Request for Bid

Fixed-Price Defined Scope of Work

Additional Characterization and Site Closure Activities

Solicitor

Tim Shell and Ron Hall

Former Dunbar Amoco

1809 University Drive (Route 119) Dunbar Township, Fayette County, Pennsylvania 15431

PADEP Facility ID #: 26-18711 PAUSTIF Claim #: 1996-0116(F)

Date of Issuance

May 18, 2022

Table of Contents

Calendar of Events	L
Contact Information	2
Requirements	3
Mandatory Pre-Bid Site Meeting	3
Submission of Bids	3
Bid Requirements	4
Bid Review and Evaluation	3
General Site Background and Description10)
Scope of Work (SOW)	5
Objective1	6
Constituents of Concern (COCs)1	6
General SOW Requirements1	6
Site-Specific Milestones1	7
Additional Information2	4
List of Attachments	5

The Pennsylvania Underground Storage Tank Indemnification Fund (PAUSTIF), on behalf of the claimant who hereafter is referred to as the Client or Solicitor, is providing this Request for Bid (RFB) to prepare and submit a bid to complete the Scope of Work (SOW) for the referenced Site. The Solicitors are the former owners of the Site. PAUSTIF has determined that the claim reported by the Solicitor is eligible for coverage from the PAUSTIF subject to the applicable statutes and regulations. Reimbursement of Solicitor approved reasonable and necessary costs, not to exceed the claim aggregate limit, for the corrective action work described in this RFB will be provided by PAUSTIF. Solicitor is responsible to pay any applicable deductible and/or proration.

Each bid response will be considered individually and consistent with the evaluation process described in the PAUSTIF Competitive Bidding Fact Sheet which can be downloaded from the PAUSTIF website https://ustif.pa.gov.

Activity	Date and Time
Notification of Intent to Attend Site Visit	June 6, 2022 by 5 p.m.
Mandatory Pre-Bid Site Visit	June 7, 2022 at 10 a.m.
Deadline to Submit Questions	June 21, 2022 by 5 p.m.
Bid Due Date and Time	July 1, 2022 by 3 p.m.

Calendar of Events

Contact Information

Technical Contact

J. Neil Ketchum, P.G. Groundwater Sciences Corporation 2550 Interstate Drive, Suite 303 Harrisburg, PA 17110 nketchum@groundwatersciences.com

All questions regarding this RFB and the subject Site conditions must be directed via email to the Technical Contact identified above with the understanding that all questions and answers will be provided to all bidders. The email subject line must be "Former Dunbar Amoco 1996-0116(F) – RFB QUESTION". Bidders must neither contact nor discuss this RFB with the Solicitor, PAUSTIF, the Pennsylvania Department of Environmental Protection (PADEP), or ICF unless approved by the Technical Contact. Bidders may discuss this RFB with subcontractors and vendors to the extent required for preparing the bid response. Questions and their respective answers will become part of the RFB, which in turn, will become part of the final contract. Bidders are responsible to monitor questions and answers and address any changes, modifications or clarifications made to the RFB as a result of the questions and answers.

Requirements

Mandatory Pre-Bid Site Meeting

On behalf of the Solicitor, the Technical Contact, or their designee will hold a mandatory Site visit on the date and time listed in the Calendar of Events to conduct a Site tour for one (1) participant per bidding company. The Technical Contact will collect questions and respond via email. All guestions and answers will be provided via email to all attendees. This meeting is mandatory for all bidders, no exceptions. This meeting will allow each bidding company to inspect the Site and evaluate Site conditions. A notice of the bidder's intent to attend this meeting is requested to be provided to the Technical Contact via email by the date listed in the Calendar of Events with the subject "Former Dunbar Amoco 1996-0116(F) - SITE MEETING **ATTENDANCE NOTIFICATION**". The name and contact information of the company participant should be included in the body of the email. Notification of intent to attend is appreciated; however, it is not required. Attendance at the Pre-Bid Site Meeting is mandatory and each attendee must sign-in with the Technical Contact on site to record attendance. Due to the circumstances surrounding the COVID-19 pandemic, all attendees should follow CDC safety guidelines. Changes to the Site meeting date and/or time due to inclement weather conditions or other unexpected circumstances will be posted at https://ustif.pa.gov/bids; and, the Technical Contact may notify via email all companies that provided Site Meeting Attendance Notification.

Submission of Bids

To be considered for selection, an electronic .pdf version of the signed bid package must be submitted to RA-Bid-Submission@icf.com by the bid due date and time in the Calendar of Events. Bid cost spreadsheets may be submitted in Microsoft Excel format. File sizes in excess of 5 MB are to be submitted using a file share service of your choosing. If you do not have access to a file share service, an email must be sent to RA-Bid-Submission@icf.com, at least 24 hours prior to the bid due date and time, to request access to PAUSTIF's third party administrator, ICF, file share service. Reply messages will be sent to acknowledge receipt of emails. Bid responses will only be accepted from those companies that attended the Mandatory Pre-Bid Site Meeting. Bids attempted to be submitted through ground services such as USPS, UPS, Fed-Ex, etc. or hand delivery will not be considered for selection. PAUSTIF, in its discretion, reserves the right to reject or allow correction to bid submissions that are substantively deficient in some manner, but any late submission will be rejected.

The bid must be received by 3 p.m., on the due date shown in the Calendar of Events. Bids will be opened immediately after the 3 p.m. deadline on the due date. Any bids received after this due date and time will be returned. If, due to inclement weather, natural disaster, or any other cause, the deadline for submission may be extended. The PAUSTIF's third party administrator, ICF, may notify all companies that attended the Mandatory Pre-Bid Site Meeting of an extended due date. The hour for submission of bids shall remain the same.

Bid Requirements

The Bid Submission Coversheet included as Attachment 1 to this RFB must be completed, signed by an authorized representative of the company, and included as the first page of the Bid Submission. Bids that are not signed may be rejected. The name and contact information of the person who is to be contacted in the event clarification is required and/or the bid is selected by the Solicitor must be listed on the Bid Submission Coversheet.

The Solicitor wishes to execute a mutually agreeable contract with the selected consultant ("Remediation Agreement"). The Remediation Agreement is included as Attachment 2 to this RFB. The bidder must indicate if the Remediation Agreement is accepted with no changes. If changes are proposed, bidder must identify and document proposed modifications to the Remediation Agreement language other than obvious modifications to fit this RFB (e.g., names, dates, and descriptions of milestones). The number and scope of any modifications to the standard agreement language must be listed on the Required Responses Submission Form (Attachment 3), including, but not limited to, terms and conditions, Exhibits A and B, Site-Specific Assumptions and Provisions; and, will be one of the criteria used to evaluate the bid and will need to be agreed upon by both the Solicitor and PAUSTIF (for funding).

