

STATEMENT OF WORK

PREPARATION AND REVIEW OF ENVIRONMENTAL REMEDIATION REGULATORY DOCUMENTATION, I.E. AN ENVIRONMENTAL IMPACT STATEMENT FOR AREA IV OF THE SANTA SUSANA FIELD LABORATORY AND RELATED ENVIRONMENTAL DOCUMENTATION

1.0 INTRODUCTION

- 1.1 This is a Firm-Fixed-Price (FFP) Task Order issued under the Indefinite Delivery Indefinite Quantity (IDIQ) Contract DE-AM09__05SR22XXXX, CLIN 001. The purpose of the task order is for the task order contractor (contractor) to provide environmental remediation services including the preparation of regulatory documentation associated with environmental remediation, i.e., an Environmental Impact Statement (EIS), to evaluate the potential environmental impacts associated with environmental restoration and waste management activities for closure of the former Energy Technology Engineering Center (ETEC). The EIS will also analyze environmental restoration activities for site-wide soil and groundwater remediation, and the decontamination and decommissioning or dismantlement of government buildings and structures. Waste management activities (which are not part of the scope of this task order) include operation, maintenance and closure of Resource Conservation Recovery Act (RCRA) permitted facilities. The facilities that are to be included in the EIS include former radiological facilities, former sodium facilities, and administrative facilities.

The EIS shall be prepared in accordance with the Council of Environmental Quality's National Environmental Policy Act (NEPA) Implementing Regulations and the DOE NEPA Implementing Procedures.

A Notice of Intent will be published in the Federal Register announcing DOE's intent to prepare an EIS and hold public meetings to hear issues to be considered in the scope of an EIS for the remediation of Area IV.

- 1.2 The Santa Susana Field Laboratory (SSFL) is located atop a range of hills between the Simi and San Fernando Valleys, north of Los Angeles in Ventura County, California. The SSFL is owned and operated by The Boeing Company. The SSFL is divided into four administrative areas—Area I, Area II, Area III and Area IV. A 42 acre portion of Area I and all of Area II (404 acres), are owned by the Federal Government administered by the National Aeronautics and Space Administration (NASA) and operated by The Boeing Company. Areas I and III are operated and mostly owned by The Boeing Company. Areas I and III total 791 acres. The Boeing Company also owns a contiguous buffer zone of 1143 acres to the south and a contiguous buffer zone of 182 acres to the north. The westernmost 290 acres of the site,

known as Area IV, and is owned and operated by The Boeing Company for DOE. Area IV was used primarily for research and component testing in nuclear, solar and geothermal energy development. The Energy Technology Engineering Center (ETEC) occupies about 90 acres within Area IV and is owned by DOE. ETEC presently includes buildings which house test apparatus for large scale heat transfer and fluid mechanics experiments, mechanical and chemical test facilities, office buildings, and auxiliary support facilities. ETEC is surplus to the DOE's current mission and is undergoing closure prior to returning use of ETEC to The Boeing Company. The site had numerous facilities, including some where chemical and radioactive substances were used. Contamination may exist in structures and the physical media including soils, surface and groundwater.

- 1.3 DOE issued an Environmental Assessment (EA) (DOE/EA-1345), Environmental Assessment for Cleanup and Closure of Energy Technology Engineering Center in 2003. The Department issued a Finding of No Significant Impact (FONSI) that determined that DOE would implement its preferred alternative of cleaning up radiological facilities and surrounding soils to a 15 millirem exposure per year standard plus As Low As Reasonably Achievable (ALARA). DOE determined that implementation of this alternative would be fully protective of future users of the site and did not significantly affect the quality of the human health or the environment within the meaning of NEPA. DOE decided not to prepare an EIS.
- 1.4 On May 2, 2007, the U.S. District Court for the Northern District of California (*Natural Resources Council et al. v. DOE et al.*) directed DOE to complete an EIS and Record of Decision (ROD) for Area IV of SSFL.

2.0 BACKGROUND

- 2.1 NEPA is our basic national charter for the protection of the environment. It establishes policy, sets goals, and specifies the process for carrying out the policy. In part, NEPA states that all federal agencies shall "utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decisionmaking which may have an impact on man's environment." NEPA, at section 102(2)(C), requires Federal agencies to include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement known as an EIS on: "(i) The environmental impact of the proposed action, (ii) Any adverse environmental effects which cannot be avoided should the proposal be implemented, (iii) Alternatives to the proposed action, (iv) The relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and (v) Any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented."

