation for such duration;
8. A schedule for implementing each Institutional Control;
9. A schedule for completing title work;
10. Draft Proprietary Controls enforceable under state law to implement the proposed land/water use restrictions;
11. A description of the authority of each affected property owner to implement each Proprietary Control, including title insurance commitments or other title evidence acceptable to EPA for proposed Proprietary Controls;
12. A description of all prior liens and encumbrances existing on any real property that may affect the Proprietary Controls or the protectiveness of the remedy, and a plan for the release or subordination of any such liens and encumbrances (unless EPA waives the release or subordination of such liens or encumbrances);
13. A plan for monitoring, maintaining, reporting on, and ensuring the continued efficacy of the ICs and a contingency plan in the event ICs are ineffective; and
14. A schedule for inspections annual certifications regarding whether the ICs remain in place, regarding whether the ICs have been complied with, and regarding enforcement of the ICs. The ICIAP shall be effective upon EPA's approval, and shall become an enforceable requirement of the AOC.

Items IV.I.13 and IV.I.14 will be included as part of the site Operation and Maintenance (O&M) Plan to ensure that ICs are maintained, are complied with in both the short term and in the long term, and remain in place until terminated in accordance with the AOC.

Institutional controls shall restrict future uses of the Site (including, but not limited to, on-site excavations, invasive construction, drilling, and construction of buildings or structures, and

residential use) and shall prohibit the installation of groundwater wells for potable and non-potable uses at the Site until performance goals for groundwater have been attained, unless otherwise required by the RA and/or prior approval from EPA has been obtained. Any other uses of the Site that would be inconsistent with the RA shall also be prohibited without prior approval from EPA. The restrictions regarding future uses of the Site may be modified subject to written approval by EPA based on demonstration by Respondent that the proposed, modified use of the Site will not interfere with the remedy or pose a threat to human health and the environment.

J. Operation and Maintenance Plan

Respondent shall describe the long-term operation and maintenance (O&M) of the Site remedy. O&M activities shall include groundwater monitoring; inspection and maintenance of the soil cover; inspection, maintenance and replacement, if necessary, of the groundwater monitoring wells; monitoring and maintenance of the sand cover in the Pfiffner Pioneer Park Pond; and annual review and certification of institutional controls. Appropriate long-term groundwater monitoring may require the installation of additional monitoring wells or abandonment of existing wells that are no longer necessary.

V. SUMMARY OF MAJOR DELIVERABLES/SCHEDULE

A summary of the project schedule and reporting requirements contained in this SOW is presented below:

Deliverable	Due Date
Submit proposal for Supervising Contractor	Thirty (30) days after the effective date of the AOC.
Draft Remedial Design Workplan	Sixty (60) days after Notice of Authorization to Proceed with RD.
Final Remedial Design Workplan	Thirty (30) days after receipt of EPA comments on Draft RD Workplan.
Preliminary Design (30%) , including but not limited to: <ul style="list-style-type: none"> • Draft Sediment Response Workplan • Draft Soil Cover Monitoring and Maintenance Plan • Draft Natural Attenuation Implementation and Monitoring Plan 	Sixty (60) days after receipt of EPA comments on Final RD Workplan.
Draft Quality Assurance Project Plan Draft Health and Safety Plan Draft Contingency Plan (if stand-alone) Draft Field Sampling Plan Draft Construction Quality Assurance Plan Draft ICIAP Draft O&M Plan	In accordance with schedule described in the Remedial Design Workplan.

Deliverable	Due Date
Pre-final Design (95%), including but not limited to: <ul style="list-style-type: none"> • Final Sediment Response Workplan • Monitoring and Maintenance Plan • Final Natural Attenuation Implementation and Monitoring Plan • Final Quality Assurance Project Plan • Final Health and Safety Plan • Final Contingency Plan (if stand-alone) • Final Field Sampling Plan • Final Construction Quality Assurance Plan • Final ICIAP • Final O&M Plan 	Thirty (30) days after receipt of EPA comments on Preliminary Design Documents.
Final Design Documents (100%)	Thirty (30) days after receipt of EPA comments on Pre-final Design.
Progress Reports	Thirty (30) days after the end of each monthly reporting period.

VI. REGULATIONS AND GUIDANCE DOCUMENTS

The following list, although not comprehensive, comprises many of the regulations and guidance documents that apply to the RD/RA process:

American National Standards Practices for Respiratory Protection. American National Standards Institute Z88.2-1980, March 11, 1981.

ARCS Construction Contract Modification Procedures September 89, OERR Directive 9355.5-01/FS.

CERCLA Compliance with Other Laws Manual, Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, August 1988 (DRAFT), OSWER Directive No. 9234.1-01 and -02.

Community Relations in Superfund — A Handbook, U.S. EPA, Office of Emergency and Remedial Response, June 1988, OSWER Directive No. 9230.0-3B.

A Compendium of Superfund Field Operations Methods, Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, EPA/540/P-87/001a, August 1987, OSWER Directive No. 9355.0-14.

Construction Quality Assurance for Hazardous Waste Land Disposal Facilities, U.S. EPA, Office of Solid Waste and Emergency Response, October 1986, OSWER Directive No. 9472.003.

Contractor Requirements for the Control and Security of RCRA Confidential Business Information, March 1984.

Data Quality Objectives for Remedial Response Activities, U.S. EPA, Office of Emergency and Remedial Response and Office of Waste Programs Enforcement, EPA/540/G-87/003, March 1987, OSWER Directive No. 9335.0-7B.

Engineering Support Branch Standard Operating Procedures and Quality Assurance Manual, U.S. EPA Region W, Environmental Services Division, April 1, 1986 (revised periodically).

