

**Nuclear Metals, Inc. Superfund Site  
Non-Time Critical Removal Action (NTCRA)**

**Interim Site Management & Security Plan**

*Prepared by:*



***de maximis, inc.***

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# INTERIM SITE MANAGEMENT & SECURITY PLAN

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## 1.0 INTRODUCTION

This document has been prepared on behalf of the Nuclear Metals, Inc. Site Respondents pursuant to the Administrative Settlement Agreement and Order on Consent for Non-Time Critical Removal Action, U.S. EPA Region 1, CERCLA Docket No.: CERCLA -01-2011-004 and its appendices (together, the Settlement Agreement) for the Nuclear Metals, Inc. Superfund Site in Concord, MA (the Site). The Settlement Agreement became effective on August 9, 2011. Among the appendices to the Settlement Agreement is the Statement of Work (SOW).

Figure 1-1 shows the Site location. Figure 1-2 shows key Site features and information pertinent to this plan.

This *Interim Site Management and Security Plan* (Interim SMSP) has been prepared to address the requirements of Section II.B.2.a. of the SOW, which requires the inclusion of an SMSP as a component of the *Project Operations Plan* (POP). Its purpose is to provide the United States Environmental Protection Agency (USEPA) and the Massachusetts Department of Environmental Protection (MassDEP) with a written understanding and commitment of how various project aspects such as access, security, contingency procedures, management responsibilities, waste disposal, budgeting and data handling are to be managed during the initial phase of the project. The minimum requirements of the SMSP are specified in Section II.B.2.a. of the SOW, and have been addressed in the development of this interim plan.

## 2.0 PROJECT ROLES AND RESPONSIBILITIES

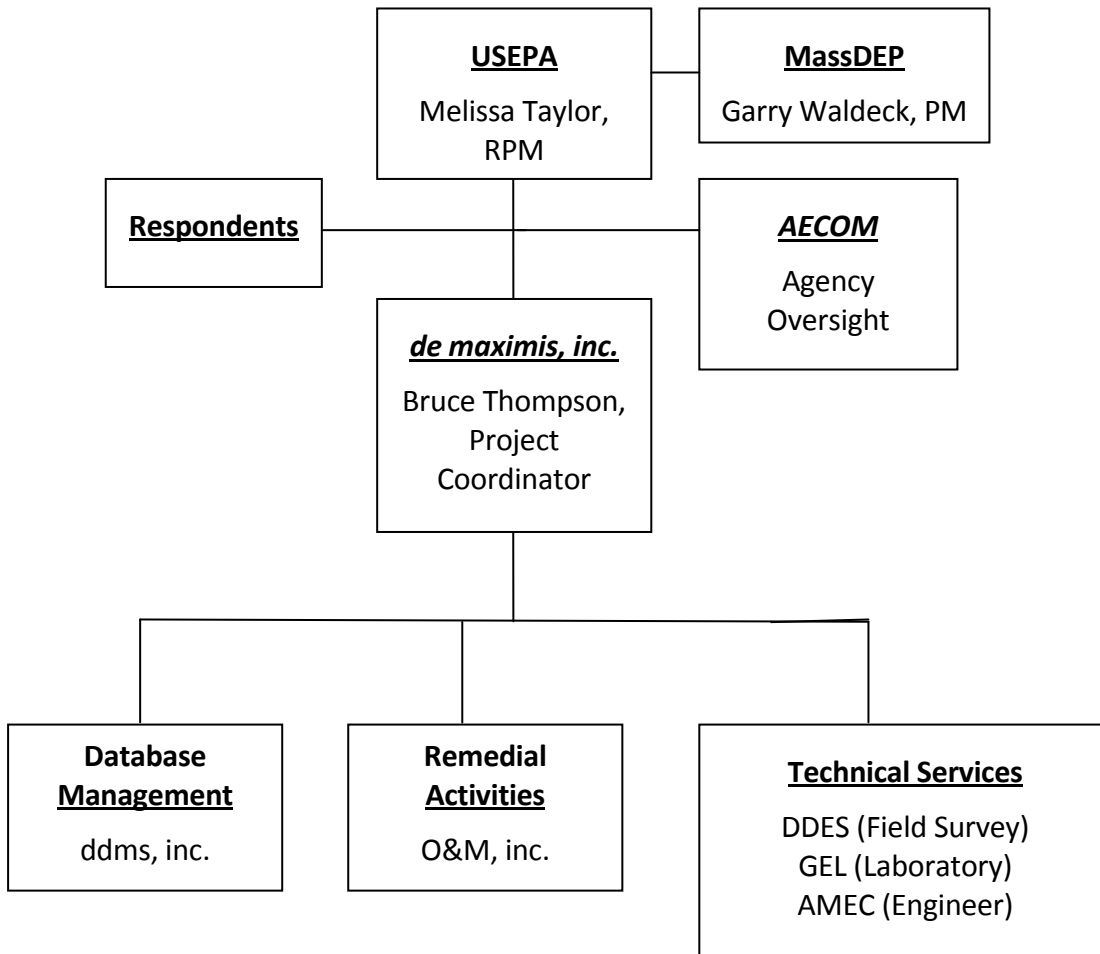
The following table lists the key participants in the NTCRA activities during the Interim Work Period, and identifies their roles and contact information:

