National Park Service
Business Services Directorate
Contracting Division

STATEMENT OF WORK
Mount Rainier National Park Hazardous Waste Disposal
347663A
PWRO MORA 2026

BACKGROUND

- **Description of the requirement**: An environmental field audit was conducted at Mount Rainier National Park (MORA) in July 2022 by NPS-contractor through the Environmental Audit Program. Among the findings were potentially hazardous waste streams that had not been characterized as hazardous constituents prior to disposal or were stored in lieu of disposal throughout the Park. A parkwide hazardous materials inventory was completed by the Park Safety Manager in 2024, verifying multiple sources of hazardous or potentially hazardous waste at multiple locations across the park. A significant percentage of the inventoried hazardous waste is classified as 'dangerous.'

  Recommended corrective actions from the 2022 Environmental Audit Program include: (1) Determining whether solid waste is hazardous by sampling, testing, and laboratory analysis; (2) ensure all hazardous wastes are disposed of in accordance with hazardous waste regulations; and (3) discontinue the practice of storing unused, expired, and unknown materials in lieu of disposal. To accomplish this, MORA has proposed a process for an OSHA-compliant environmental services / hazardous waste disposal agency to perform testing and analysis of unknown or unidentified materials, containment and clean up, transfer and disposal of all identified hazardous waste.

- **Purpose/relationship to other projects**: The primary purpose of this project is to properly remove and dispose of a variety of hazardous waste and potentially dangerous materials from numerous locations within the park. This project will meet the recommended corrective actions from the 2022 MORA Environmental Audit Program – Final Findings and Observations Report and to ensure compliance with all applicable state and federal regulations for hazardous/dangerous waste storage, transfer, and disposal.

- **Statutory/regulatory foundation:**
  Performance of the Tasks listed below (see page 3) will involve a cooperative effort between the Contractor, the Washington State Department of Ecology, the Environmental Protection Agency (EPA), and the National Park Service (NPS).

All activities shall be conducted in compliance with the following, as applicable:

- 29 CFR 1910.1200 Hazard Communication Standard
- 40 CFR 260 Hazardous Waste Management System: General
- 40 CFR 273 Standards for Universal Waste Management
- 40 CFR 279 Resource Conservation and Recovery Act (RCRA)
- 40 CFR 761 PCB Manufacturing, Processing, and Distribution in Commerce, and Use Prohibitions
- PSCA (Puget Sound Clean Air Agency) Regulation III, Article 4, Section 4.07 (a) Asbestos Hazard Control Activities

This SOW will comply with the Washington State Department of Ecology's Episodic Generation of Hazardous Waste rule. MORA is a small quantity generator (SQG) of hazardous waste, but this project will involve the disposal of dangerous/hazardous waste as a "planned episodic event." MORA will follow the Rule by notifying the Department of Ecology through *RCAInfo* (EPA's Resource Conservation and Recovery Acct) at least 30 days prior to the planned beginning of the project work. The Contractor shall follow the on-site management, labeling, on-site treatment (if applicable), and off-site disposal requirements of the WA Department of Ecology:

Background materials: An NPS audit by the Environmental Audit Program was completed at the park in July 2022. A key observation was hazardous waste streams that had not been characterized for hazardous constituents prior to intended disposal, or hazardous materials that were stored (or left unattended in outdoor locations) in lieu of disposal. The recommended course of action was to (a) determine whether a solid or liquid waste is considered hazardous (through laboratory analysis or other means), (b) maintaining documentation of the waste determination / characteristics, and (c) ensure all hazardous waste is disposed of in accordance with hazardous waste regulations. An inventory of the hazardous waste type and components, quantity, and location within the park are included as attachment A.

OBJECTIVES

- **Goals and objectives of the contract effort:** The contractor will work with the National Park Service to:
  - Test and analyze the contents of storage drums, discarded transformers, and other unidentified (unlabeled) waste.
  - Contain and clean-up spilled hazardous materials in a single HAZMAT storage unit.
  - Properly package, transport, and dispose of all identified hazardous waste in accordance with state and federal regulations.
  - Maintain records and ensure proper documentation of testing, analysis, results, quantity, and other requirements for state and federal reporting,

Intended use of the results or end products: The intended use of results of this contract is to remove all identified hazardous waste/dangerous materials from within the park and ensure they properly handled and documented disposal of these materials.