- 2.2 The Council on Environmental Quality's (CEQ's) NEPA implementing regulations, at 40 CFR §§1500-1508, are binding on all Federal agencies, and establish the minimum general requirements that assure NEPA compliance. These CEQ regulations establish a multistage process that describes how the agency is to analyze and describe to the public and the decision maker any significant environmental impacts that could result from carrying out a proposed action.
- 2.3 DOE has adopted additional binding agency-specific NEPA regulations that describe in greater detail how the agency will implement the requirements in the CEQ regulations. DOE's implementing regulations are published at 10 CFR § 1021.
- 2.4 The CEQ regulations at 40 CFR § 1502.10 provide a format for an EIS: (a) cover sheet, (b) summary, (c) table of contents, (d) purpose of and need for action, (e) alternatives, including the proposed action (sections 102(2)(C)(iii) and 102(2)(E) of NEPA), (f) affected environment, (g) environmental consequences (especially sections 102(2)(C) (i), (ii) (iv), and (v) of NEPA), (h) list of preparers, (l) list of agencies, organizations, and persons to whom copies of the EIS are sent, (j) index, (k) appendices (if any). The Contractor shall use this format in preparation of the Area IV EIS.
- 2.5 The sections of the Area IV EIS that describe the "purpose and need for agency action" and the "alternatives including the proposed action" will be written by DOE and provided to the Contractor. The proposed actions and range of alternatives to the proposed actions may change during document preparation as the result of further consideration, public comment, or external developments. All other portions of the EIS as prepared by the Contractor are subject to independent review and verification of data and analyses by DOE.
- 2.6 EIS preparation requires an interdisciplinary approach that integrates use of the natural, physical, and social sciences and the environmental design arts. The preparers' disciplines must be appropriate to the identified scope and issues. For the Area IV EIS, the expertise needed in the NEPA document preparation team would include but is not limited to: waste treatment, management, and disposal; nuclear physics, radiation safety, health physics, various fields of engineering, surface and groundwater hydrology and water quality, geology and seismicity, air quality and meteorology, radioactive and chemical contaminant transport, traffic and transportation safety, terrestrial and aquatic ecology, radioecology, land use management, endangered species biology, soil science, wetland management, water resource planning, paleontology, archaeology and cultural resources, utility and infrastructure design, occupational and public health and safety, noise, socioeconomics, visual resources, recreation, landscape architecture, environmental justice, modeling, statistical analysis, and risk assessment, including analysis of

accidents and intentional destructive acts. The Contractor should know the requirements for environmental review under the California Environmental Quality Act (CEQA).

- 2.7 The EIS is being prepared for Area IV of the SSFL pursuant to an order from the United States District Court of the Northern District of California. The site also has significant interest from the general public, Federal and state regulatory agencies, and stakeholder groups, The EIS will be subject to rigorous review by each of the before-mentioned groups.

3.0 SCOPE

The objective of the SOW is to provide environmental remediation services, i.e. the preparation of an EIS for Area IV of the SSFL pursuant to Council on Environmental Quality regulations (40 CFR Part 1500) and DOE NEPA implementing procedures (10 CFR Part 1021).

The EIS will describe the remediation of Area IV through continuation of current action plans and alternatives to them and analyze the impacts to the environment, workers and the public. Action alternatives that meet the purpose and need for restoration and closure will also be described and analyzed for their environmental consequences. Environmental effects analyses will be conducted in the following areas: surface water and groundwater contamination and hydrology, soil contamination and geology, airborne contamination, ecological resources (endangered species and wetlands), waste management, transportation, socioeconomic, environmental justice, cultural and paleontological resources, and facility decontamination and decommissioning. Cumulative impacts will be analyzed to determine significance and effect on the environment, both on and off-site from Area IV. Mitigation measures which will avoid or mitigate potentially significant environmental impacts will be described.

The Contractor shall furnish all labor, materials, equipment, facilities, transportation, and incidentals necessary to perform in accordance with this statement of work.

4.0 APPLICABLE DOCUMENTS

The Contractor shall adhere to the following statutes, regulations, and guidance, as applicable. This list is not comprehensive. If relevant, the NEPA Document Manager will provide the Contractor with applicable NEPA internal scoping procedures, public participation plan(s) and quality assurance plan(s), and other regulatory and guidance documents.