The selected consultant will be provided an electronic copy of the draft Remediation Agreement in Microsoft Word format to allow agreement-specific information to be added. The selected consultant shall complete the agreement-specific portions of the draft Remediation Agreement and return the document to the Technical Contact within 10 business days from date of receipt.

The Remediation Agreement fixed costs shall be based on unit prices for labor, equipment, materials, subcontractors/vendors, and other direct costs. The total cost quoted in the bid by the selected consultant will be the maximum amount to be paid by the Solicitor unless a change in scope is authorized and determined to be reasonable and necessary. There may be deviations from and modifications to this SOW during the project. The Remediation Agreement states that any significant changes to the SOW will require approval by the Solicitor, PAUSTIF, and PADEP. NOTE: Any request for PAUSTIF reimbursement of the reasonable costs to repair or replace a well will be considered on a case-by-case basis.

The bidder must complete and include in their bid response the Required Responses Submission Form, included as Attachment 3 to this RFB.

The bidder shall provide its bid cost only in the Bid Cost Submission Form (included as Attachment 4) with descriptions for each task provided in the body of the bid document. No cost information should be provided in the technical submittal. Bidders are responsible to ensure all costs are provided in the Bid Cost Submission Form, and calculations (including, but not limited to the total

bid cost) are accurate; the Bid Cost Submission Form must be signed by an authorized representative of the company. In addition, bidders are required to include, as backup for the Bid Cost Submission Form, a list of bid labor rates and a detailed breakdown of each milestone fixed-cost including, but not limited to, labor, subcontractor costs and mark-up, direct costs, and equipment. Copies of subcontractor quotes and/or estimates should be included as part of the cost submittal backup. The technical score for bids will be based solely on those tasks represented as milestones included in the Bid Cost Submission Form and the total bid cost. Any optional bidder-defined tasks, milestones, or cost adders that are not requested as part of this RFB will not be considered by the Bid Evaluation Committee in the technical review and technical score for the bid.

Each bid will be assumed to be valid for a period of up to 180 days after receipt unless otherwise noted. The costs quoted in the Bid Cost Submission Form will be assumed to be valid for the duration of the Remediation Agreement.

Please note that the total fixed-price bid must include all costs, including those cost items that the bidder may regard as "variable". These variable cost items will not be handled outside of the total fixed-price quoted for the SOW unless the RFB requests costing alternatives for specific items or services.

The RFB is requesting a total fixed-price bid unless the RFB requests costing alternatives for specific items or services. PAUSTIF will not agree to assumptions (in bids or the selected bidders executed Remediation Agreement) referencing a level of effort and/or hours. Costs provided in your bid should be developed using your professional opinion, experience, and the data provided. PAUSTIF will not reimburse costs for additional hours to complete activities included as part of the base bid/contract price.

Each bid response document must include at least the following:

- 1. Completed Bid Submission Coversheet (Attachment 1), Required Responses Submission Form (Attachment 3) and Bid Cost Submission Form (Attachment 4 and must include supporting documentation).
- 2. Demonstration of the bidder's understanding of the Site information provided in this RFB, standard industry practices, and objectives of the project.
- 3. A clear description, specific details, and original language of how the proposed work scope will be completed for each milestone. The bid should specifically discuss all tasks that will be completed under the Remediation Agreement and what is included (e.g., explain groundwater purging/sampling methods, which guidance documents will be followed, what will be completed as part of the Site specific work scope/SCR/RAP implementation).

Bidders must bid the Scope of Work as requested in this RFB. Recommendations for changes/additions to the Scope of Work proposed in this RFB shall be discussed, quantified, and priced separately; however, failure to also bid the SOW "as is" may result in a low technical score. Bids should include enough original language conveying bidder's thought such that the understanding of site conditions, closure approach (if applicable), and approach to addressing the scope of work can be evaluated. Since bidders are not prequalified, the bid response must provide the Bid Evaluation Committee and Solicitor enough information to complete a thorough review of the bid and bidder.

- 4. A copy of an insurance certificate that shows the bidder's level of insurance consistent with the requirements of the Remediation Agreement. Note: The selected consultant shall submit evidence to the Solicitor before beginning work that they have procured and will maintain Workers Compensation, commercial general and contractual liability, commercial automobile liability, and professional liability insurance commensurate with the level stated in the Remediation Agreement and for the work to be performed.
- 5. The names and brief resumes and statement of qualifications of the proposed project team including the proposed Professional Geologist and Professional Engineer (if applicable) who will be responsible for overseeing the work and applying a professional seal to the project deliverables (including any major subcontractor(s)). Resumes should directly follow the Required Responses Submission Form.
- 6. A description of subcontractor involvement by task. Identify and describe the involvement and provide actual cost quotations/bids/proposals from all significant specialized subcontracted service (e.g., drilling/well installations, laboratory, etc.) as part of the bid cost submission back up. If a bidder chooses to prepare its bid without securing bids for specialty subcontract services, it does so at its own risk. Added costs resulting from bid errors, omissions, or faulty assumptions will not be considered for PAUSTIF reimbursement.
- 7. A detailed schedule of activities for completing the proposed SOW including reasonable assumptions regarding the timing and duration of Solicitor reviews (if any) needed to complete the SOW. Each bid must provide a schedule that begins with execution of the Remediation Agreement with the Solicitor and ends with completion of the final milestone proposed in this RFB. Schedules must also indicate the approximate start and end date of each of the tasks/milestones specified in the Scope of Work, and indicate the timing of all proposed key milestone activities (e.g., within 30 days of the contract being executed).
- 8. A description of how the Solicitor, ICF, and the PAUSTIF will be kept informed as to project progress and developments and how the Solicitor (or designee) will be informed of and participate in evaluating technical issues that may arise during this project.

- 9. A description of your approach to working with the PADEP. Describe how the PADEP would be involved proactively in the resolution of technical issues and how the PADEP case team will be kept informed of activities at the Site.
- 10. Key exceptions, assumptions, or special conditions applicable to the proposed SOW and/or used in formulating the proposed cost estimate. Key exceptions, assumptions, or special conditions that bidder proposes as modification to the Remediation Agreement must be identified and listed on the Required Responses Submission Form (Attachment 3). Please note that referencing extremely narrow or unreasonable assumptions, special conditions, and exceptions will be considered during bid evaluation and may negatively impact technical score.