Organization/ Contact	Role	Contact Information
USEPA	<ul style="list-style-type: none"> <li>Lead regulatory agency overseeing removal actions at the Site.</li> </ul>	Melissa Taylor Remedial Project Manager EPA Region 1 5 Post Office Square, Suite 100 Mail Code OSRR 07-4 Boston, MA 02109-3912 (617) 918-1348 - Office Taylor.Melissag@epamail.gov
MassDEP	<ul style="list-style-type: none"> <li>State regulatory agency involved in project review and providing support to USEPA.</li> </ul>	Garry Waldeck Environmental Engineer MassDEP-BWSC 1 Winter St, Boston MA 02108 617 348-4017 - Office garry.waldeck@state.ma.us
NMI Respondents	<ul style="list-style-type: none"> <li>Signatories to the Settlement Agreement responsible for overall performance of NTCRA activities for the Site</li> </ul>	c/o Bruce Thompson, <i>de maximis, inc.</i> (see below)
<i>de maximis, inc.</i> (de maximis)	<ul style="list-style-type: none"> <li>General Contractor</li> <li>Project Coordinator</li> </ul>	Bruce Thompson 200 Day Hill Road Suite 200 Windsor, CT 06095 (860) 298-0541 - Office (860) 298-0561 - Fax (860) 662-0526 - Mobile brucet@demaximis.com
	<ul style="list-style-type: none"> <li>Site Operations Manager</li> </ul>	Stan Baker (248) 202-7078 – Mobile sbaker@demaximis.com

Organization/ Contact	Role	Contact Information
<i>de maximis</i> Data Management Services, Inc. (ddms)	<ul style="list-style-type: none"> <li>• Provide data management services, including data validation and database management</li> </ul>	Polly Newbold ddms, inc. 186 Center Street, Suite 290 Clinton, NJ 08809 (908) 479-1975 - Office pnewbold@ddmsinc.com
General Engineering Laboratories (GEL)	<ul style="list-style-type: none"> <li>• Laboratory analytical services</li> </ul>	Edith Kent Project Manager 2040 Savage Road Charleston, SC 29407 (843) 769-7378 - Office (843) 769-7397 - Fax emk@gel.com
O&M, Inc	<ul style="list-style-type: none"> <li>• Contractor for general Site work</li> <li>• Respiratory Protection Program Administrator</li> </ul>	David Fuerst Remediation Manager 450 Montbrook Lane Knoxville, Tennessee 37919-2705 (865) 691-6254 - Office (865) 691-9595 - Fax dfuerst@oandm-inc.com
DDES	<ul style="list-style-type: none"> <li>• Subcontractor</li> <li>• Site Radiation Safety Officer</li> <li>• Site Certified Industrial Hygienist</li> </ul>	Matt Norton Project Manager 484 Lowell Street, Suite 1A Peabody, MA 01960 (978) 278-3399 - Office (978) 278-3397 - Fax (978) 844-0565 - Mobile mdnorton@ddesllc.com
AMEC	<ul style="list-style-type: none"> <li>• Subcontractor</li> <li>• Engineer</li> <li>• NTCRA Work Plans</li> </ul>	Nelson Walter Project Manager 511 Congress St. Suite 200 Portland, ME 04101 (207) 828-3637 - Voice (207) 772-4762 - Fax (207) 651-0315 - Mobile nwalter@mactec.com

The general project organization chart (below) depicts lines of communication and identifies key individuals. If the scheduling of the project requires different personnel to be appointed to the project, the organization chart will be updated, as required, consistent with the notification procedures identified in the Settlement Agreement.

**Project Organization Chart**





## **2.1 AGENCIES**

All formal communication from the Agencies (USEPA and MassDEP) regarding the Site will be directed to the Project Coordinator and the Respondents, as provided in the Settlement Agreement. In order to maximize the efficiency and usefulness of coordination with the Agencies during the project, and to maximize communications from the field, effective on-site communications between the On-Site Manager and the on-site Agency personnel and/or Agencies' representatives will be developed and implemented.

## **2.2 RESPONDENTS**

The Respondents are the signatories to the Settlement Agreement responsible to perform the NTCRA. All formal communication from the Respondents regarding the Site will be directed to the Agencies as provided in the Settlement Agreement.

## **2.3 PROJECT COORDINATOR/GENERAL CONTRACTOR**

The Respondents have retained *de maximis* to function as the General Contractor and Bruce Thompson of *de maximis* as their Project Coordinator.