SCOPE

Scope of the contract: MORA expects to have all hazardous waste, including known and unknown materials, to be safely removed from within the park and properly disposed of according to state and any federal regulations. The scope of this project includes the testing and assessment (or analysis) of some materials that are suspected to be hazardous (and potentially dangerous) and then properly handled and disposed of in accordance with state and federal regulations.

TASKS

Performance of the following tasks will involve a cooperative effort between the Contractor, the Washington State Department of Ecology, the Environmental Protection Agency (EPA), and the National Park Service (NPS).

TASK 1: PROJECT MANAGEMENT

The Contractor shall select an employee who will serve as the Project Manager (PM). This individual shall oversee the coordination of the entire project, administer all instructions from MORA, and answer or obtain answers to all questions from MORA during and after the project. If the Project Manager for the project changes, the Contractor is to notify the MORA Project Manager and Contracting Officer in writing two weeks prior to the change. If the change is due to an emergency, MORA shall be notified as soon as the change occurs.

1.1 Initial Site Assessment Walk-through: The purpose of the initial site assessment and walk-through is to identify the locations, type, size, access, and other critical information necessary to implement the tasks for this project. This site walk-through should take place within the first two business weeks of the contract being awarded and will be documented by the Contractor. A report of observations, immediate assessment of conditions, concerns, and/or request for more information from the NPS PM will be provided by the Contractor.

1.2 Kick Off Meeting: An initial kick-off meeting will take place with the Contractor, Contracting Officer, Project Managers (NPS and Contracted), and Park Safety Manager will take place to review the project objectives and tasks. This meeting will be scheduled within 10 business days of the Task Order award on the Longmire site with the COR and project manager at the Longmire site.

1.3 Project Schedule: The Contractor shall submit a project schedule within ten (10) business days of the Task Order award showing the periods in which the work will be performed to complete the tasks. The Contractor shall update and resubmit the schedule as soon as changes are made.

1.4 Documents and Previous Audit Reports

The government (NPS/MORA) will provide all available and accessible documentation pertaining to the project. This includes the hazardous materials inventory, all Safety Data Sheets (SDS) for known products, and relevant WA State Department of Ecology rules and regulations.

The contractor will provide the following:

- ***Project Schedule*** (see requirement 1.3 noted above).

- ***Information necessary for the park to complete the following WA Department of Ecology reports:***
  - *Generation and Management (GM) Form*
  - *Off-Site Identification (OI) Form*
  - *Pollution Prevention (P2) Plan* [if required]
  - *Tier Two reporting* [if required].

- ***Site-Specific Safety Plan (SSSP)***
  A SSSP is a written plan that outlines the scope of the proposed work, the hazards and risks associated with this scope, the safety practices and mitigations to be taken for identified hazards and risks, contractor roles and responsibilities, and any additional pertinent program elements or requirements for specific projects. A SSSP shall be developed and implemented by the Contractor and is job-specific to the tasks they are performing for the NPS.

- ***Decontamination Plan:*** Procedures for removing or neutralizing contaminants that have accumulated on personnel and/or equipment during hazardous material handling. A decontamination plan should be developed (as part of the Site Safety Plan) and set up before any personnel or equipment may enter areas where the potential for exposure to hazardous substances exists. The decontamination plan should:
  - Determine the number and layout of decontamination stations.
  - Determine the decontamination equipment needed.
  - Determine appropriate decontamination methods.
  - Establish procedures to prevent contamination of clean areas.
  - Establish methods and procedures to minimize worker contact with contaminants during removal of personal protective clothing and equipment (PPE).
  - Establish methods for disposing of clothing and equipment that are not completely decontaminated.

  The plan should be revised whenever the type of personal protective clothing or equipment changes, the site conditions change, or the site hazards are reassessed based on new information.

- ***Monitoring and Compliance Plan:*** Process and procedures for continuous monitoring to ensure compliance with safety regulations and to protect the health and safety of workers and the surrounding environment.

TASK 2: HAZARDOUS MATERIAL TESTING

2.1 Sampling from and testing fluids from old transformers and oil generators for potential PCBs.

2.2 Sampling and testing of unknown contents of 55-gallon metal drums.

2.3 Sampling and testing of small-quantity containers of unknown contents which may be potential HAZMAT.

Task 3: Containment and Cleanup (Longmire Waste Water Treatment Plant)

3.1 The wastewater treatment plant located in Longmire has a hazardous material storage container with a small amount of calcium hypochlorite (approximately 40-45 pounds), sodium fluoride (approximately 75 pounds in three 25 pound bags) in containers that have disintegrated and require packaging and handling in accordance with the product's SDS. These products must be removed in compatible, corrosion-resistant containers with secondary containment (as required). This containment will include the provision of necessary personal protective equipment (PPE) for contractors performing the containment, as well as suitable storage containers for transport off-site for disposal.

