



SRSNE Site Group

**Remedial Design Project
Operations Plan**

Solvents Recovery Service of New England, Inc.
(SRSNE) Superfund Site
Southington, Connecticut

November 2010

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New England, Inc. (SRSNE)
Superfund Site
Southington, Connecticut

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SRSNE Site Group

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- D Health and Safety Plan
- E Community Relations Support Plan

1. Introduction

On October 30, 2008, the United States Environmental Protection Agency (USEPA) lodged a Consent Decree (CD) with the United States District Court for the District of Connecticut in connection with Civil Actions No. 3:08cv1509 (SRU) and No. 3:08cv1504 (WWE). The CD was entered by the Court on March 26, 2009. The CD addresses Remedial Design/Remedial Action (RD/RA) activities for the Solvents Recovery Service of New England, Inc. (SRSNE) Superfund Site in Southington, Connecticut (Site). Appendix B to the CD is a Statement of Work (SOW) that defines the required RD/RA activities and deliverables. One of the SOW-specified requirements is the development of a Project Operations Plan to support the RD activities. This *Remedial Design Project Operations Plan* (RD POP) has been prepared on behalf of the SRSNE Site Group, an unincorporated association of Settling Defendants to the CD, to address that SOW requirement.

The overall purpose of this RD POP is to establish procedures to be followed in performing field, laboratory, and analysis work in support of the RD activities described in the separately bound *Remedial Design Work Plan* (RDWP) for the Site. It also identifies the schedule for implementing and reporting RD activities, and discusses planned community relations support activities. Consistent with the requirements indicated in Section V.C.2 of the SOW, this RD POP includes the following components:

- Site Management Plan (SMP)
- Schedule for implementation and reporting
- Sampling and Analysis Plan, which includes a Quality Assurance Project Plan (QAPP) and Field Sampling Plan (FSP)
- Site-Specific Health and Safety Plan (HASP)
- Community Relations Support Plan (CRSP)

With the exception of the project schedule, which is further discussed in Section 2, these components are formatted as individual plans and provided as attachments to this RD POP. The scope and content of these plans were developed consistent with applicable guidance and minimum content

requirements specified in Attachment C to the SOW. The title and an overview of scope/content for each plan are summarized as follows:

Attachment	Scope/Content
A - Site Management Plan (SMP)	The SMP describes how the RD activities will be managed. The overall objective of the SMP is to provide USEPA and CTDEP with a written understanding of how various project aspects such as access, security, contingency procedures, management responsibilities, waste disposal, budgeting, and data handling will be performed by the SRSNE Site Group.
B - Sampling and Analysis Plan: Field Sampling Plan (FSP)	The FSP establishes sample collection and field monitoring methods and procedures to ensure that sampling and investigatory activities are conducted in a consistent manner and in accordance with technically acceptable protocols. The objective of the FSP is to facilitate the collection of environmental monitoring data that meets Data Quality Objectives (DQOs) established in the QAPP.
C - Sampling and Analysis Plan: Quality Assurance Project Plan (QAPP)	The QAPP supplements the RDWP and presents the sampling and analytical methods and procedures that will be used during RD investigations at the Site. It integrates the technical and quality aspects of the project into an approach for obtaining the type and quality of environmental data and information needed for a specific decision or use.
D - Health and Safety Plan (HASP)	The HASP establishes the minimum procedures, personnel responsibilities and training necessary to protect the health and safety of all on-site personnel during the RD activities, including routine but potentially hazardous field activities and unexpected site emergencies.
E - Community Relations Support Plan (CRSP)	The CRSP summarizes pertinent information regarding the Site history and anticipated public involvement activities, and describes how the SRSNE Site Group will support USEPA's implementation of a Community Relations Support Plan.

2. Schedule

Section V.C.2.b requires that the RD POP include a schedule for implementing and reporting the RD activities. To this end, Figures 1 and 2 provide detailed bar chart project schedules. Figure 1 is a comprehensive schedule that identifies major project components. Figure 2 is a schedule that focuses on RD/RA activities occurring over a two year period commencing with submittal of the RDWP and RD POP.