### **2.3.1 Project Coordinator**

On behalf of the Respondents, Mr. Bruce Thompson will serve as the Project Coordinator. The Respondents designated him as their Project Coordinator in an August 23, 2011 letter to USEPA, and USEPA approved that designation on September 22, 2011. Mr. John Hunt will serve as the Alternate Project Coordinator. The Project Coordinator will direct subcontractors to assist with development and implementation of the NTCRA. In accordance with Paragraph 40 of the Settlement Agreement, Monthly Progress Report(s) will be compiled and submitted to the Agencies by the Project Coordinator on behalf of the Respondents.

The Project Coordinator is the primary contact with the Respondents, USEPA, MassDEP and subcontractors.

### **2.3.2 General Contractor**

On September 23, 2011, the Respondents designated *de maximis, inc.* as their General Contractor. All work performed by the Respondents pursuant to the Settlement Agreement shall be carried out under the direction and supervision of a qualified General Contractor. Per Section II.B. of the SOW, the Project Coordinator will be the primary contact for the General Contractor.

## **2.4 SUBCONTRACTORS(S)**

Subcontractors will be utilized by the Project Coordinator to complete components of the initial stabilization work including data management services, field survey and laboratory analysis. Subcontractors will report directly to the Project Coordinator or On-Site Manager.

### **3.0 PROPERTY OWNERSHIP AND ACCESS**

This section describes the arrangements for access necessary to implement the NTCRA, as required by Section IX of the Settlement Agreement.

All access agreements will apply to the Respondents, the United States on behalf of USEPA, and the Massachusetts Department of Environmental Protection, as well as their representatives (including contractors), for the purpose of conducting any activity related to the NTCRA.

#### **3.1 SITE ACCESS**

On March 17, 2003, the Respondents were granted access to the Site with limited access to the site structures during the Remedial Investigation (RI).

On September 15, 2011, an authorized representative of Starmet granted the Respondents access to the Site to perform the Work. The Work is defined as to “require access to the Property, as well as the demolition of all Structures located thereon, the transportation and off-site disposal of such Structures and all fixtures and personal property located herein, including, without limitation, furniture, supplies, equipment, and business records, the possible on-site disposal of construction debris, and other elements of the Work.” This access agreement is to become effective upon the date the last Starmet entity abandons the buildings, and in any event, no later than November 1, 2011. The last Starmet entity abandoned the buildings on November 2, 2011.

In parallel with Respondent’s efforts to obtain access, EPA pursued an independent process that resulted in a second access agreement. This agreement, between Starmet Corporation and EPA, provides for access for the purposes of implementing and monitoring the Work, verifying any data or information submitted to EPA, conducting investigations at or near the Site, obtaining samples, assessing the need for, planning, or implementing additional response actions at or near the Site, assessing implementation of quality assurance and quality control practices, inspecting and copying records, operating logs, contracts or other documents found on-site, and determining whether the Site or other real property is being used in a manner that is prohibited or restricted, or that may need to be prohibited or restricted. EPA’s access agreement was executed by an authorized representative of Starmet on September 9, 2011.

By letter of October 6, 2011 to the Respondents, the USEPA designated the Respondents and their officers, employees, agents, contractors, consultants, and representatives, as EPA’s authorized representatives solely for the purpose of entry onto the Starmet property “where such entry is needed to perform the Work, as that term is defined in the Settlement Agreement, from the date of this letter until EPA issues a Notice of Completion of the Work pursuant to Paragraph 124 of the Settlement Agreement.”

Standard hours of operation during the NTCRA will be 11 hours per day (7:00 am to 6:00 pm), Monday through Friday. No work will occur on Saturdays or Sundays. Work outside of these hours will only be scheduled with USEPA’s prior authorization.

### **3.2 ACCESS TO PRIVATE/PUBLIC PROPERTY**

There are no current plans for off-site field activities during the NTCRA. Should the results of activities during the Interim Work Period indicate a need to conduct activities on property beyond the boundaries of the Site, the Project Coordinator will coordinate as necessary with the owners of contiguous properties (abutters). This Interim SMSP will be updated with a map showing the properties, and will include the names, addresses and telephone numbers of property owners.

### **4.0 FINANCIAL REPORTING**

The project quarterly reports include an updated project cost estimate and cash flow projection.

### **5.0 SITE SECURITY AND CONTROL**

Site security and control during the Interim Work Period will be provided by existing fencing and gates, access controls, physical barriers, preventing unauthorized access to the Site buildings, installation of a security system and implementation of safe work practices.

#### **5.1 SITE CONTROL**

The Site and existing features are depicted on Figure 1-2, and represent the primary areas in which NTCRA related activities will be performed. Primary access to the Site is from Main Street to the north.

In general, minimal site modifications are anticipated for the purpose of implementing the interim activities. Anticipated modifications will be mobilization of a field trailer to be staged at the location indicated on Figure 5-1. The trailer will be mobilized in support of heavy or extended periods of field work. The trailer will provide a location for daily meetings, sample processing, and equipment storage.

A pre-demolition conditions survey will be performed, as required by SOW Section II.B.2.a., to define any recommendations to minimize the potential for NTCRA-related damage, e.g., due to vibration, truck traffic, etc., to Site structures and to structures adjacent to the Site. The final report of this survey will include a photographic log of building foundations.