Bid Review and Evaluation

1. Bid Review and Scoring

Bid submissions where the bidder was represented at the mandatory pre-bid site meeting and that were properly submitted by the designated due date and time will be accepted for review.

Clarification & Additional Information

After receipt of the bids, the USTIF shall have the right to contact Bidders for the purpose of:

- Seeking clarification of the Bid which informs the USTIF's understanding of statements or information in the Bid;
- As a result of clarification, determining whether the bidder seeks to withdraw their bid.

Administrative Evaluation

USTIF will determine if a bid is administratively qualified based on certain criteria including, but not limited to acceptance of the Remediation Agreement, proposed modifications to the Remediation Agreement, history of terminated Remediation Agreements and demonstration of insurance requirements.

Technical Scoring

Bids that are considered administratively qualified are evaluated for technical viability before cost is considered. Bids that have technical scores that are equal to or greater than 70% of the highest technical score will advance to cost scoring. Bids with technical scores below 70% of the highest technical score are eliminated from further consideration.

Numerical values will be assigned for defined SOW bids for two categories:

- Understanding the problem and demonstrating knowledge of how to perform the work
- Qualifications and Experience

Numerical values will be assigned to three categories in those cases where there is a bidto-result request:

- Understanding of the problem
- Technical and Regulatory Approach to Remediation
- Qualifications and Experience

Cost Scoring

Cost scores are determined by a cost formula. The bid(s) with the lowest total cost receives the maximum cost points available. The remaining bids are scored by applying the following cost formula: $(1-((B-A)/A)) \times C = D$

- A = the lowest bid cost
- B = the bidder's cost being scored
- C = the maximum number of cost points available
- D = bidder's cost score (points)

If a bid cost is double or greater than double the amount of the lowest bid cost the bid will be assigned zero cost points.

2. Evaluation of Bids

A committee comprised of at least two members of the USTIF staff, two members of TPA staff, and the TPR who assisted in developing the RFB will score all bids that are administratively qualified based on the above criteria. USTIF reserves the right to assign additional non-scoring members to the evaluation committee as needed. USTIF recognizes that several bids may be acceptable and receive similar numerical scores. At the conclusion of the scoring process, the claimant will receive those bids whose numerical scores place them in the category of meeting Reasonable and Necessary criteria and acceptable for USTIF funding. The claimant may select any of the consulting firms that had a technical score that allowed the bid to advance to cost scoring, to implement the tasks described in the bid; however, USTIF will only provide funding up to the highest fixed price of those bids determined to be Reasonable and Necessary for USTIF funding.

General Site Background and Description

Each bidder should carefully review the existing information and documentation provided in Attachment 5. The information and documentation has not been independently verified. Bidders may wish to seek out other appropriate sources of information and documentation specific to this Site. If there is any conflict between the general Site background and description provided herein and the source documents within Attachment 5, the bidder should defer to the source documents. All figures and reports referenced in this section are provided in Attachment 5.

Site Name and Address

Former Dunbar Amoco 1809 University Drive (State Route 119) Dunbar, Pennsylvania 15431

Facility Information

The Site is a former retail fueling facility located on the west side of University Drive, at the intersection of University Drive and Hi Way Supply Road, in Dunbar Township, Fayette County, Pennsylvania (Figure 1 in Attachment 5a). The Site currently operates as a used car dealership (Summit Motors Used Cars Plus, LLC [Summit]). Mr. Mick McGuire owns Summit and the Site property (Parcel 09-31-0013). The Site is surrounded by both residential and commercial properties. The Site is a triangular-shaped 0.41-acre property bordered by three roads, University Drive to the east/southeast, Hi Way Supply Road to the west/southwest, and Pechin Road to the north. One building is situated in the central portion of the parcel. This slab-on grade building includes an office, a restroom, a storage room, and two garage bays for automobile repairs and inspections. The majority of the northern half of the parcel is covered by pavement and concrete and the majority of the southern half of the parcel is covered by gravel and grass. There are no known underground storage tanks (USTs) at the Site. The Site and surrounding properties are connected to municipal sewer and water. A pond, shown on Figure 1 in Attachment 5a, is located approximately 900 feet to the west of the Site.

Release Description

Evidence of a reportable release from a loose swing joint and coupler connections along the subsurface piping to the dispensers was discovered on May 13,1996 during product piping upgrades. A Notification of Reportable Release was submitted to the PADEP on May 28, 1996.

Underground Storage Tank Closure

The registered USTs were closed by removal in January 2005. According to the UST Closure Report, water with floating petroleum product was encountered during the removal of the USTs. Two water samples and five soil samples were collected as part of the UST closure. Both water samples contained concentrations of petroleum substances above non-residential used aquifer (NRUA) Statewide health standard (SHS) medium-specific concentrations (MSCs) and the soil sample collected from beneath the product piping contained concentrations of benzene and

toluene above NRUA SHS MSCs. The UST Closure Report was included as Appendix F in the Comprehensive Environmental Site Characterization Report submitted by Letterle & Associates, LLC. in September 2006.

Characterization and Remedial Activities

Characterization activities were initiated in 1997. Since 1997, characterization activities have included the collection of 47 soil samples from soil borings advanced on and off Site and the installation and sampling of more than 30 wells of various types. These wells include groundwater monitoring wells, recovery wells, and remediation wells. Additionally, four vapor extraction monitoring points (installed as part of a soil vapor extraction (SVE) pilot test) and six soil gas sampling points (to evaluate vapor intrusion) were installed and surface water samples have been collected from the off-Site pond located west of the Site on Parcel 09-31-0015-04. Several of the wells installed for groundwater monitoring and/or remediation have been destroyed or abandoned. The soil boring locations are shown on the Soil Boring Location Map included as Figure 2 in Attachment 5a. The locations of the current and former wells, vapor extraction monitoring points, and soil gas sampling points are shown on the Well Location Map included as Figure 3 in Attachment 5a.

Historical remedial activities include the operation of an air sparge and soil vapor extraction (AS/SVE) system from October 1998 to June 2000, the operation of high diffusion air bubblers along with bioaugmentation between July 2000 and July 2005, and soil excavation (approximately 86 tons during the January 2005 UST closure).