Statutes

- National Environmental Policy Act of 1969, as amended
- Endangered Species Act of 1973, as amended
- National Historic Preservation Act, as amended
- Clean Air Act, as amended

Regulations

- Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR Parts 1500-1508)
- U.S. Department of Energy National Environmental Policy Act Implementing Procedures (10 CFR Part 1021)
- U.S. Department of Energy Compliance with Floodplain/Wetlands Environmental Review Requirements (10 CFR Part 1022)
- Interagency Cooperation, Endangered Species Act of 1973, as amended (50 CFR Part 402)
- Protection of Historic Properties (36 CFR Part 800)
- General Conformity Regulations (40 CFR Part 93, Subpart B)

Executive Orders

- EO 11988: Floodplain Management
- EO 11990: Protection of Wetlands
- EO 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

DOE Orders

- DOE O 450.1B, National Environmental Policy Act Compliance Program

Guidance

- Council on Environmental Quality "Forty Most Asked Questions" (46 Fed. Reg. 18026, March 23, 1981) and supplemental guidance (48 Fed. Reg. 18026, July 23, 1983)
- U.S. Department of Energy, NEPA Compliance Guide, Volumes I , II, III (2005)
- U.S. Department of Energy, NEPA Web Site at www.eh.doe.gov/nepa/ (which includes many of the references listed in this section of the statement of work).
- U.S. Department of Energy, Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements, Dec 2004

Standards and Guidance

- U.S. Department of Energy, Crosscut Guidance for Environmental Requirements for DOE Real Property Transfers, DOE EH/413/8712 (<http://homer.ornl.gov/nuclearsafety/nsea/oepa/guidance/rcra/property.pdf>)

Drivers for Completion of the EIS

- United States Court Order Northern District of California, Natural Resources Defense Council, Inc., Committee to Bridge the Gap, and the City of Los Angeles v Department of Energy Spencer Abraham, Secretary, Department of Energy, Camile Yuan-Soo Hoo, Manager, National Nuclear Security Administration, Oakland Operations Office
- Department of Toxic Substances Control (DTSC) Draft Consent Order for Corrective Action

5.0 TECHNICAL REQUIREMENTS

Technical direction for preparation of the EIS will be provided by the COR which will be a designated DOE NEPA Document Manager and/or the Contracting Officer.

- 5.1 The Contractor shall comply with DOE and site safeguards and security requirements to obtain entry to DOE facilities and site facilities. The Contractor shall comply with DOE and site environment, safety and health requirements.
- 5.2 Unless otherwise provided, the Contractor shall provide its own office space.
- 5.3 The Contractor shall use Microsoft Word, for the preparation of all deliverable documents. Software used for analyses and modeling may be proprietary but calculations obtained from applying such software must be provided to the NEPA Document Manager.
- 5.4 The Contractor shall prepare a project management plan based on the Scope of Work description and/or NEPA Document Checklist. The project management plan shall be prepared after DOE provides the statement of purpose and need, and will be reviewed and revised by the Contractor as necessary at the two following stages: (a) with the preliminary draft document, and (b) with the preliminary final document. The project management plan shall identify whether and how each task element is addressed in the document. DOE may use the NEPA Document Checklist to verify whether all elements of the Scope of Work are identified and appropriately addressed.
- 5.5 The Contractor shall implement a formal change control process and prepare a cost report that identifies the cost of a draft EIS and the basis of the cost estimates. Each revision of the cost report will be submitted to DOE for review so that the incremental costs of changes and corrections may be tracked. The basis of the cost estimates should include such categories as approach, cost assumptions, cost elements, direct labor, fringe benefits, direct costs, overhead, travel, general and administration, purchased equipment, purchased material, subcontracts, cost of facilities capital, inflation factor, etc.