#### **5.2 TRAFFIC CONTROL**

Traffic patterns and traffic controls will be designed to minimize impact on the local community. All off-site traffic plans will be coordinated with the Town of Concord.

#### **5.3 FENCING**

As shown on Figure 5-1, chain-link fencing fully encompasses the perimeter of the buildings. Access into this fenced area is via a swing gate along the driveway entrance on Main Street and

via several man-gates along portions of the perimeter fence. These features will be locked at all times except when access is necessary for equipment and personnel to perform activities in these areas.

#### **5.4 ACCESS CONTROLS**

During the Interim Work Period, fenced portions of the Site will only be accessible to authorized personnel. This includes representatives of the Agencies, the Respondents, and their respective consultants and contractors. Personnel requiring access to the Site should contact de maximis to make arrangements (e.g., to obtain a key or request an escort).

A sign-in/sign-out sheet (Figure 5-2) will be used to monitor personnel access to the Site. Visiting personnel will be required to record the date, time of entry and exit, and purpose for their visit. This sheet will be maintained inside the field office during normal operations and will be filed with the project records.

#### **5.5 PHYSICAL BARRIERS**

Physical barriers such as bollards and swing gates will be installed at access points to direct traffic to the site work trailers.

#### **5.6 SECURITY SYSTEM**

Site security will be provided to minimize theft, vandalism and/or access/exposure by unauthorized persons. Such practices include, but are not limited to:

- prevention of unauthorized access to the site buildings
- securing/locking construction equipment and tools during non-work periods,
- removing keys from motorized equipment,
- conducting a security review and check at the conclusion of each work day,
- perimeter lighting, and
- clearing and grubbing building perimeter and fence line.

All exterior doors will be secured and keyed alike to the extent practicable. Additionally, a security system will be installed to include perimeter sensors, door alarms, interior motion detection, video surveillance, and remote monitoring services for when the system is alarmed.

#### **6.0 FIRE PROTECTION SYSTEM**

The existing fire protection system will be maintained in coordination with the Concord Fire Department. Activities planned to maintain and repair the existing system include:

- lubricate/flush fire hydrants,
- inspect back flow preventers, and
- replace sprinkler heads as necessary.

## **7.0 SITE UTILITIES**

### **7.1 ELECTRIC SERVICE**

The existing electric service will be terminated and a temporary electric service will be installed for use during the NTCRA. The temporary electrical service is being designed to provide lighting, heating, and power drops for the operations. Service will also be provided to a fire panel.

### **7.2 WATER SERVICE**

The existing water service will be modified for use during the NTCRA. Water service will be designed to provide for personnel decontamination facilities as well as for water service for fire protection.

### **7.3 NATURAL GAS SERVICE**

The existing natural gas service will be modified for use during the NTCRA. Natural gas service will be designed to provide for heating units. The existing high pressure gas service will be decommissioned.

### **7.4 NOTICE TO ABUTTERS**

Owners of contiguous properties (abutters) will be provided with advance written notice of not less than 7 calendar days for activities including:

- when utility decommissioning will begin, and
- when building demolition activities will begin.

## **8.0 SAFE WORK PRACTICES**

A Health and Safety Plan (HASP) has been developed to perform the NTCRA. Special site controls that have been established by the HASP include:

### **8.1 RADIATION PROTECTION PROGRAM**

The purpose of the Radiation Protection Program is to inform and properly train workers on the necessary precautions to be observed when working in radiation-restricted areas at the Site. The Radiation Protection Program provides tools, such as a Radiological Work Permit (RWP) which is required for all tasks performed inside radiation-restricted areas. The RWP is used to describe the scope of work, to evaluate the associated hazards, and to describe the health, safety, operational, and radiological precautions that must be followed to perform the work.

### **8.2 BERYLLIUM PROTECTION PROGRAM**

The purpose of the Beryllium Protection Program is to inform and properly train workers on the necessary precautions to be observed when working in beryllium-regulated areas at the Site. Although all workers will be required to be familiar with the Beryllium Protection Program and to

be knowledgeable of the location of beryllium-regulated areas, only personnel specifically trained for beryllium work will perform work inside beryllium regulated areas. All beryllium work is anticipated to be subcontracted to companies that specialize in such work.

### **8.3 RESPIRATORY PROTECTION PROGRAM**

The purpose of the Respiratory Protection Program is to protect all employees of working at the Site from respiratory hazards, and to ensure that invasive activities are performed in compliance with OSHA 29 Code of Federal Regulation (CFR) §1910.134(c) Respiratory Protection Standard. Engineering controls to control airborne hazards are not feasible for many remediation operations at the Site. In situations where airborne contaminants cannot be controlled within regulatory limits, respiratory protection and other types of personal protective equipment must be used to safeguard employees' health.