Between 1997 and 2012, several corrective action process reports were submitted for the Site. A summary of these reports is provided below and copies of the reports are included in Attachment 5.

- Site Characterization Report May 4, 1998, Chambers Environmental Group, Inc. (Attachment 5c)
- Soil Vapor Extraction/Air Sparge Pilot Test Report June 30, 1998, Chambers Environmental Group, Inc. (Attachment 5d)
- Comprehensive Environmental Site Characterization Report September 2006, Letterle & Associates, LLC. (Attachment 5e)
- Additional Site Characterization Report/Groundwater Monitoring Report April 2011, Letterle & Associates, LLC. (Attachment 5f)
- Yearly Progress Report and Pilot Test April 2012, Letterle & Associates, LLC. (Attachment 5g)

On January 29, 2013, PAUSTIF published an RFB for a Fixed-Price Defined Scope of Work to "Complete Additional Site Characterization and Site Closure Activities". The scope of work in the RFB included the following tasks:

- Obtain off-site access;
- Installation, development, and surveying of two on-Site and six off-Site shallow bedrock groundwater monitoring wells;
- Collection of soil vapor samples; and
- Preparation and submittal of a Supplemental Site Characterization Report (SCR) and Revised Remedial Action Plan (RAP).

Through the RFB process, Converse Consultants (Converse) became the consultant of record for the Site in August 2013. Upon completing additional characterization activities, Converse submitted to the PADEP a Supplemental SCR and RAP in September 2017. The September 2017 Supplemental SCR and RAP included details on the installation and development of thirteen shallow bedrock groundwater monitoring wells (MW-10S, MW-12S, MW-13S, MW-18S, MW-19S, MW-20S, MW-21S, MW-22S, MW-23S, MW-24S, MW-25S, MW-26S, and MW-27S), four rounds of groundwater sampling, and an updated site conceptual model. The Supplemental SCR and RAP proposed the site-specific standard (SSS) as the remedial goal for soil and groundwater at the Site. In correspondence dated October 31, 2017, the PADEP approved the Supplemental SCR and RAP with the following modifications:

- Completion of eight additional rounds of groundwater sampling for site characterization purposes, attainment purposes, and to determine plume stability.
- LNAPL [light non-aqueous phase liquid] gauging, for the purposes of demonstrating LNAPL migration potential and thickness, and for potential recovery efforts, which should be initiated immediately. An interim response plan for the LNAPL recovery and gauging efforts should be submitted to the Department within the next sixty (60) days.
- Onsite and offsite vapor sampling was conducted near buildings and residential properties, and results indicated no vapor intrusion issues. However, these areas should be resampled and screened in accordance with the January 2017 Vapor Intrusion Guidance Manual.
- Submission of a DRAFT Environmental Covenant (EC), for review by the Department, within the next sixty (60) days, which includes the institutional controls that will be included in the source property covenant, as well as an indication as to whether offsite property owners(s) are willing to participate in any required ECs for their property(ies).

On December 27, 2017, Converse submitted to the PADEP a Draft Environmental Covenant and Interim Response Plan. The document included the following:

- A summary of attempts to discuss environmental covenants with off-Site property owners;
- A draft environmental covenant for the Site property;
- A proposal to install two recovery wells (R-1 and R-2) between the Site and off-Site groundwater monitoring well MW-12S to further evaluate the presence of SPL and provide recovery wells for SPL removal;
- Passive SPL recovery using absorbent socks; and

• The use of a vacuum truck or portable groundwater treatment system to remove SPL when six inches or more of SPL is measured in a single well.

A copy of the September 2017 SCR and RAP, the PADEP approval letter, and the Draft Environmental Covenant and Interim Response Plan are included as Attachments 5h, 5i, and 5j, respectively.

On March 6, 2018, the two proposed recovery wells were installed along the west side of Hi Way Supply Road. Details of recovery well installation and construction are included in the First Quarter 2018 Remedial Action Progress Report (RAPR) included as Attachment 5k. Bidders should note that one recovery well has historically been referred to as both R-1 and RW-1 and one recovery well has been historically referred to as both R-2 and RW-2.

According to the Fourth Quarter 2019 RAPR, four inches of SPL was measured in RW-1 (R-1) in May 2019. In response to the measured SPL, a "high vacuum extraction event" was performed on RW-1 (R-1), RW-2 (R-2), and MW-27S on August 6, 2019. The Fourth Quarter 2019 RAPR also discusses a conversation between Converse and the PADEP that concluded with the decision that "high vacuum events should cease, and only LNAPL monitoring and manual LNAPL bailing should occur to address the LNAPL at the Site for the next several months". The Fourth Quarter 2019 RAPR is included as Attachment 5I.

The most recent RAPR (for the Fourth Quarter 2021) includes tables containing historical depthto-water measurements, calculated groundwater elevations, dissolved-phase concentrations since June 2014, surface water sampling results since June 2016, and SPL measurements since August 2019. The Fourth Quarter 2021 RAPR is included as Attachment 5m.

Please note the following regarding the data included in the Attachments:

- Historical groundwater elevation calculations do not appear to consistently account for the presence and thickness of SPL.
- Historical SPL thickness measurement units have not been presented consistently.
- The total volume of SPL removed from wells is unknown.
- The "Volume Bailed" column in the "LNAPL Thickness" tables included in recent RAPRs represents the volume of groundwater and potentially SPL removed, and not the volume of SPL removed.

The current groundwater monitoring well network consists of 21 wells – nine on-Site wells (MW-3, MW-4, MW-7, MW-8, MW-10, MW-10S, MW-18S, MW-22S, and MW-27S) and 12 off-Site wells (MW-6, MW-12, MW-12S, MW15S, MW-16, MW-19S, MW-20S, MW-21S, MW-23S, MW-24S, MW-25S, and MW-26S). Table 1 in Attachment 5b presents a summary of the construction details for these wells and R-1 (RW-1) and R-2 (RW-2). As shown on the well construction summary, groundwater monitoring wells have been designated as either "shallow" or "deep". The total

depths of the shallow wells range from 25 feet below grade (fbg) (MW-25S) to 36 fbg (MW-3) while the total depths of the deep wells range from 46 fbg (MW-6) to 60 fbg (MW-16). Although quarterly groundwater elevation measurements and separate-phase liquid measurements (where applicable) are collected from the 21 groundwater monitoring wells and the two recovery wells, quarterly groundwater samples have only recently been collected from 12 groundwater monitoring wells (MW-3, MW-10S, MW-18S, MW-22S, MW-27S, MW-12, MW-12S, MW15S, MW-19S, MW-20S, MW-21S, and MW-26S). Groundwater samples have not been collected from: MW-4 since December 2018, MW-7 since March 2019, and MW-6, MW-8, MW-19, MW-16, MW-23S, MW-24S, and MW-25S since May 2019.