- 5.6 If necessary, DOE will provide to the Contractor or assist in obtaining existing information, such as the Environmental Assessment for Cleanup and Closure of the Energy Technology Engineering Center, DOE/EA-1345 and other existing environmental data and baseline information, pertinent to the task. The Contractor shall ensure that its personnel have interdisciplinary areas of expertise as applicable to independently assess the adequacy and completeness of this information bring data gaps, omissions, and inconsistencies to the attention of DOE and, if required, conduct additional data collection under a data collection plan approved by the NEPA Document Manager. The schedule and budget may be modified by DOE as determined appropriate by the contracting officer. The Contractor shall maximize the use of existing programmatic, environmental, and safety documents to prepare the EIS.
- 5.7 The Contractor shall coordinate with DOE on acceptable levels of data analysis and on assumptions, analytical methods, and models. The Contractor shall present an analysis and quality assurance plan to the NEPA Document Manager for approval. The Contractor may be required to participate in teaming arrangements with DOE and other Contractors, or cooperating federal or state agencies.
- 5.8 The Contractor shall integrate data and analysis supplied by DOE, DOE contractors, DOE Area IV contractors, cooperating or assisting agencies, other federal agencies, state, tribal and local government entities who may be asked by DOE to provide input or information in specialized areas of jurisdiction or expertise.
- 5.9 The Contractor shall identify and analyze the onsite and offsite environmental impacts of the proposed action and each of the alternatives in the EIS. This may include but not be limited to: conducting literature searches; modeling; preparing graphs, maps, charts and tables; calculating; interpreting samples; interviewing experts; and documenting such research, analyses, or use of professional judgment in the absence of preexisting information.
- 5.10 The Contractor shall prepare a draft and final EIS and compile the associated Administrative Record (AR) file. The order and categorization of the AR documents shall be according to a system specified by DOE. The content of the AR file will be specified by the NEPA Document Manager and the AR file shall be compiled and maintained by the Contractor in accordance with relevant DOE Orders concerning records management. The Contractor shall keep the AR file current with the development of the EIS. The AR file will include such things as materials which reflect significant changes in thinking on the project, that is, memoranda that raise important issues or criticize the assumptions or approaches or conclusions, all formal published agency notices and documents and comments, original copies of field notes,

reference documents, studies, model runs, supporting analyses, photographs, graphics, and maps used in the preparation of the EIS. The AR file for the EIS is the property of DOE. The NEPA Document Manager and/or contracting officer may direct the Contractor to transfer the AR file to DOE at any time during the EIS preparation process and the Contractor shall comply within five days of notification.

- 5.11 The Contractor shall identify and describe mitigation measures and prepare a draft mitigation action plan. During the course of the analysis for the EIS, it may become apparent that mitigation could reduce, avoid, eliminate, or compensate for the environmental impacts of a proposed action or alternative. If the analyses indicate the potential for such mitigation, the Contractor shall identify mitigation measures for DOE to consider incorporating into the proposed action, an alternative, or a mitigation action plan.
- 5.12 In the preparation of the EIS, the Contractor may be required to support DOE in interactions with federal, state and local agencies, tribes, interested organizations, and the public. This support may include assisting DOE in consulting with federal or state agencies and organizations such as the U. S. Fish and Wildlife Service, National Park Service, Army Corps of Engineers, and Advisory Council on Historic Preservation regarding compliance with laws, regulations, licensing and permitting protocols, and other requirements. The support may also include assisting DOE in consulting with state agencies concerning permit requirements and with tribes concerning land use, treaty, or cultural issues.
- 5.13 The Contractor shall provide support to DOE in developing and implementing a public participation plan for the EIS. This support may include routine and special mailings, preparing presentation materials, establishing and staffing a toll-free telephone line, and other forms of communication.
- 5.14 The Contractor shall provide support and/or participate in team meetings, public scoping meetings, information meetings, and public hearings on the EIS. The NEPA Document Manager will designate the locations of the meetings or hearings and the Contractor shall provide support such as make arrangements for the facility, date, and time for each meeting or hearing; provide publicity, moderator, assist in preparing written instructions for hearing officials, including opening and closing statements, if necessary; assist with preparing presentation materials; and provide timely distribution of transcripts and written comments to public reading rooms and interested parties.

- 5.15 Preliminary Draft: The Contractor shall prepare a preliminary draft EIS for internal DOE review and shall participate in such review as required. The Contractor shall support the compilation, tracking, answering, and resolution of comments on the preliminary draft of the EIS and make revisions.
- 5.16 Draft: The Contractor shall prepare a draft EIS that includes corrections, revisions, additions, and deletions based on comments received on the preliminary draft. The Contractor shall identify and track comments and related text changes. The Contractor shall provide copies of a draft EIS to the NEPA Document Manager for DOE internal distribution and approval.
- 5.17 Draft EIS (printed): The Contractor shall prepare a camera-ready copy and/or electronic file of a draft EIS suitable for printing by the Government Printing Office, as well as a web-ready version, and deliver the copy at a time and place designated by the NEPA Document Manager. The NEPA Document Manager may direct the Contractor to procure printing through the Government Printing Office [Public Law 102392, Section 207(a)(1)].
- 5.18 Draft EIS (copies): The Contractor shall make 50 copies of the draft EIS along with a CD version.
- 5.19 The Contractor shall assist in the preparation of news releases, fact sheets, Q&As, and transmittal letters and support the distribution of a draft EIS by packaging and mailing to appropriate state and Federal agencies, Congress, Federal or state elected officials, and other interested parties.
- 5.20 The Contractor shall categorize, collate, and assist DOE in analyzing comments received on a draft EIS during the comment periods. The Contractor shall assist in the preparation of draft responses to all comments for incorporation into the final EIS and shall identify and prepare necessary revisions, or conduct further analyses based on those comments.
- 5.21 Preliminary final: The Contractor shall prepare a preliminary final of the EIS that incorporates any additional technical data received after publication of the draft, and any revisions resulting from comments on the draft, compile, track and answer, any DOE comments on the Preliminary Final EIS, and copy and distribute 20 copies for internal DOE review along with a CD version.
- 5.22 Final: The Contractor shall prepare copies of a final EIS that include corrections, revisions, additions, and deletions based on comments received on the preliminary final. The Contractor shall identify and track comments and related text changes. The Contractor shall provide 20 copies of a final EIS to the NEPA Document Manager for internal DOE distribution and approval along with a CD version.