**Mandatory use of respirators.** Site workers are required to wear respiratory protection and other personal protective equipment (PPE) when the following situations exist:

- There is potential exposure to air contaminants above a specific action or exposure limit;
- If respirators or PPE are necessary to protect employee health;
- During specific routine work practices, processes or tasks identified by the job hazard assessment or RWP as requiring use of a respiratory protection and PPE.

### **8.4 HEARING CONSERVATION PROGRAM**

The purpose of the Hearing Conservation Program is to protect personnel from occupational hearing loss due to excessive exposure to noise. In compliance with OSHA Standard 29 CFR 1910.95, the program provides requirements for medical monitoring (audiometric testing), noise monitoring of the work spaces, training, and selection, fitting and wearing of hearing protection devices.

### **8.5 ADDITIONAL WORK PLANS**

The process of developing a Work Plan provides engineering, design, and forethought into activities before those activities are performed, thereby making the actual work safer. Additional Work Plans that have been developed as part of the overall POP include:

#### **8.5.1 Interim Removal Action Work Plan**

The Interim Removal Action Work Plan (Interim RAWP) is the primary document to which the POP is attached. The purpose of the Interim RAWP is to define the individual activities required to accomplish the goals of the SOW for the Interim Work Period. The Interim RAWP presents a strategic framework to implement project activities during the Interim Work Period. The Interim RAWP describes the anticipated sequence, timing and scheduling of the project events

and deliverables. The Interim RAWP also includes a Critical Path Method (CPM) schedule for project milestones.

### **8.5.2 Emergency Response Plan**

The Emergency Response Plan (ERP) describes the procedures for responding to fire, medical and other emergency situations. The ERP will address the following topics:

- Emergency response plan and contingencies,
- Personnel roles and lines of authority,
- Emergency contacts and notification,
- Medical emergency response,
- Response to spills or leaks,
- Response to severe weather/natural disaster occurrences, including monitoring accumulation of snow on building roofs,
- Evacuation measures, and
- Adverse weather and natural disasters.

### **8.5.3 ARARs Implementation Plan**

The ARARs Implementation Plan addresses each of the requirements listed in the EE/CA, and will specify technical approaches to be used to comply with the applicable, relevant, and appropriate requirements for the NTCRA. Approaches to be described in the ARARs Implementation Plan include:

- Classification of materials into waste categories for disposal,
- Identification of hazardous wastes,
- Storage and disposal of hazardous wastes,
- RCRA documentation and recordkeeping,
- Procedures to be used for radiological decontamination of building surfaces,
- Procedures to be used for cleanup of PCB wastes and management of PCBs under TSCA,
- Packaging and transportation of hazardous and radioactive wastes,
- Prevention of radioactive emissions during removal actions,
- Prevention of asbestos emissions during removal actions,
- Surface water discharge and runoff, and
- Control and monitoring of particulate air emissions.

### **8.5.4 Field Sampling Plan**

The Field Sampling Plan (FSP) describes the technical approach and procedures to be used for the following activities:

- Pre-Demolition Survey, and
- Waste characterization activities for the development of Waste Acceptance Criteria.

The FSP provides the criteria to perform the site-specific investigations at each of the facilities to be demolished and will address sampling, quality assurance, quality control, analytical procedures and data management. Use of the FSP will help ensure that sampling data are scientifically valid, defensible and of known and acceptable quality.

### **8.5.5 Quality Assurance Project Plan**

The Quality Assurance Project Plan (QAPP) for the NTCRA has been prepared as an addendum to the existing RI QAPP. The QAPP Addendum provides NTCRA-specific project organization, objectives, activities, and QA procedures to be implemented during materials characterization testing and activities associated with the NTCRA, and supports all the sampling performed in the FSP described above.

### **8.5.6 Community Relations Support Plan**

The Community Relations Support Plan (CRSP) describes the public information and public involvement activities anticipated during the NTCRA, and the activities required to support the Agencies in their community relations efforts. The existing RI CRSP will be utilized until the NTCRA Work Plans are approved.

## **9.0 HEALTH AND SAFETY ZONES**

The Site Health and Safety Plan calls for the establishment of three types of work zones, as needed, when conducting field activities:

- Exclusion Zone (EZ) – any portion of the Site where hazardous substances are or are reasonably suspected to be present and pose an exposure hazard to on-site personnel conducting specific work activities.
- Contamination Reduction Zone (CRZ) – area between the EZ and support zone that provides a transition between contaminated and clean areas.
- Support Zone (SZ) – all areas of the Site except the EZ and CRZ. The SZ surrounds the CRZ and EZ. Support equipment, staging, and break areas are located in this zone.

Further details on the establishment of work zones is provided in the Site Health and Safety Plan.

## **10.0 NOTIFICATIONS**

Prior to commencing any subsurface intrusive activities, DigSafe utility locating service will be notified. The Dig Safe notification must be made a minimum of two full working days (not including the day the notice is provided) prior to the start of ground-intrusive activities, and is good for 30 days.



