

## GENERAL ENVIRONMENTAL CONSULTING SCOPE OF WORK

The Scope of Work for General Environmental Consulting for the Maine Turnpike Authority (Authority) is presented in the following task summaries below.

### Task 1: Environmental Training

The Consultant shall assist the Authority in complying with federal and State requirements under (but not limited to) the following regulatory programs:

- Federal EPA Resource Conservation and Recovery Act (RCRA) and associated MaineDEP personnel training for hazardous and universal waste generators (40 CFR 26.16 and Code of Maine Rules [CMR] Chapter 850 and 851);
- Emergency Planning and Community Right-to-Know Act (EPCRA) and associated Maine Emergency Management Agency (MEMA) requirements for Emergency Response Plans;
- United States Department of Transportation (USDOT) personnel training for employees involved in the transport and management of hazardous materials (49 CFR 172.700);
- Federal Oil Pollution Prevention regulations (40 CFR 112) and the Authority's facility-specific SPCC plans and program;
- State Stormwater Pollution Prevention personnel training to address management standards associated with the Authority's MS4 Permit as well as erosion prevention and sedimentation control measures associated with MaineDEP Stormwater Management Rules (CMR Chapter 500), the MCGP and other erosion and sedimentation control requirements; and
- Other training related to on-going environmental compliance and/or hazardous materials management as requested by the Authority.

In general, the services may include conducting both initial and refresher level training; updating, modifying, and/or creating training materials, workshops/practical exercises and test/exams; providing training certificates and other training documentation, including (but not limited to) tracking examination scores as process and/or impact parameters for annual reporting requirements (e.g., MS4 permit); and other related tasks as requested by the Authority's Environmental Services Coordinator. Training shall be provided at Authority maintenance facilities and/or headquarters building on dates approved by the Authority's Training Coordinator.

The following environmental training sessions are anticipated:

- **SPCC/Stormwater/ESC Training:** Generally, the Authority requires up to seven 4-hour training sessions for Maintenance and Engineering personnel to attend, which includes sessions held at Highway and Equipment Maintenance Facilities, the Cumberland Sign Shop and one make-up session held at Authority Headquarters. Included in the 4-hour training session is Mobile SPCC training for Highway Maintenance Supervisors and Foremen that are responsible for operating vehicles with mobile refueling tanks. As part of this contract, the Consultant shall **conduct up to three** of these training sessions to assist the Authority in complying with regulatory personnel training requirements under, but not limited to, the federal Oil Pollution Prevention regulations (40 CFR 112), as well as the Maine Discharge Elimination System (MEPDES) General Permits (e.g., MS4 and MCGP) and Stormwater Management (Chapter 500). The remainder of the sessions shall be conducted by Authority staff; however, the Consultant shall provide training materials, documentation, and other preparatory support for all nine of the training sessions.

In addition to Maintenance and Engineering personnel, the Authority provides two 2-hour condensed sessions of SPCC/Stormwater/ESC training for Fare Collection Managers, Supervisors and acting capacity managers/supervisors to be held at Authority Headquarters to ensure that spill response procedures and regulatory notification obligations are implemented appropriately throughout Authority facilities. The Consultant shall **conduct one** of these two sessions and provide training materials, documentation, and preparatory support for both of these sessions.

- **Hazardous and Universal Waste Training:** Generally, the Authority requires up to seven 3.5-hour refresher training sessions for Maintenance and Engineering personnel to attend, which includes sessions held at Highway and Equipment Maintenance Facilities, the Cumberland Sign Shop and one make-up session held at Authority Headquarters. Included in the 3.5-hour refresher training session is EPCRA Emergency Response Plan Training which is associated with the storage of extremely hazardous substances (i.e., sulfuric acid in batteries) above specific thresholds. As part of this contract, the Consultant shall **conduct up to three** of these refresher training sessions to assist the Authority in complying with regulatory personnel training requirements under, but not limited to, the federal RCRA management standards for hazardous waste generators (40 CFR 265.16) and associated MaineDEP standards for hazardous and universal waste management (Chapters 850 and 851). The remainder of the refresher sessions, as well as one initial training session for new employees, shall be conducted by Authority staff; however, the Consultant shall provide training materials, documentation, and other preparatory support for all of these training sessions.