Geology and Hydrogeology

According to the Pennsylvania Topographic and Geologic Survey, the mapped bedrock underlying the Site is the Washington Formation, which consists of cyclic sequences of shale, sandstone, limestone, and coal.

Unconsolidated materials were logged as primarily clayey silt. Fill material (e.g., gravel and slag), clay, silty clay, clay with sand, clay with silt, sand with silt, and gravel were also logged.

During drilling activities, bedrock was encountered at depths ranging from three fbg (MW-6, MW-12 and MW-13) to ten fbg (MW-10S, MW-12S, MW-13S, MW-18S, MW-19S, MW-20S, and MW-22S). The shale is reportedly underlain by a coal seam which is reportedly underlain by fractured siltstone.

As shown in the Fourth Quarter 2021 RAPR, since June 2016, depth-to-groundwater measurements in shallow groundwater monitoring wells ranged from less than one foot below top of casing (btoc) (MW-3 and MW-23S) to nearly 30 feet btoc. Depth-to-groundwater measurements in deep groundwater monitoring wells ranged from 22 feet btoc (MW-6) to 46 feet btoc (MW-16). The groundwater table in the vicinity of the Site is generally in bedrock and according to the Fourth Quarter 2021 RAPR, "groundwater elevation data indicate that groundwater flow beneath the Former Route 119 Amoco site is to the south and west in the shallow bedrock aquifer and to the south and west in the deep bedrock aquifer".

Soil Quality

Soil sample analytical data is summarized on Table 2 included in Attachment 5b and the locations of soil borings are shown on Figure 2 in Attachment 5a. As shown on Table 2, concentrations of petroleum substances were reported above PADEP NRUA SHS MSCs in soil samples collected from soil borings A7, A8, and A9 (advanced in May 1997), the product piping sample (PL-1) collected during the UST closure (performed in January 2005), and soil samples collected from soil boring GB-14 (advanced in May 2006). Sample locations, depths, and parameters with concentrations greater than NRUA SHS MSCs are as follows:

1. A6 (4fbg) – benzene,

- 2. A7 (4 fbg) Methyl tert-butyl ether (MTBE),
- 3. A7 (6.5 fbg) MTBE and benzene,
- 4. A8 (4 fbg) MTBE,
- 5. A9 (4 fbg) MTBE,
- 6. PL-1 benzene and toluene, and
- 7. GB-14 (0 to 2 fbg) benzene, toluene, and naphthalene.

It should be noted that the soil samples collected in 1997 were also analyzed for benzo(a)anthracene and benzo(a)pyrene. The concentrations of these substances were below NRUA SHS MSCs.

Groundwater Quality

The most recent groundwater and surface water sample analytical data is presented in the Fourth Quarter 2021 RAPR along with figures showing the locations of groundwater monitoring wells and the distribution of dissolved-phase petroleum substance in groundwater. During the Fourth Quarter 2021 groundwater sampling event, samples containing concentrations of analyzed substances above NRUA SHS MSCs were reported in four on-Site groundwater monitoring wells and seven off-Site groundwater monitoring wells. Groundwater monitoring wells with concentrations of analyzed substances greater than NRUA SHS MSCs during the Fourth Quarter 2021 sampling event are as follows:

- 1. MW-3 benzene,
- 2. MW-10S benzene,
- 3. MW-12 MTBE,
- 4. MW-12S benzene and naphthalene,
- 5. MW-15S benzene and MTBE,
- 6. MW-18S benzene,
- 7. MW-19S benzene and MTBE,
- 8. MW-20S benzene and MTBE,
- 9. MW-21S benzene,
- 10. MW-22S benzene, and
- 11. MW-26S benzene.

Separate-Phase Liquid

As shown on the LNAPL Thickness Table included as Table 2 in the Fourth Quarter 2021 RAPR, since August 2019, measurable SPL has been reported in on-Site groundwater monitoring wells MW-10S, MW-18S, and MW-22S, off-Site groundwater monitoring well MW-12S, and off-Site recovery well R-1 (RW-1). It should be noted that since August 2019, measurable SPL was only observed in wells MW-10S, MW-18S, and MW-22S on one date (January 28, 2021).

Scope of Work (SOW)

This RFB seeks competitive bids from qualified contractors to perform the activities in the SOW specified herein. PADEP reviewed the scope of work; comments are incorporated herein.

Objective

The defined SOW includes quarterly groundwater monitoring, the collection of vapor intrusion and SPL data, the submission of quarterly RAPRs, the submission of a Remedial Action Completion Report (RACR), and site restoration. The objective of the SOW is to collect additional information to facilitate the attainment of the SSS for soil, groundwater, and surface water in the RACR.

Constituents of Concern (COCs)

The COCs for the Site are the unleaded gasoline substances included in the PADEP-approved Comprehensive Environmental Site Characterization Report submitted by Letterle & Associates in September 2006. Specifically, the COCs are the unleaded gasoline substance identified on the pre-March 18, 2008 PADEP short list of petroleum products (benzene, toluene, ethylbenzene, total xylenes, isopropylbenzene (cumene), naphthalene, and MTBE).

General SOW Requirements

The bidder's approach to completing the SOW shall be in accordance with generally accepted industry standards/practices and all applicable federal, state, and local rules, regulations, guidance, and directives. The latter include, but are not limited to, meeting the applicable requirements of the following:

- The Storage Tank and Spill Prevention Act (Act 32 of 1989, as amended);
- Pennsylvania Code, Title 25, Chapter 245 Administration of the Storage Tank Spill and Prevention Program;
- The Land Recycling and Environmental Remediation Standards Act of 1995 (Act 2), as amended);
- Pennsylvania Code, Title 25, Chapter 250 Administration of Land Recycling Program;
- The PADEP Land Recycling Program Technical Guidance Manual dated March 27, 2021 (Technical Guidance Document 261-0300-101); and
- Pennsylvania's Underground Utility Line Protection Law, Act 287 of 1974, as amended by Act 121 of 2008.