In addition to the bar-chart schedules, the following commentary is provided regarding the project schedule:

- In order to facilitate timely implementation of project activities, the SRSNE Site Group has requested “accelerated” USEPA approval of certain RD activities in advance of the remainder of the RDWP and RD POP. This has been discussed with the USEPA and CTDEP as part of pre-submittal meetings related to these documents. The specific plans/activities for which accelerated review and approval is requested include:
 - *Overburden NAPL Delineation Plan* (Attachment A to the RDWP): so that field activities associated with delineation of the overburden NAPL area can be completed in the northwest portion of the former SRSNE Operations Area
 - *Habitat Restoration Work Plan* (Attachment H to the RDWP): so that field reconnaissance and wetland assessment activities can be initiated during the preferred seasons so that appropriate habitat-related information will be available to support design activities
 - *Pre-ISTR Preparation Plan* (Attachment M to the RDWP): to accelerate the design and implementation of certain activities that must be completed in advance of initiating the *in-situ* thermal remediation (ISTR) component of the remedy
- For the purpose of accelerating the overall project schedule, and because they utilize previously established and approved procedures, the following activities are expected to be initiated “at risk” following submittal of the RDWP:

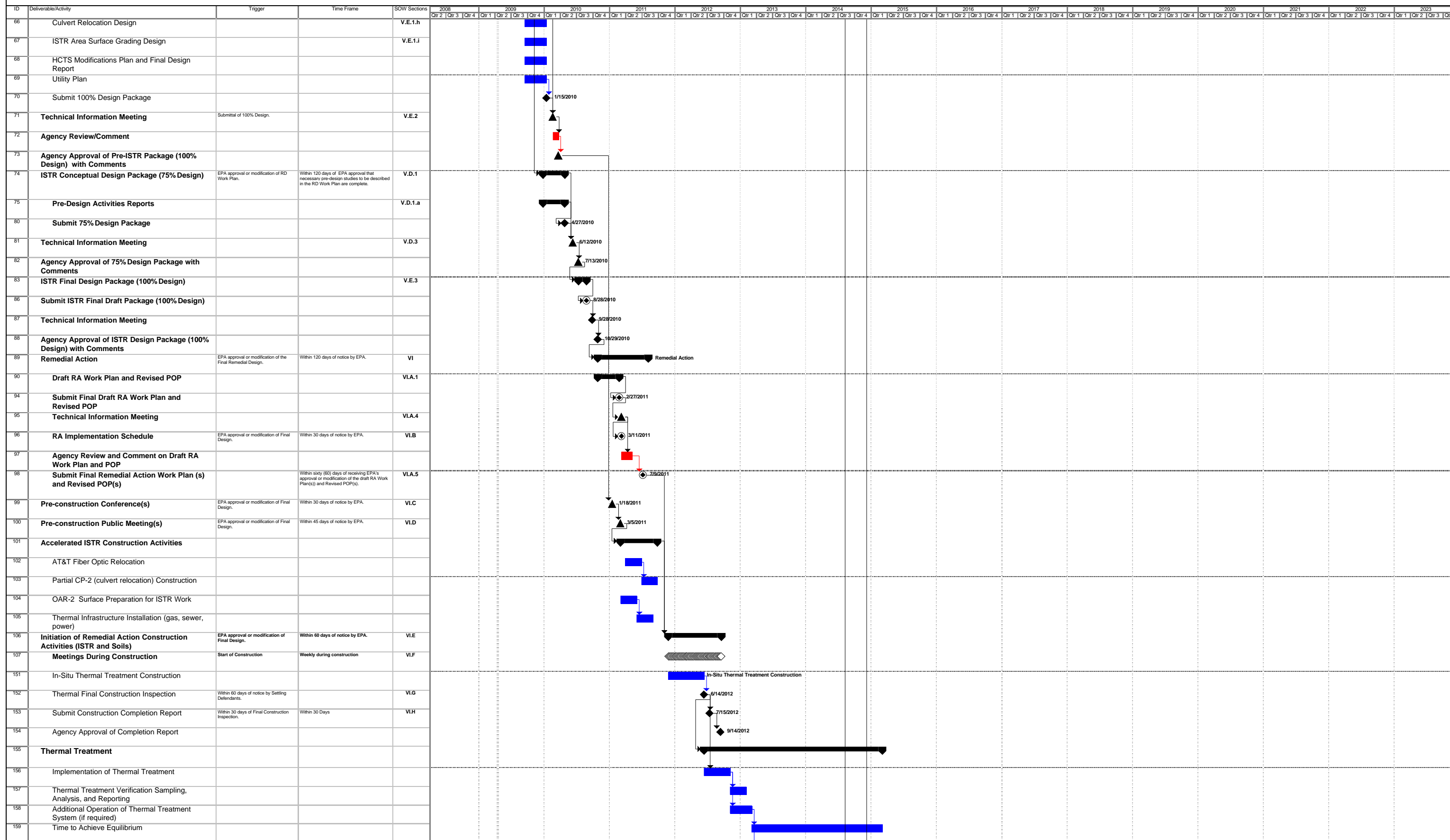
- Soil sampling in the railroad right-of-way associated with the pre-design of the culvert relocation component of the remedial approach (refer to *Pre-ISTR Preparation Plan*; Attachment M to the RDWP)
- Monitoring well integrity assessments and maintenance activities, as needed (*Monitoring Well Network Evaluation and Groundwater Monitoring Program*; Attachment N to the RDWP)
- The schedule includes certain assumptions regarding project components, durations, and inter-relations. While the assumptions represents a good-faith estimate of the project sequence, the need for and duration of certain elements cannot be accurately predicted at this time but affect the actual progression of the project. Such assumptions include:
 - the duration of agency review periods for project deliverables
 - the need for and duration of comment response periods
 - the need for and timeframes associated with negotiating property access