- 5.23 Final (printed): The Contractor shall prepare a camera-ready copy and/or electronic file of a final EIS suitable for printing by the Government Printing Office and deliver the copy at a time and place designated by the NEPA Document Manager. The NEPA Document Manager may direct the Contractor to procure printing through the Government Printing Office [Public Law 102392, Section 207(a)(1)].
- 5.24 Final (copies): The Contractor shall make copies of a final EIS in the number specified by the NEPA Document Manager. The estimated number of copies needed is 50 along with a web-ready copy and a CD version.
- 5.25 The Contractor shall assist in preparing draft press releases and draft transmittal letters and support their distribution, for example, by packaging and distributing a final EIS to appropriate Federal and state agencies, Federal and state elected officials, and interested parties.
- 5.26 The Contractor shall provide data collection and analysis/evaluation, for other environmental tasks. The Contractor shall provide supporting documentation in draft, respond to comments, prepare finals as required, and support DOE in compliance with applicable requirements.
- 6.0 DELIVERABLES
- Unless otherwise specified, deliverables shall be provided to the NEPA Document Manager for review/approval. The Contractor shall:
- 5.1 Provide a project management plan, data collection plan, analysis and quality assurance plan and public participation plan, at the beginning of the task, and revise these at the preliminary draft, and preliminary final stages of preparation for the EIS.
- 6.2 Provide monthly progress and management reports showing both dollars and labor hours for each draft and each revision of an EIS as well as percent of total funds spent toward deliverables. Monthly reports are due by the fifth working day of the month.
- 6.3 Provide and distribute copies of a preliminary draft EIS.
- 6.4 Design, prepare and provide a draft report of proposed mitigation measures or a draft mitigation action plan.
- 6.5 For the draft EIS approved by the NEPA Document Manager, provide a camera-ready and/or electronic file copy suitable for printing, procure printing for the number of copies specified, or make the number of copies specified.
- 6.6 Prepare draft distribution lists and draft transmittal letters for a draft EIS.

- 6.7 Deliver and distribute copies of the draft EIS other materials related to the EIS preparation, such as may be provided to a public reading room.
 - 6.8 Prepare and provide materials to support public involvement such as sign-up sheets, posters, comment forms, and handouts.
 - 6.9 Provide copies of transcripts of the public scoping meetings and hearings on the draft EIS for distribution within DOE and to public reading rooms.
 - 6.10 Provide draft responses to agency and public comments on the draft EIS.
 - 6.11 Provide and distribute copies of a preliminary final EIS.
 - 6.12 For a final EIS approved by the NEPA Document Manager, provide a camera-ready and/or electronic file copy suitable for printing, procure printing for the number of copies specified, or make the number of copies specified.
 - 6.13 Prepare draft distribution lists and draft transmittal letters for a final EIS.
 - 6.14 Distribute copies of a final EIS and other materials related to the EIS preparation, such as may be provided to a public reading room or the EM Information Center.
 - 6.15 Compile and catalog an AR file for the EIS and keep it current with the development of the EIS. The Contractor shall deliver the AR file to a place designated by the NEPA Document Manager.
 - 6.16 Provide electronic copies of a final EIS in accordance with U.S. Department of Energy, Office of Environment, Safety and Health, Electronic Publishing Standards and Guidelines, or as specified the NEPA Document Manager.
- 7.0 TIME FRAMES FOR COMPLETION OF DELIVERABLES

The Contractor should plan to complete an EIS in 24 months from DOE issuing a notice of intent to approving a final EIS. The time period may be adjusted by DOE based on the circumstances surrounding the preparation of an EIS.