

APPENDIX J

STATEMENT OF WORK FOR OPERABLE UNIT 2

STATEMENT OF WORK

for the

REMEDIAL ACTION

GREEN RIVER DISPOSAL LANDFILL

SUPERFUND SITE

DAVISS COUNTY, KY

OPERABLE UNIT TWO



REGION 4

ATLANTA, GEORGIA

STATEMENT OF WORK
for the
GREEN RIVER DISPOSAL LANDFILL SUPERFUND SITE
REMEDIAL ACTION

OPERABLE UNIT TWO

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**STATEMENT OF WORK
for the
GREEN RIVER DISPOSAL LANDFILL SUPERFUND SITE
REMEDIAL ACTION**

OPERABLE UNIT TWO

I. INTRODUCTION

This Statement of Work (SOW-2) outlines the Remedial Action work for Operable Unit Two to be performed by the Settling Performing Parties at the Green River Disposal Landfill Superfund Site, in Daviess County, Kentucky (the Site). The work outlined herein is intended to fully implement the remedy as described in the Operable Unit 2 (OU-2) Record of Decision (ROD-2) for the Site, dated August 23, 2000. The requirements of this SOW-2 will be further detailed in work plans and other documents to be submitted by the Settling Performing Parties for approval as set forth in this SOW-2. It is not the intent of this document to provide task specific guidance.

Settling Performing Parties are responsible for performing the work required by the selected remedy for OU-2. EPA expects the Settling Performing Parties to propose an outline for implementation of the proprietary institutional control required by ROD-2. EPA will require the Settling Performing Parties to submit a work plan for groundwater monitoring to be conducted under the routine operation and maintenance for the landfill. EPA will conduct oversight of the Settling Performing Parties' activities throughout the performance of this work, and the Settling Performing Parties shall assist EPA in conducting any necessary community relations activities. A summary of the major deliverables that Settling Performing Parties shall submit for the work is described in this SOW-2.

II. OBJECTIVES OF THE REMEDY

The general objectives of the Landfill (OU-1) remedy are:

1. Prevent or mitigate the continued release of hazardous substances, pollutants and contaminants at the Site to surface water, and sediments;
2. Eliminate or reduce the risks to human health associated with direct contact with hazardous substances, pollutants or contaminants within the Site;
3. Eliminate or reduce the risks to human health from inhalation of hazardous substances, pollutants or contaminants from the Site;

4. Eliminate or minimize the threat posed to human health and the environment from potential migration of hazardous substances to the groundwater, surface and subsurface soils.

The general objectives of the Groundwater (OU-2) remedy are:

1. Prevent/eliminate direct human exposure to groundwater
2. Prevent/eliminate activities that are detrimental to the integrity of the landfill cover system, and therefore, further protect groundwater from a potential future landfill release.

III. SUMMARY OF THE REMEDY

A. Components

The remedy for Operable Unit Two outlined in the ROD-2, includes the following components:

1. A property easement or covenant shall be established to provide for the following:
 - Prohibit construction of any on-site water supply wells and/or irrigation wells;
 - Prohibit construction of any type on the landfill cap or within 50 feet of the cap. To ensure that the integrity of the cover system will remain intact and continue to protect groundwater from a release of leachate, these restrictions will also include prohibition of any activities on the landfill cap that may damage, alter in any fashion (such as planting ornamental landscaping) or otherwise be detrimental to the landfill cover system.
2. On-site groundwater shall be monitored as part of routine operation and maintenance of the landfill to determine the performance of the landfill cover and leachate collection system (OU-1). The data will be used to detect changes in the condition of the groundwater that may indicate a problem with the landfill cover system. A Groundwater Monitoring Plan shall be submitted for EPA review and approval.

B. Performance Standards

Settling Performing Parties shall meet the requirements outlined in the Consent Decree and ROD-2 for establishment of a property easement or other appropriate institutional control running with the land. The easement or other appropriate institutional control shall provide the grantee the right to enforce the land and water use restrictions consistent with the easement or other appropriate institutional control. The Settling Performing Parties shall also attach a notice to the property deed explaining the Site's history, the current Site condition (as of the date of the notice) and the prohibitions on construction and groundwater use.

Settling Performing Parties shall initiate implementation of the approved Groundwater Monitoring Plan for OU-2.

Successful completion of these actions shall constitute full compliance with the performance standards for the Operable Unit 2 remedy.

IV. PLANNING AND DELIVERABLES

Remedial Design/Remedial Action

The specific scope of this work shall be performed by the Settling Performing Parties in accordance with the requirements of the Consent Decree. Settling Performing Parties shall submit to EPA and the State a Remedial Design/Remedial Action Work Plan for OU-2 which shall consist of: 1) an Institutional Control Plan for implementing the required institutional controls; 2) a Groundwater Monitoring Plan; and schedules for implementing both Plans.

A. The Institutional Control Plan shall include the following:

- a description of the institutional controls to be implemented and their objectives;
- an overview of the ownership status of the property and status of Green River Disposal Inc.;
- an outline of the strategy proposed to accomplish the task of implementing the institutional controls;
- a discussion of the likely barriers to implementation of the Institutional Control Plan that may be encountered;
- a description of a contingency plan that may be implemented if the primary conceptual plan fails;
- a schedule for completing the work; and

- a draft easement or other appropriate institutional control for review and approval by EPA and the State.

