

**Fort Belknap Indian Community
USEPA Brownfields 128(a) BIL Funding
Runway Homes Cleanup Project
Work Plan**

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1.0 Introduction

Granite Peak Environmental, LLC (“Granite Peak”) is pleased to submit this work plan for Qualified Environmental Professional (QEP) services to assist the Fort Belnap Indian Community (FBIC) Environmental Protection Department. FBIC was recently awarded U.S. Environmental Protection Agency (USEPA) 128(a) BIL funding to assist with site abatement and remediation at the Runway Homes site.

2.0 Scope of Work

The following sections describe how our team will approach specific tasks outlined in FBIC’s EPA-approved work plan.

2.1 Public Outreach

2.1.1 Informational Materials

Granite Peak will assist FBIC with various forms of communication to update community leaders, stakeholders, landowners, and the local media on site and project progress, including:

- **Community Outreach Plan** – Granite Peak will develop a Community Outreach Plan for FBIC that will provide an overarching strategy for public communications before, during, and after the cleanup activities. Specific information will include plans for how FBIC will communicate public meetings details, solicit public input on cleanup plans, how community input will be addressed and incorporated into the final cleanup plan, and how the final cleanup results will be presented to the community.

Deliverable(s): 1 Community Outreach Plan

Timing: May 2024

- **Fact Sheets**- After cleanup of the site is complete, a fact sheet will be prepared explaining the findings of the Phase II assessment, the cleanup actions taken, any residual contamination, and redevelopment plans for the site. These fact sheets can be utilized by the tribe, EPA, other tribal departments, and community stakeholders to help explain the project in a way that is easy for the reader to understand and can help provide background information for redevelopment funding applications.

Deliverable(s): 1 Fact Sheet

Timing: After cleanup completion – Approximately September 2024

2.1.2 Public Meetings

Granite Peak will assist FBIC with a public meeting to keep community stakeholders up to date on the progress of the cleanup activities. The ABCA will be presented to the public, and the public will be given an opportunity to comment on the document prior to abatement and cleanup commencing. Granite Peak staff will also be available to present to tribal council members and FBIC staff to address any concerns they may have prior to and after the cleanup.

Deliverable(s): Meeting materials for 1 public meeting; Attendance at 1 public meeting

Timing: Approximately June 2024

2.2 Cleanup Planning

2.2.1 Quality Assurance Project Plan (QAPP)

Granite Peak will update FBIC's existing QAPP which will document how Granite Peak will ensure reliable data is derived from the field events and how that data will be analyzed to meet the project's overall goals and objectives. Information to be included in the document includes project organization and team members; sampling approach; sampling procedures; testing and measurement protocols; quality control measures; data reporting; and data validation. Granite Peak will also update FBIC's existing building materials sampling guide as an appendix to the QAPP that will detail how abatement clearance sampling will be completed. The draft QAPP will be submitted to both FBIC and EPA for review along with an EPA Region 8 crosswalk.

Deliverable(s): 1 updated QAPP; 1 updated Building Materials Sampling Guide; 1 EPA Crosswalk

Timing: May 2024

2.2.2 Final ABCA

Granite Peak will review the previously drafted ABCA, revisit project goals with FBIC stakeholders, present the ABCA at the public meeting (see Section 2.1.2), incorporate any public feedback, and finalize the ABCAs. Final drafts of the ABCAs will be submitted to FBIC and EPA for review and approval.

Deliverable(s): 1 Final ABCA

Timing: May 2023

2.2.3 Cleanup-Remediation Verification Plans and Site-Specific Clearance SAPs

Project cleanup for the site will be designed to achieve the most efficient and effective remediation possible. Granite Peak will draft and complete a Cleanup-Remediation Verification Plan that will include a site-specific clearance SAP for the site. When designing the cleanup plan, Granite Peak will work with Mr. Michael Black Wolf and Ms. Emma Filesteel, FBIC Tribal Historic Preservation Officers, to ensure the cleanup does not adversely affect the historic integrity of the site, per EPA requirements. Given that 27 of the original 30 homes have burned and asbestos-containing ash may have migrated to surrounding surface soils, surface soil sampling will be proposed to EPA in the SAP. Soil samples will be collected in accordance with the SAP, and a technical memo will be drafted with the results of the sampling. Samples will be submitted to EMSL Analytical, Inc. for analysis. The SAP will also explain what building materials contain hazardous materials, materials to be abated, how confirmation sampling will be completed, safety protocols, standard operating procedures, and additional considerations for contractor oversight. Each plan will include a site-specific Health and Safety Plan (HASP) as well as a Site Security Plan (SSP).

Deliverable(s): 1 Cleanup-Remediation Verification Plan to include 1 Site-Specific SAP, HASP, and SSPs. Soil sampling for asbestos and 1 technical memo citing results.

Timing: May 2024

2.3 Cleanup Oversight

Granite Peak will oversee the removal and disposal of all contaminants to ensure the cleanup is completed in accordance with the EPA approved cleanup plans and all state, federal, and tribal regulations. Mr. Ryan McGee meets all OEP qualifications and will be onsite for the duration of the cleanup. He will also complete clearance sampling to confirm all contamination has been removed. Granite Peak will conduct Davis-Bacon Wage interviews and review certified payroll reports from the cleanup contractors to verify federal prevailing wage rate requirements have been met before any invoice is paid. Our team will provide reconciliation reports to FBIC to confirm all abatement and cleanup work is being completed on budget and in accordance with the abatement contract. Granite Peak will also review all disposal tickets to confirm contaminants were disposed of properly.

Deliverable(s): Davis Bacon Wage Interviews; Confirmation Sampling; Certified Payroll Report Reviews; Invoice Approvals; Disposal Ticket Approvals

Timing: July 2024

2.4 Cleanup Reporting

Once cleanup is complete, Granite Peak will prepare a final cleanup report documenting site cleanup activities. The report will include a written summary of cleanup activities as well as confirmation sampling. The report will include laboratory reports of the confirmation sampling, field forms, photos, data validation, data analysis, and waste manifests to document disposal.

Deliverable(s): 1 Draft and Final Cleanup Report

Timing: September 2024

2.5 Project and Grant Management

Granite Peak will assist FBIC with completion of EPA quarterly reports, EPA Assessment Cleanup & Redevelopment Exchange (ACRES) reports, Disadvantaged Business Enterprise (DBE) annual reports, and close out reports. Granite Peak is committed to exceptional project management. To achieve this, we will provide the following specific project management tasks:

- Monthly budget updates, budget tracking, and project update summaries that include:
 - Invoicing detailing costs incurred by workplan task
 - Budget utilization, funds remaining
 - Upcoming tasks for the following week/weeks
 - Project activities accomplished by workplan task during the reporting period, including percentage of work completed/work remaining
 - Costs incurred by workplan task for reporting period
 - Funds/balance remaining
 - Anticipated activities during the next reporting period
 - Expected changes in scope, schedule, key personnel, or budget

- Any significant developments, such as unexpected obstacles, delays, budget changes, successes, milestones, etc.
- Client phone calls, e-mails, and virtual meetings, as needed
- Team and project coordination
- Cost estimates for each task to be approved by the client prior to the work commencing
- Communication with the client and EPA to clarify project considerations and objectives, as needed

Deliverable(s): Monthly Progress Report; 1 Final Report; Monthly Invoices

Timing: May 2024 – September 2024