 - the timeframes required for work to be performed by others (e.g., AT&T involvement in the relocation of a fiber optic cable currently present in the railroad right-of-way; refer to the *Pre-ISTR Preparation Plan* provided as Attachment M to the RDWP)
- Some RDWP-specified pre-design investigation PDI activities are to be performed following USEPA approval while others are triggered by other RD or RA activities. For example, as required by the SOW, sampling to confirm cap limits (*Soil Investigation Plan*; Attachment I to the RDWP) cannot be completed until ISTR implementation is complete. Therefore, to a certain extent, the timelines associated with different project components are inter-related. To the extent possible, these triggers and inter-relations are incorporated into the project schedule, and they affect the earliest timeframe at which certain tasks can be initiated.
- Consistent with SOW Section V.C.3 and Section 4 of the RDWP, the schedule assumes separate timelines for development of major project

components, including the pre-ISTR preparation activities; ISTR implementation, soil excavation and capping, and groundwater monitoring.

- Section 4 of the RDWP proposes two RD submittals (concept and final design) for each project component rather than three submittals (conceptual, pre-final, and final) as prescribed by the SOW. The schedule reflects the approach proposed in the RDWP for phasing and streamlining the RD process for the Site, rather than the SOW design approach.
- As indicated above, the schedule represents a good faith projection of the course of the RD/RA activities. To the extent that the actual work progression may differ, schedule updates will be included with Annual State of Compliance Reports as required by Section VIII.B of the SOW.

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Figures



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Attachments

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Attachment A

Site Management Plan

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Attachment B

Sampling and Analysis Plan:
Field Sampling Plan

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Attachment C

Sampling and Analysis Plan:
Quality Assurance Project
Plan

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Attachment D

Health and Safety Plan

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Attachment E

Community Relations Support
Plan