To the extent that interim activities require access to adjacent properties where the Respondents do not already have access approvals, the associated property owner(s) would be notified and approached for execution of an access agreement. Off-site property access is further discussed in Section 3 of this Interim SMSP.

Public notifications of key project milestones will also be made, as needed, consistent with the USEPA's community relations approach for this project. The Respondents' role in supporting such notifications will be determined in the NTCRA Work Plans.

## **11.0 DATA MANAGEMENT**

The NMI NTCRA project will utilize a secure web-based application created and hosted by ddms called Project Portal™. Project Portal is an online resource sharing platform which the team can utilize to view, download or upload project documents and data. Project Portal was specifically designed for use on large environmental projects involving many stakeholders. The system contains specialized modules for use by the team including Document Management, Project Calendar, query able Environmental Database, GIS (for mapping) and Project Tables.

Authorized users will be able to query, trend and map historic and contemporary physical, analytical and field measurement data within the Project Portal system. For advanced needs, data are easily exported to one of several common file types (e.g., ESRI® Shapefile, GoogleEarth® KML, Microsoft Excel®, Text File and EQUIS® "4-File Format"). Coordinates of all sample locations will be made available to the project team through the "Sample Location" summary table. This table will be kept up-to-date as the project progresses, at any point users may export the locations and associated coordinates into a downloadable Excel file.

### **11.1 ANALYTICAL DATA**

In addition to accessing actual data, project team members will be able to log into the Project Portal system and view analytical data delivery progress by sample delivery group (SDG) through a SDG tracking table. The data management coordinator, i.e., ddms, will be responsible for checking boxes to communicate when the following have happened:

1. Lab report and associated electronic data deliverable (EDD) are received by ddms via email from the lab.
2. Data have been imported into the environmental database and have undergone basic data QA/QC exercise in a preliminary format. Each record will be clearly marked as "UNVALIDATED" at this point and will be available for the team to utilize as such.
3. Data have been validated. "UNVALIDATED" will be replaced by the date validated and the personnel who performed the validation. Any changes to the lab-issued qualifiers and/or results will also be recorded and distributed with the data.

The data management coordinator will coordinate with the contract lab to create EDD files per the GEMS v6 specification which the lab will use to issue digital (see QAPP, Attachment C to the RD POP, for GEMS v6 Data Dictionary). Besides being recorded in the SDG tracking table, a digital

copy of the lab report, chain of custody and EDD will be posted to the Document Management Module in Project Portal for archival and backup purposes after analytical results are issued by the lab.

### **11.2 FIELD MEASUREMENT DATA**

The data management coordinator will issue field data spreadsheet templates to project team members for the purposes of streamlining the process of moving measurement values from the field into the project environmental database. One field data spreadsheet will be filled out per field sampling event and posted to a designated location within Project Portal Document Management Module for archival and data transportation purposes, i.e., ddms personnel will obtain the field data spreadsheets from the Document Management Module.

Field data will then be imported into the project environmental database. Once there, project team members will be able to query it out and manipulate as along with the analytical data.

### **12.0 PERIMETER AIR MONITORING PLAN**

SOW Section II.B.1. indicates that the SMSP should include provisions for monitoring airborne contaminants released by NTCRA activities that could affect local populations. Considering the minimally intrusive nature of the interim NTCRA activities, the lack of potential receptors in the immediate proximity of the work, and the fact that work-zone air monitoring will be performed by site personnel consistent with the requirements of the HASP; a perimeter air monitoring program is not anticipated to support interim NTCRA activities. To the extent that such monitoring may be appropriate for larger-scale site work to be performed as part of the NTCRA, e.g., demolition, plans for a perimeter monitoring program will be developed and included with the appropriate NTCRA-related submittals.

### **13.0 WASTE STREAM MANAGEMENT**

As discussed in the HASP, off-site disposal of waste material generated during Interim NTCRA activities will be coordinated with the appropriate parties according to the properties of the waste material. The following table summarizes potential Interim NTCRA-related waste streams and the management approach for each:

<b>Waste Stream Description</b>	<b>Management Approach</b>
Used personal protective equipment (PPE)	PPE will be removed in the CRZ, placed within plastic bags in accordance with the HASP, and labeled for proper characterization and storage until the NTCRA Work Plans are approved.
Decon Fluids	Accumulated wash water collected during equipment decontamination will be containerized for subsequent treatment using a temporary on-site treatment plant.

Waste Stream Description	Management Approach
Rain Water	Accumulated rain water collected during equipment decontamination will be containerized for subsequent treatment using a temporary on-site treatment plant.
Decon Pads	Polyethylene sheeting used in the construction of decon pads will be containerized pending disposal.

All drums will be staged in an appropriate area within the CRZ and labeled appropriately based on the contents of the drum. It is anticipated that waste streams that require off-site disposal will be stored on-site until the approval of the NTCRA Work Plans.

For the purposes of waste disposal, *de maximis* will be considered the generator of any off-site waste shipments. *de maximis* will be responsible for signing all manifests.