During completion of the milestone objectives specified, the selected consultant shall:1

- Conduct necessary, reasonable, and appropriate project planning and management activities. Such activities may include Solicitor communications/updates, meetings, record keeping, subcontracting, personnel and subcontractor management, guality assurance/guality control, scheduling, and other activities (e.g., utility location). Planning and management activities will also include preparing and implementing plans for health and safety, waste management, field sampling/analysis, and/or other plans that are necessary and appropriate to complete the SOW. Planning and management shall include identifying and taking appropriate safety precautions to not disturb Site utilities including, but not limited to, contacting Pennsylvania One Call as required prior to any ground-invasive work. As appropriate, project management costs shall be included in each bidder's pricing to complete the milestones specified below.
- Be responsible for coordinating, managing, and completing the proper management, characterization, handling, treatment, and/or disposal of all impacted soils, water, and derivative wastes generated during the implementation of this SOW. The investigation-derived wastes, including purge water, shall be disposed in accordance with standard industry practices and applicable laws, regulations, guidance, and PADEP directives. Waste characterization and disposal documentation (e.g., manifests) shall be maintained and provided to the Solicitor and the PAUSTIF upon request. All investigation derived wastes shall be handled and disposed per PADEP's Regional Office guidance. It is the selected consultant's responsibility to conform with current PADEP Regional Office guidance requirements in the region where the Site is located.
- Be responsible for providing the Solicitor and facility operator with adequate advance notice prior to each visit to the property. The purpose of this notification is to coordinate with the Solicitor and facility operator to ensure that appropriate areas of the property are accessible. Return visits to the Site will not constitute a change in the selected consultant's SOW or result in additional compensation under the Remediation Agreement.

Site-Specific Milestones

<u>Milestone A – Obtain Off-Site Access.</u> Under this task, the selected bidder shall secure access to three off-Site properties to allow for the performance of activities associated with subsequent Milestones and Optional Milestones (as applicable). The properties for which access shall be secured are Parcels 09-31-0014, 09-31-0015, and 09-31-0015-04. The off-site properties are shown on Figure 4 in Attachment 5a and a summary of the tasks to be performed on each parcel is provided below.

¹ As such, all bids shall include the costs of these activities and associated functions within the quote for applicable tasks/milestones.

- Parcel 09-31-0014: Access to wells for gauging, SPL recoverability assessment, and sampling, sub-slab soil gas sampling, and potentially indoor air sampling.
- Parcel 09-31-0015: Sub-slab soil gas sampling and potentially indoor air sampling.
- Parcel 09-31-0015-04: Access to pond for sampling and access to wells for gauging and sampling.

The cost for Milestone A should allow for the time and materials necessary for obtaining the contact information for each off-Site property owner, contacting each off-Site property owner (verbally and/or in writing), answering questions from each off-Site property owner, and obtaining executed access agreements with one draft revision of each access agreement. The cost should also cover the time and materials necessary to provide the PADEP with information to facilitate access if necessary. Providing this cost does not commit the consultant to obtaining access agreements and reimbursement for this Milestone is not contingent on obtaining executed access agreements for any off-Site properties.

The schedule for Milestone A shall provide one (1) week for Solicitor and PAUSITF to review a draft access agreement for each off-Site property. The final agreement shall address comments received from the Solicitor and PAUSITF on the draft agreement before it is submitted to the property owners.

<u>Milestone B – Separate Phase Liquid Recoverability Assessment.</u> Under this task, an assessment of the recoverability of SPL shall be performed. The recoverability assessment shall include 21 bi-weekly (once every other week) events performed over the three quarter-timeframe associated with Milestone C. Each event shall include the tasks (performed in order) listed below at each of the 21 groundwater monitoring wells – nine on-Site wells (MW-3, MW-4, MW-7, MW-8, MW-10, MW-10S, MW-18S, MW-22S, and MW-27S) and 12 off-Site wells (MW-6, MW-12, MW-12S, MW15S, MW-16, MW-19S, MW-20S, MW-21S, MW-23S, MW-24S, MW-25S, and MW-26S).

- 1. If a petroleum absorbent sock is present in the well, remove the petroleum absorbent sock.
- 2. If the petroleum absorbent sock(s) was installed as part of this SOW (weighed prior to installation), weigh the petroleum absorbent sock and quantify the volume of SPL recovered by the petroleum absorbent sock.
- 3. Using an electronic conductance-type interface probe with a 0.01-foot resolution, determine if measurable SPL is present in each well.
- 4. If measurable SPL is present at a thickness of 0.02 feet or greater, manually remove SPL using a disposable bailer. The removal of SPL using a disposable bailer should be performed in a manner that maximizes the removal of SPL and minimizes the removal of groundwater and the drawdown of groundwater within the well. The volume of SPL removed from each well using a disposable bailer shall be quantified in the same volumetric units as those used as part of task 2 above.
- 5. If a SPL thickness of 0.01 foot or more was measured in the well once or more over the previous eight quarters, place a new, pre-weighed petroleum absorbent sock in the well.

Following the three-quarter SPL recoverability assessment, a stand-alone SPL evaluation report shall be prepared and submitted to the PADEP. The report shall present the results of the field work performed as part of Milestone B and include a maximum extent practicable (MEP) evaluation. The MEP evaluation report shall include a determination that either SPL has been removed to the MEP or SPL has not been removed to the MEP. If SPL has not been removed to the MEP, the report shall include recommendations to remove SPL to the MEP. Bidders are required to provide in their bid response document a description of the data analysis techniques that will be used as part of the MEP evaluation.

Prior to submitting the report to the PADEP, an electronic copy of the report shall be provided to the Solicitor and PAUSTIF for review and comment. The selected bidder shall provide two (2) weeks for the Solicitor and PAUSTIF to review the report and the selected bidder shall address all comments received from the Solicitor and the PAUSTIF before submission of the report to the PADEP.

Milestones C1, C2, and C3 – Quarterly Groundwater Monitoring. Under these tasks, the selected bidder shall perform three consecutive comprehensive quarterly groundwater monitoring events, the first of which will be performed in the calendar quarter following the last quarterly groundwater monitoring event performed by the previous consultant. Each quarterly monitoring event shall include the collection of a surface water sample from the pond and the collection of a groundwater sample from each of the 21 groundwater monitoring wells – nine on-Site wells (MW-3, MW-4, MW-7, MW-8, MW-10, MW-10S, MW-18S, MW-22S, and MW-27S) and 12 off-Site wells (MW-6, MW-12, MW-12S, MW15S, MW-16, MW-19S, MW-20S, MW-21S, MW-23S, MW-24S, MW-25S, and MW-26S). Prior to the first sampling event, the nine groundwater monitoring wells that have not been sample in several years (MW-4, MW-6, MW-7, MW-8, MW-16, MW-25S) shall be developed.