In addition to Maintenance and Engineering personnel, the Authority provides two, 2-hour condensed refresher sessions for custodial staff and Fare Collection Managers, Supervisors and acting capacity managers/supervisors to be held at Authority Headquarters to ensure that State and federal hazardous and universal waste management requirements are implemented appropriately throughout Authority facilities. The Consultant shall **conduct one** of these two sessions and provide training materials, documentation, and preparatory support for both of these sessions.

- **Other Environmental Training:** The Authority also provides the following additional environmental training for which the Consultant may provide support in conducting and shall provide training materials, documentation, and preparatory support .
  - **US DOT Hazardous Materials Training:** The Authority provides training to Foremen, Supervisors and some members of management to ensure that there are Authority representatives adequately trained and available to sign hazardous waste manifests in the event the Authority's Environmental Services Coordinator is unavailable. The Consultant shall **conduct one** 3.5-hour training session, likely at Authority Headquarters, to assist the Authority in complying with regulatory personnel training requirements under, but not limited to, the federal RCRA management, MaineDEP rules and USDOT standards (49 CFR 172.700).
  - **Air Emissions Training:** Surface coating operations, like the Autobody Paint Booth at the Gray Maintenance Facility, are subject to 40 CFR 63 Subpart HHHHHH, which requires annual training to include the following:
    - A list of all current personnel (name and job description) requiring training;
    - Hands-on and classroom instructions (initial and refresher training) regarding equipment selection, spray technique, booth and filter maintenance, as well as environmental compliance; and
    - A description of the methods to be used at the completion of the initial and refresher training.

The Authority subcontracts with a qualified vendor to provide input relative to techniques/methods and maintenance of the surface coating equipment. However, the Consultant shall assist the Authority by developing a summary of the environmental compliance considerations to fulfill the associated training requirements and shall provide the appropriate training documentation (e.g., list of personnel; describe methods discussed during training, etc.).

#### Task 2: SPCC Compliance Assistance

The Consultant shall assist the Authority in complying with the federal Oil Pollution Prevention regulations (40 CFR 112) and maintaining up-to-date facility-specific SPCC Plans. In general, the services include updating/revising text, tables and diagrams of existing SPCC Plans to reflect operational, personnel or other applicable changes at each maintenance facility; maintaining an up-to-date mobile SPCC plan for refueling practices; preparing documentation for aboveground storage tanks subject to registration/permitting with the State Fire Marshal's Office and/or other regulatory authorities; and other tasks associated with maintaining an up to date SPCC Plan for each of MTA's seven Highway and Equipment Maintenance Facilities, as requested by the Authority.

#### Task 3: Wastestream Sampling, Characterization and Profiling

The Consultant shall assist the Authority in managing regulatory obligations for waste streams generated as part of operating and maintaining Authority equipment and facilities in accordance with federal, State, and local solid, special, universal, hazardous and other (e.g., biohazard, etc.) waste requirements.

In general, environmental services provided by the Consultant to assist the Authority in maintaining up-to-date information on the routinely generated waste streams at Authority facilities include, but are not limited to, coordinating sample bottle deliveries for analytical testing under standard chain-of-custody procedures; preparing sample bottles, containers/coolers, materials, equipment and procedures to facilitate sample collection to be conducted by the Consultant and or Authority personnel; managing data provided by Authority's subcontracted laboratory; communicating with the Authority's subcontracted laboratory personnel as needed; preparing documentation to properly characterize and profile the waste(s) for transportation and disposal, as needed; preparing semiannual reports in accordance with Authority's permit conditions with the Kennebec Sanitary Treatment District; assisting with annual hazardous and quarterly universal waste reporting requirements; and providing additional support to maintain accurate waste characterization information throughout Authority facilities for individual hazardous and non-hazardous waste streams.