EPA NEIC Policies and Procedures Manual, EPA-330/9-78-001-R, May 1978, revised November 1984.

Federal Acquisition Regulation, Washington, DC: U.S. Government Printing Office (revised periodically).

Guidance on EPA Oversight of Remedial Designs and Remedial Actions Performed by Potential Responsible Parties, U.S. EPA Office of Emergency and Remedial Response, EPA/540/G-90/001, April 1990.

Guidance on Expediting Remedial Design and Remedial Actions, EPA/540/G-90/006, August 1990.

Guidance on Remedial Actions for Contaminated Groundwater at Superfund Sites, U.S. EPA Office of Emergency and Remedial Response (DRAFT), OSWER Directive No. 9283.1-2.

Guide for Conducting Treatability Studies Under CERCLA, U.S. EPA, Office of Emergency and Remedial Response, Prepublication version.

Guide to Documenting Cost and Performance for Remediation Projects, Publication EPA-542-B-95-002, March 1995.

Guide to Management of Investigation-Derived Wastes, U.S. EPA, Office of Solid Waste and Emergency Response, Publication 9345.3-03FS, January 1992.

Guidelines and Specifications for Preparing Quality Assurance Project Plans, U.S. EPA, Office of Research and Development, Cincinnati, OH, QAMS-004/80, December 29, 1980.

Health and Safety Requirements of Employees Employed in Field Activities, U.S. EPA, Office of Emergency and Remedial Response, July 12, 1982, EPA Order No. 1440.2.

Interim Guidance on Compliance with Applicable of Relevant and Appropriate Requirements, U.S. EPA, Office of Emergency and Remedial Response, July 9, 1987, OSWER Directive No. 9234.0-05.

Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans, U.S. EPA, Office of Emergency and Remedial Response, QAMS-005/80, December 1980.

Methods for Evaluating the Attainment of Cleanup Standards: Vol. 1, Soils and Solid Media, February 1989, EPA 23/02-89-042; Vol. 2, Groundwater (Jul 1992).

National Oil and Hazardous Substances Pollution Contingency Plan; Final Rule, Federal Register 40 C.F.R. Part 300, March 8, 1990.

NIOSH Manual of Analytical Methods, 2nd edition. Volumes I-VII for the 3rd edition, Volumes I and II, National Institute of Occupational Safety and Health.

Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities, National Institute of Occupational Safety and Health/Occupational Health and Safety Administration/United States Coast Guard/Environmental Protection Agency, October 1985.

Performance Monitoring of MNA Remedies for VOCs in Ground Water, EPA/600/R-04/027, April 2004.

Permits and Permit Equivalency Processes for CERCLA On-Site Response Actions, February 19, 1992, OSWER Directive 9355.7-03.

Procedure for Planning and Implementing Off-Site Response Actions, Federal Register, Volume 50, Number 214, November 1985, pages 45933-45937.

Procedures for Completion and Deletion of NPL Sites, U.S. EPA, Office of Emergency and Remedial Response, April 1989, OSWER Directive No. 9320.2-3A.

Quality in the Constructed Project: A Guideline for Owners, Designers and Constructors, Volume 1, Preliminary Edition for Trial Use and Comment, American Society of Civil Engineers, May 1988.

Region 5 Framework for Monitored Natural Attenuation Decisions for Groundwater, EPA, September 27, 2000.

Remedial Design/Remedial Action (RD/RA) Handbook, U.S. EPA, Office of Solid Waste and Emergency Response (OSWER) 9355.0-04B, EPA 540/R-95/059, June 1995.

Revision of Policy Regarding Superfund Project Assignments, OSWER Directive No. 9242.3-08, December 10, 1991. [Guidance, p. 2-2]

Scoping the Remedial Design (Fact Sheet), February 1995, OSWER Publ. 9355-5-21 FS.

Standard Operating Safety Guides, U.S. EPA, Office of Emergency and Remedial Response, November 1984.

Standards for the Construction Industry, Code of Federal Regulations, Title 29, Part 1926, Occupational Health and Safety Administration.

Standards for General Industry, Code of Federal Regulations, Title 29, Part 1910, Occupational Health and Safety Administration.

Structure and Components of 5-Year Reviews, OSWER Directive No. 9355.7-02, May 23, 1991. [Guidance, p. 3-5]

Superfund Guidance on EPA Oversight of Remedial Designs and Remedial Actions Performed by Potentially Responsible Parties, April 1990, EPA/540/G-90/001.

Superfund Remedial Design and Remedial Action Guidance, U.S. EPA, Office of Emergency and Remedial Response, June 1986, OSWER Directive No. 9355.0-4A.

Superfund Response Action Contracts (Fact Sheet), May 1993, OSWER Publ. 9242.2-08FS.

TLVs-Threshold Limit Values and Biological Exposure Indices for 1987-88, American Conference of Governmental Industrial Hygienists.

Treatability Studies Under CERCLA, Final. U.S. EPA, Office of Solid Waste and Emergency Response, EPA/540/R-92/071a, October 1992.

Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites, OSWER Directive 9200.4-17P, April 1999.

USEPA Contract Laboratory Program Statement of Work for Inorganic Analysis, U.S. EPA, Office of Emergency and Remedial Response, July 1988.

USEPA Contract Laboratory Program Statement of Work for Organic Analysis, U.S. EPA, Office of Emergency and Remedial Response, February 1988.

User's Guide to the EPA Contract Laboratory Program, U.S. EPA, Sample Management Office, August 1982.

Value Engineering (Fact Sheet), U.S. EPA, Office of Solid Waste and Emergency Response, Publication 9355.5-03FS, May 1990.