Monitoring well development shall be conducted in accordance with generally accepted practices as outlined in the PADEP's Land Recycling Program Technical Guidance Manual dated March 27, 2021 (Technical Guidance Document 261-0300-101) (TGM).

Depth-to-groundwater and SPL (if present) shall be measured in each well prior to purging and sampling and calculated groundwater elevations in each well shall be adjusted to account for SPL if present. Groundwater and quality assurance/quality control (QA/QC) samples shall be collected in laboratory-provided containers and analyzed by a PADEP-accredited laboratory using appropriate analytical methods and detection levels for the substances listed in the COC section of this RFB.

Based on field notes and discussions with Converse, groundwater monitoring wells were purged by Converse using submersible pumps prior to sampling. Bidders are required to provide in their bid response document the following:

- A discussion on well development, purging, and sampling methods, including a rationale for the methods;
- QA/QC sample collection protocols; and
- Laboratory analysis methods.

<u>Milestones D1, D2, and D3 – Quarterly Remedial Action Progress Reports.</u> Under these tasks, the bidder shall prepare three RAPRs, one for each of the three quarterly groundwater sampling events performed as part of Milestone C1, C2, and C3. Each RAPR shall be submitted to the PADEP and include the elements listed in 25 Pa Code §245.312(c) as well as a Mann-Kendall trend evaluation for each COC reported at a concentration above the NRUA SHS MSC in each groundwater monitoring well during the most recent eight quarters of groundwater sampling.

<u>Milestones E1 and E2 – On-Site Sub-Slab Soil Gas Sampling.</u> Under these tasks, the bidder shall install and sample twice, two sub-slab soil gas sampling points in the lowest accessible level of the Site building. All bidders are required to provide in their bid response document a description of how the sub-slab soil gas sampling points would be installed, constructed, purged, sampled, the laboratory reporting limits for the samples, and a description of the QA/QC actions associated with the collection of the samples. Each sampling event shall include one duplicate sample and an ambient outside air sample. The sampling events shall be separated by at least 45-days. The sub-slab soil gas samples shall be analyzed by EPA Method TO-15 for substances listed in the COC section of this RFB.

<u>Milestones F1 and F2 – Off-Site Sub-Slab Soil Gas Sampling.</u> Under these tasks, the bidder shall install and sample twice, two sub-slab soil gas sampling points in the lowest accessible level of the residential structure located on Parcel 09-31-0014. The sub-slab soil gas sampling shall be performed in accordance with Milestones E1 and E2.

<u>Milestones G1 and G2 – Off-Site Sub-Slab Soil Gas Sampling.</u> Under these tasks, the bidder shall install and sample twice, two sub-slab soil gas sampling points in the lowest accessible level of the residential structure located on Parcel 09-31-0015. The sub-slab soil gas sampling shall be performed in accordance with Milestones E1 and E2.

<u>Milestone H – Preparation and Approval of a Remedial Action Completion Report.</u> Under this task, a RACR shall be prepared in general accordance with 25 Pa Code §245.313 and other applicable statutes, regulations, and guidance. The preparation of the RACR under this Milestone is contingent upon the bidder successfully demonstrating that SPL has been removed to the MEP, dissolved-phase concentrations of COCs are not increasing, and all exposure pathways have been evaluated. The RACR shall be signed and sealed by a Professional Geologist registered in the Commonwealth of Pennsylvania. Text, tables, figures, and other attachments that support the relief from liability shall include, but not be limited to, the following:

- Comprehensive groundwater elevation data, including SPL measurements, in table form,
- Comprehensive groundwater and surface water sampling results in table form,
- Comprehensive soil sampling results in table form,
- Comprehensive sub-slab soil gas and indoor air data (if applicable) in table form,
- Time vs concentration graphs and Mann-Kendall statistical trend evaluations for each COC reported in each groundwater monitoring well above the NRUA SHS MSC,
- Scaled figures showing the groundwater monitoring well, soil sample, and sub-slab soil gas and indoor air (if necessary) sample locations,
- Scaled figures for each round of quarterly groundwater sampling performed as part of this SOW that show groundwater elevation data, groundwater elevation contours, and inferred direction(s) of groundwater flow,
- Scaled figures for each COC detected in groundwater samples collected over the previous eight quarters above the NRUA SHS MSCs. Each figure should show COC concentrations in each well and inferred dissolved-phase plume contours,
- A fate and transport analysis for COCs (if appropriate),
- Laboratory reports, chains of custody, and field sampling documentation for all media sampled as part of this SOW,
- A demonstration of attainment of the SSS for soil, groundwater, and surface water, and
- The proposed activity and use limitations necessary to attain and/or maintain the SSS closure strategy.

The RACR shall be prepared in draft form for review and comment by the Solicitor and the PAUSTIF. The selected bidder shall complete the RACR within 60 days following the completion of the final quarterly groundwater sampling event performed as part of this SOW. The timeframe for the completion of the RACR shall provide two (2) weeks for the Solicitor and PAUSTIF to review the RACR and the selected bidder shall address all comments received from the Solicitor and the PAUSTIF before submission of the RACR to the PADEP.

The cost for Milestone H shall be reimbursed as follows:

- Milestone H1 RACR submittal: 75% of proposed Milestone cost
- Milestone H2 RACR approval: 25% of proposed Milestone cost

Milestone I – Preparation of Environmental Covenant. Under this task an Environmental Covenant (EC) shall be prepared and submitted to the PADEP. The preparation of the EC under this Milestone is contingent upon the PADEP approval of the RACR submitted as part of Milestone H. The timeframe for the preparation of the EC shall provide two (2) weeks for the Solicitor and PAUSTIF to review the EC and the selected bidder shall address all comments received from the Solicitor and the PAUSTIF before submission of the EC to the PADEP. Upon execution, the EC shall be recorded with the local courthouse and other required entities.