## 14.0 PROJECT REPORTING AND OVERSIGHT

### 14.1 REQUIREMENTS OF THE STATEMENT OF WORK

The following are the oversight requirements, as stated in the SOW:

1. Respondents shall attend an on-site pre-construction walk through with USEPA and its representatives prior to site mobilization.
2. Respondents shall hold construction meetings a minimum of once per month during on-site work with USEPA and its representatives and provide work-related information requested by USEPA at these meetings.
3. In addition to the monthly construction meetings, Respondents shall attend other meetings requested by USEPA involving air monitoring, stormwater, project safety or transportation and disposal.
4. Respondents shall allow USEPA and its representatives to observe all aspects of the work and conduct a site walk with USEPA prior to demolition of any structure or building. The purpose of the site walk is to ensure that Respondents have completed the removal of hazardous or regulated material from the structure or building prior to demolition, and that such structure or building is ready for demolition. Respondents shall not begin demolition until receipt of USEPA's written approval to proceed.
5. Respondents shall attend a pre-Final Report inspection with USEPA and its representatives to identify unresolved issues that need to be addressed prior to submittal of the draft Final Report.

### 14.2 PROJECT REPORTING

The Site Operations Manager will keep track of the following on a daily basis:

1. Tasks performed,

2. Subcontractors at the Site and tasks assigned,
3. Daily and cumulative work hours performed to date (including subcontractor personnel),
4. List of official visits to the Site (Agencies, clients, community groups, etc.), and
5. Additional notes on safety issues, incidents, etc.

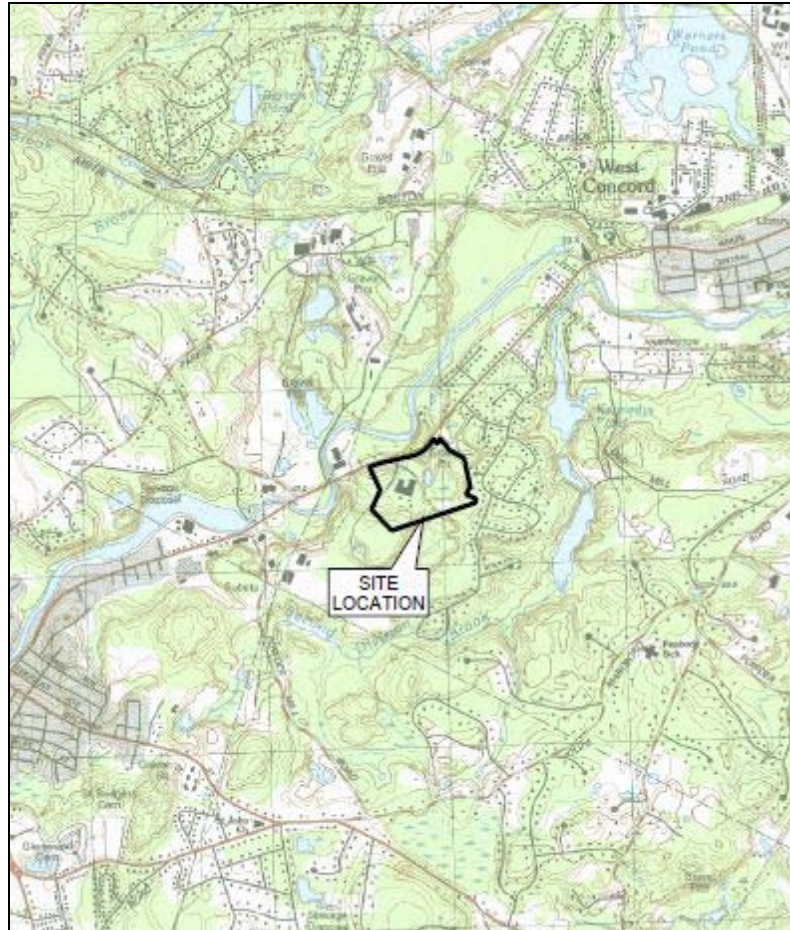
Monthly Progress Reports will be completed and issued by the Project Coordinator. These reports, as required by the Settlement Agreement, will include:

1. All significant developments during the preceding period,
2. Actions performed and problems encountered,
3. Analytical data received during the preceding period,
4. Developments anticipated during the next reporting period, and
5. Anticipated problems and planned resolutions for any problems.