In addition to the services described above, the Consultant shall also be prepared to assist the Authority with guidance (pertaining generally to new and/or non-routine wastestreams that arise from time to time) by providing written recommendations that may include consultation with MaineDEP representatives if specific interpretations are required or should be documented in official file records for compliance purposes.

#### Task 4: Annual EPCRA Assistance

The Consultant shall assist the Authority in complying with the requirements of EPCRA by preparing Tier Two reports for eight substances: gasoline, diesel, propane, sand, salt, No. 2 fuel oil, sulfuric acid, salt brine and magnesium chloride.

To complete this task, services include consulting with Authority personnel regarding materials usage and storage data; communicating and coordinating with Authority accounting personnel regarding deliveries of materials; providing supporting documentation for the Tier Two reports for Authority files; completing the

electronic files for submission to the appropriate regulatory agencies; and assisting with other tasks as required to comply with the annual reporting requirements. The cost of the Authority's annual inventory/registration fees due to the Maine Emergency Management Agency is approximately \$3,925. The Consultant shall make direct payment on behalf of the Authority, with the accompanying annual reporting documentation by March 1, each year. The annual fee shall be considered a direct expense and shall be reimbursed at actual cost.

#### Task 5: Annual Air Emissions Assessment

The Consultant shall assist the Authority in evaluating the potential regulatory requirements of the MaineDEP air emissions regulations set forth in the CMR Chapters 2 through 147, as well as periodic evaluation of Authority operations relative to federal standards (e.g., 40 CFR 63). The Consultant shall evaluate the Authority's air emissions inventory at maintenance facilities (including the Cumberland Sign Shop) and various operations performed at each location to determine status, applicability, and recommended action items relative to applicable air regulations. The Consultant shall rely on information from the Authority regarding new or modified devices and/or operations.

The Consultant shall provide assistance and evaluations relevant to recent regulatory changes pertaining to emergency generator usage (40 CFR 63 Subpart ZZZ) and autobody finishing operations (40 CFR 63 Subpart HHHHHH). In addition to following up on initial evaluations conducted in 2011, the Consultant may also be required to prepare annual reports to USEPA by March for the autobody finishing operations; review materials safety data sheets (MSDS) for products that contain target hazardous air pollutants and volatile organic compounds; update SOPs and documentation for routine painting operations conducted by MTA's Highway and Equipment Maintenance crews; update or prepare addendums to the current air emissions survey for Authority properties, by updating calculations associated with potential paint usage, fuel burning, monthly/annual gasoline and diesel, parts washer solvent usage, and other processes/equipment contributing to potential air emissions; and other tasks associated with assisting Authority in maintaining an accurate inventory of air emissions sources.

#### Task 6: Other "As-Needed" Regulatory Assistance

The Consultant shall be available to provide continued specialized services, in addition to those presented above, on an "as-needed" basis and upon the specific request of the Authority. The intent of these additional assignments is to address the Authority's immediate needs for ongoing technical assistance and compliance for other environmental programs or issues should they arise. This task has included the following projects in the past several years:

- Reviewing remedial action reports and plans associated with the on-going work conducted by a Subconsultant, for example, from a 10,000-gallon tanker rollover at the Saco Interchange;
- Conducting (e.g., overseeing and documenting) cleanup efforts resulting from contaminated soils discovered during construction activities or operations;
- Updating Hazardous Waste Contingency Plans, Training Plans, SOPs and other similar documents;
- Responding to solid waste management inquiries; and
- Evaluating other regulatory programs, permits, etc. relative to Authority operations and/or activities.
- Providing emergency spill response coverage and guidance to MTA, during the temporary absence of the MTA Environmental Services Coordinator when he is sick, and or on vacation or unavailable for other reasons.