<u>Milestone J – Well Abandonment and Site Restoration.</u> Under this task all groundwater monitoring wells, recovery wells, sub-slab soil gas sampling points, and soil gas sampling points shall be abandoned and the disturbed area associated with the abandonment shall be restored to match the surrounding area. The well abandonment under this Milestone is contingent upon the approval of the RACR submitted as part of Milestone H and the completion of Milestone I. The groundwater monitoring wells shall be abandoned from the bottom to the top with grout delivered through a tremie pipe. The soil gas sampling points shall be abandoned by removing the sampling tubing from the ground and the sub-slab soil gas sampling points shall be abandoned by removing all equipment and sealing the basement slab penetration with hydraulic cement.

All abandonments shall be conducted in accordance with generally accepted practices as outlined in Appendix A (Groundwater Monitoring Guidance) of the TGM and include the removal and disposal of concrete aprons and manholes.

OPTIONAL and COST ADDER MILESTONES

The activation of Optional Milestones will require the prior approval of the Solicitor and PAUSTIF.

Optional Milestone K – Supplemental Groundwater Sampling. This Optional Milestone is for additional quarterly groundwater sampling events and for a cost adder for the collection and laboratory analysis of one more or one less groundwater sample during a Site visit as part of this SOW.

Optional Milestone K1 – Groundwater Sampling Event. Under this task, one groundwater sampling event shall be performed. The groundwater sampling event shall include the gauging (including depth to SPL if applicable) of all on-Site and off-Site groundwater monitoring wells and the purging and collection of samples for laboratory analysis from nine on-Site groundwater monitoring wells (MW-3, MW-4, MW-7, MW-8, MW-10, MW-10S, MW-18S, MW-22S, and MW-27S) and twelve off-Site groundwater monitoring wells (MW-6, MW-12, MW-12S, MW15S, MW-16, MW-19S, MW-20S, MW-21S, MW-23S, MW-24S, MW-25S, and MW-26S).

Optional Milestone K2 – Cost Adder for Groundwater Sampling. Under this task, the costs for Milestones and Optional Milestones that include mobilization can be adjusted for purging and sampling for laboratory analysis one more or one less groundwater monitoring well. The costs shall include, but not be limited to, labor, equipment, subcontractors, and waste handling.

Optional Milestone L – Monitoring Well Repairs. This Optional Milestone is for major and minor groundwater monitoring well surface completion repairs. Minor surface completion repairs

shall include the replacement of manhole lid bolts, manhole lid o-ring, lockable monitoring well "J" plug, and security padlock. Major surface completion repairs shall include the removal and disposal of the old concrete pad and manhole, the replacement of one existing groundwater monitoring well surface completion, and the replacement of the "J" plug and security padlock.

Optional Milestone L1 – Minor Surface Completion Repair. Under this task, one minor surface completion repair shall be performed as an addition to another Milestone or Optional Milestone that includes mobilization costs.

Optional Milestone L2 – Major Surface Completion Repair. Under this task, one major surface completion repair shall be performed as a stand-alone optional milestone, therefore the costs to perform Optional Milestone L2 shall include mobilization.

Optional Milestone L3 – Major Surface Completion Repair Adder. Under this task, one major surface completion repair shall be performed as an add-on to another Milestone or Optional Milestone that includes mobilization costs.

Optional Milestone M – Preparation of Remedial Action Progress Report. Under this task, a RAPR shall be prepared in accordance with Milestone D to convey to the PADEP data associated with an additional quarterly groundwater sampling event performed in conjunction with Optional Milestone K.

Optional Milestone N – Indoor Air Sampling. Under this task, one indoor air sampling event shall be performed. The indoor air sampling event would include the collection of two indoor air samples and an ambient air sample in general accordance with the TGM.

Optional Milestone O – Risk Assessment. Under this task, a risk assessment shall be performed by a risk assessor to evaluate exposure risks from COCs. All bidders shall assume that the risk assessment will include an evaluation of soil, groundwater, and sub-slab soil gas data for one property.

Optional Milestone P – Preparation of One Additional Environmental Covenant. Under this task an EC shall be prepared for one off-Site property for the review of the Solicitor, PAUSTIF, and the PADEP. Upon execution, the EC shall be recorded with the local courthouse and other required entities.

Additional Information

In order to facilitate PAUSTIF's review and reimbursement of invoices submitted under this claim, the Solicitor requires that project costs be invoiced by the milestone identified in the executed Remediation Agreement. Actual milestone payments will occur only after successful and documented completion of the work defined for each milestone. The selected consultant will perform only those tasks/milestones that are necessary to reach the Objective identified in this RFB. Selected consultant will not perform, invoice, or be reimbursed for any unnecessary work completed under a milestone.

Any "new conditions", as defined in Attachment 2, arising during the execution of the SOW for any of the milestones may result in termination of or amendments to the Remediation Agreement. Modifications to the executed Remediation Agreement will require the written approval of the Solicitor and the PAUSTIF (for funding consideration). PADEP approval may also be required.

List of Attachments

- 1. Bid Submission Coversheet
- 2. Remediation Agreement
- 3. Required Responses Submission Form
- 4. Bid Cost Submission Form
- 5. Site Information/Historic Documents
 - a. Figures 1 through 4
 - Figure 1 Site Location Map
 - Figure 2 Soil Boring Location Map
 - Figure 3 Well Location Map
 - Figure 4 Parcel Identification Map
 - b. Tables 1 and 2

Table 1 – Well Construction Table

- Table 2 Soil Sampling Data
- c. Site Characterization Report May 4, 1998, Chambers Environmental Group, Inc.
- d. Soil Vapor Extraction/Air Sparge Pilot Test Report June 30, 1998, Chambers Environmental Group, Inc.
- e. Comprehensive Environmental Site Characterization Report September 2006, Letterle & Associates, LLC.
- f. Additional Site Characterization Report/Groundwater Monitoring Report April 2011, Letterle & Associates, LLC.
- g. Yearly Progress Report and Pilot Test April 2012, Letterle & Associates, LLC.
- h. Supplemental Site Characterization and Remedial Action Plan September 2017, Converse Consultants
- i. Supplemental Site Characterization and Remedial Action Plan Approval October 31, 2017, PADEP
- j. Draft Environmental Covenant and Interim Response Plan December 27, 2017, Converse Consultants
- k. First Quarter 2018 Remedial Action Progress Report April 25, 2018, Converse Consultants
- I. Fourth Quarter 2019 Remedial Action Progress Report January 2020, Converse Consultants
- m. Fourth Quarter 2021 Remedial Action Progress Report January 2022, Converse Consultants