A Final Report will be prepared in accordance with Paragraph 42 of the Settlement Agreement, to include:

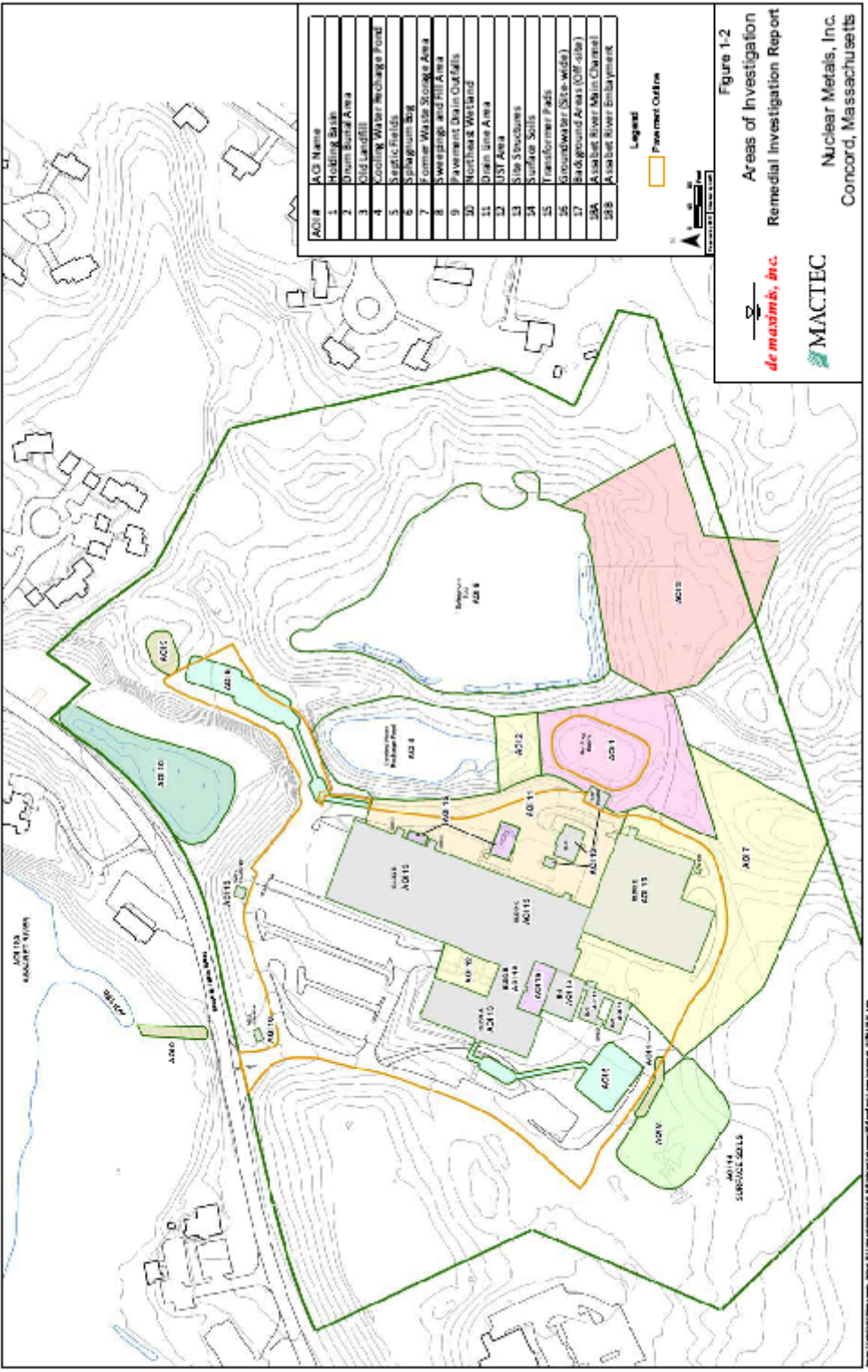
1. An as-built survey showing the condition of the Site at completion of the NTCRA, including, but not necessarily limited to, the following:
  - a topographical survey showing final as-built surface grades throughout the work area;
  - the location of the building foundation(s) left in place;
  - the locations of the cover(s);
  - the locations of all groundwater wells;
  - the location of all operating subsurface features left in place such as catch basins, storm drains and similar utility related subsurface features retained to provide post-demolition storm water management to the extent practicable;
  - the locations of all live fire hydrants in or adjacent to the Site; and
  - any other significant site features including but not limited to drainage swales and lines, fencing left in place, abutting parking lots.
2. A summary of all procedures used (in chronological order).
3. Tabulation of analytical data prepared during the course of the NTCRA including: summaries of verification sampling results, waste profiling results, air monitoring data, and any other data collected during the NTCRA; QA/QC documentation of these results; and conclusions regarding compliance with the ARARs Implementation Plan.

## FIGURES



**Figure 1-1 Site Location**





AOI #	AOI Name
1	Holding Basin
2	Drum Storage Area
3	Old Landfill
4	Existing Water Recharge Pond
5	Sepic Tanks
6	Sludge Storage
7	Concrete Waste Storage Area
8	Swearing and Fill Area
9	Pavement Drain Outfalls
10	Northwest Wetland
11	Drain Line Area
12	UST Area
13	Site Structures
14	Surface Soils
15	Transformer Pads
16	Groundwater (Site-wide)
17	Back ground Areas (Off site)
18A	Stable River Main Channel
18B	Stable River Embankment

Legend  
 Perimeter Outline

Figure 1-2  
**Areas of Investigation**  
 Remedial Investigation Report  
 de mactec, inc. MACTEC  
 Nuclear Metals, Inc.  
 Concord, Massachusetts