3.2 The hazardous material storage trailer/container must be prepared for removal by ensuing it is empty, clean, and free of hazardous residues or treating it as hazardous waste (and following hazardous waste disposal rules). The trailer/storage container measures 23'L by 9' W x 9' H (approximately 1800 square feet) with an estimated weight of (TBD) pounds.

TASK 4: PREPARATION, TRANSFER AND DISPOSAL OF HAZARDOUS WASTE

4.1 Transformer and oil generator pump outs (if required).
4.2 Disassemble and decontaminate PCB-contained transformers (if applicable).
4.3 Container pump out, over pack containers, diesel tanks.
4.4 Packaging (glycols, hazardous semi-solids, high BTU PCB liquids, Lab Packs (or similar packing material) for incineration, elemental mercury for treatments/stabilization, Lab Pack of reactives (i.e, ammonia reagents).
4.5 Transportation to off-site licensed hazardous waste disposal facility(ies).

TASK 5: REPORTING AND DELIVERABLES

5.1 Submission of reports on transformer testing for possible PCBs, soil sampling analysis [if applicable].
- Collect and submit to NPS all information required for the WA Department of Ecology *Dangerous Waste Report**, to include:
- Generation and Management (GM) Form
- Off-Site Identification (OI) Form
- Pollution Prevention (P2) Plan [if required]
- Tier Two reporting [if required]

*MORA will be responsible for completing and submitting the *Dangerous Waste Report* and all required supporting documentation.

Task Number	***Work Milestones***	***Projected Completion Date***
1.1	Initial site assessment/walk-through	Date 10 business days after award
1.2	Kick-Off Meeting (NPS and Contractor)	Date 10 business days after initial site visit
1.3	Establish Project Schedule	Date 10 business days after kickoff
1.4	Submit Site-Specific Safety Plan, Decontamination Plan, and Monitoring and Compliance Plan for review and approval	Prior to start of on-site work, will require review and approval 10 business days
2.1 to 2.3	Conduct sampling and testing of fluids from old transformers and generators, unknown contents of 55 gal metal drums, and small quantity containers of unknown contents; report findings from analyses.	Date- 80 business days after award
3	Perform any necessary containment and clean up of materials in HAZMAT storage trailer (single location).	Date within 80 days after award
4	Preparation of HAZMAT for Transfer and Disposal	Date within 120 days after award
5	Submit required documentation and data for MORA to complete Dangerous Waste Report	Date within 250 days after award

DELIVERY

- **Deliverables:**
  - *Project Schedule*
  - *Site-Specific Safety Plan (SSSP)*
  - *Decontamination Plan*

- *Monitoring and Compliance Plan*
- *Information necessary for the park to complete the following WA Department of Ecology reports:*
  - *Generation and Management (GM) Form*
  - *Off-Site Identification (OI) Form*
  - *Pollution Prevention (P2) Plan* [if required]
  - *Tier Two reporting* [if required]
  - *Dangerous Waste Report*

Place of Performance

The work will be performed within the Mount Rainier National Park boundaries at the following locations:

- Primary location: Longmire maintenance area in the Longmire Historic District (located 6 miles from the park entrance at Nisqually, see map).

- Secondary locations:
  - Tahoma Woods scrapyard (located in Ashford, approximately 7 miles from the Nisqually entrance to the park); noted on map below as 'Administrative Office of Mount'
  - Kautz Creek scrapyard (located 3 and ½ miles within the park from the Nisqually entrance).
  - Narada Maintenance Building (located 17 miles from the park entrance.

- Off-site transfer and disposal to licensed hazardous waste facility/facilities (TBD).

Note – Access to the waste water treatment plan at Longmire, one of the hazardous chemical collection and disposal sites, is accessible by a U.S. Forest Service Road to an employee entrance gate. This road may have restricted access in the winter, requiring a park employee to

meet the contractors on the USFS road and escorting them to the park boundary. The park may limit road or work area access or close specific park areas due to adverse weather conditions (such as snow, flooding, windstorm, etc.); this may affect the work schedule and would be communicated with the contractor as soon as park leadership decides on road closures.

Period of Performance

The Contractor shall commence work under this contract immediately after the date the Contractor receives the Notice to Proceed (NTP). The period of performance is 250 days from the Task Order award.