The OU-2 Institutional Control Plan shall be submitted to EPA no later than sixty (60) days following the effective date of the Consent Decree.

B. A Groundwater Monitoring Plan shall be submitted to EPA for review and approval, containing the following elements:

- identification of the constituents to be analyzed which shall include the four contaminants of concern (COCs) identified in the ROD-2 and other compounds or elements determined to be necessary to monitor the performance of the landfill cover system;
- the groundwater monitoring locations;
- a sampling frequency to provide sufficient data for establishing groundwater trends that may be used to show any potential problems with the integrity and effectiveness of the landfill cover system;
- monitoring plan for the leachate to develop trends on contaminants released from the landfill and for comparison to groundwater trends. Leachate must be analyzed for the groundwater COCs and for constituents characteristic of the landfill contents. Data related to the performance of the leachate collection system shall also be obtained and evaluated on an annual basis; and
- a schedule for completing the work.

The Groundwater Monitoring Plan shall be submitted to EPA no later than one hundred and twenty days (120) following the effective date of the Consent Decree.

Certification of Completion of the Remedial Action for OU-2

Ninety days (90) after successful completion of all of the tasks outlined in the approved Remedial Design/Remedial Action Work Plan, the Settling Performing Parties shall submit to EPA and the State a Remedial Action Report (RAR). The RAR shall outline all of the activities conducted under the Consent Decree and provide documentation that an easement or other appropriate institutional control, in accordance with the OU-2 Record of Decision and Consent Decree, has been recorded for the Site.

The RAR shall contain (but not be limited to) the following elements:

- a chronological account of the actions undertaken pursuant to the OU-2 Record of Decision and Consent Decree;
- identification of the property owner(s) and description of the property boundaries
- description of the site boundary;
- an organizational chart identifying companies and/or individuals responsible for operating and maintaining the site;
- description of the future relationship between the Settling Performing Parties, the on-site operation and maintenance contractor; and the owner of the property(ies);
- a discussion concerning site access, including how it will be controlled and who will control it;
- a copy of the easement or covenant recorded for the property, and all other informational, governmental, or proprietary institutional controls issued for the site.

The RAR shall contain a statement by a responsible corporate official of a Settling Performing Party and the Settling Performing Parties' Project Coordinator that the Remedial Action for OU-2 has been completed in full satisfaction of the requirements of the Consent Decree. EPA acceptance and approval of the Remedial Action Report will establish and certify completion of the Remedial Action for OU-2 in accordance with the Consent Decree.

V. SUMMARY OF THE MAJOR DELIVERABLES

Settling Performing Parties shall provide EPA and the State two (2) copies each of each deliverable as required by the Consent Decree unless otherwise directed by the EPA Remedial Project Manager.

Remedial Design/Remedial Action Work Plan: Draft and final copy of the Remedial Design/Remedial Action Work Plan, including an Institutional Control Plan with draft easement and Groundwater Monitoring Plan;

Remedial Action Report: Draft and final copy

VI. REFERENCES

The following list, although not comprehensive, comprises many of the regulations and guidance documents that apply to the RD/RA process. Settling Performing Parties shall review these guidance and use the information provided therein in preparing all deliverables required by this SOW-2.

1. "Institutional Controls: A Site Managers' Guide to Identifying, Evaluating and Selecting Institutional Controls at Superfund and RCRA Corrective Action Cleanups," U.S. EPA Office of Solid Waste and Emergency Response, September 2000, OSWER 9355.0-74FS-P (EPA 540-F-00-005).
2. "National Oil and Hazardous Substances Pollution Contingency Plan, Final Rule", Federal Register 40 CFR Part 300, March 8, 1990.
3. "Superfund Remedial Design and Remedial Action Guidance," U.S. EPA, Office of Emergency and Remedial Response, June 1986, OSWER Directive No. 9355.0-4A.
4. "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.
5. "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.
6. "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.
7. "Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans," U.S. EPA, Office of Emergency and Remedial Response, QAMS-005/80, December 1980.
8. "Users Guide to the EPA Contract Laboratory Program," U.S. EPA, Sample Management Office, August 1982.
9. "Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual," U.S. EPA Region 4, Environmental Services Division, February 1, 1991, (revised periodically).
10. "USEPA Contract Laboratory Program Statement of Work for Organics Analysis," U.S. EPA, Office of Emergency and Remedial Response, February 1988.
11. "USEPA Contract Laboratory Program Statement of Work for Inorganics Analysis," U.S. EPA, Office of Emergency and Remedial Response, July 1988.

12. "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.
13. "Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites," U.S. EPA, Office of Emergency and Remedial Response, (Draft), OSWER Directive No. 9283.1-2.
14. "Health and Safety Requirements of Employees Employed in Field Activities," U.S. EPA, Office of Emergency and Remedial Response, July 12, 1981, EPA Order No. 1440.2.
15. "Standard Operating Safety Guides," U.S. EPA, Office of Emergency and Remedial Response, November 1984.
16. "Standards for General Industry," 29 CFR Part 1910, Occupational Health and Safety Administration.
17. "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.