

HERCULES

Project Management Plan

USEPA RCRA 3013(a)

Administrative Order

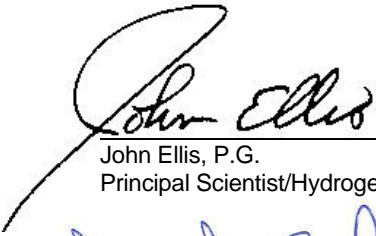
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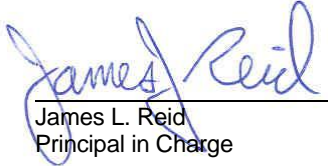
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Hattiesburg, Mississippi

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Hattiesburg, Mississippi

1. Project Organization and Responsibilities

This Project Management Plan (PMP) has been prepared to support the Phase 1 Sampling and Analysis Work Plan (Work Plan) by documenting mechanisms that will be implemented to ensure the investigation undertaken by Hercules Incorporated (Hercules), in Hattiesburg, Mississippi, pursuant to the May 9, 2011, Administrative Order (AO) issued by Region 4 of the U.S. Environmental Protection Agency (USEPA) pursuant to Section 3013(a) of the Resource Conservation and Recovery Act (RCRA), 42 United States Code (USC) §6934(a), is performed in accordance with the requirements of the AO.

Hercules will review this PMP periodically to ensure its continued applicability. Laboratory control limits will be updated annually or as re-calculated by the analytical laboratory. The Project Manager (PM) will be responsible for initiating the review and update. If the review indicates additions or changes are required, the PMP will be updated by preparing changes to specific sections.

The information presented in this PMP covers general procedures for implementing applicable USEPA guidance and Mississippi Department of Environmental Quality (MDEQ) requirements to ensure that data of verifiable quality are generated. This is necessary to ensure the validity of the results of the investigation. Hercules' Subcontractors will also be contracted to perform activities in accordance with this PMP. The analytical laboratory will perform analyses in accordance with USEPA-approved methods and as further defined by the laboratory standard operating procedures, as well as the project's Quality Assurance Project Plan (QAPP) and the Work Plan requirements.

This PMP addresses the general activities that may be performed in accordance with the AO to achieve the project objectives. The investigation is being performed under the direction of the USEPA to assess the presence, magnitude, extent, direction, and rate of movement of any of the constituents to be monitored under the AO (the "Constituents").

An environmental contractor will be selected to perform and oversee the field operations as well as compile and submit the final report on behalf of Hercules. Accredited contract laboratories will be selected to provide analytical support. Geotechnical work will be performed by a water well driller licensed in the state of Mississippi.

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The PM and Field Operations Manager are primarily responsible for the implementation of the PMP and quality assurance and quality control (QA/QC) programs on the project. The specific QA responsibilities of the key project personnel are described in the QAPP. The organizational chart for the project is provided as Attachment A.

1.1 Project Manager

The selected contractor will identify a PM for the project. The PM will oversee the implementation of all schedules and budgets. He will establish and interpret all contract policies and procedures and access appropriate resources in order to maintain technical quality. The PM will work with the Field Operations Manager and QA Manager to resolve any QA/QC issues during the implementation of the site activities.

The PM is responsible for all field activities. The PM will also be responsible for reviewing any new work not currently defined to determine whether the PMP will require amendments or modifications. In addition, the PM is responsible for distributing all site-specific plans and related documents to the Field Operations Manager and the Laboratory PM, who in turn distribute it to the appropriate technical staff. Specific PM responsibilities include:

- Overseeing day-to-day task performance including all technical and administrative operations;
- Coordinating with the Hercules PM;
- Tracking schedules and budgets and management of mobilization and contract closeout activities;
- Performing assessment and oversight duties as described in the Work Plan;
- Selecting and monitoring technical staff;
- Reviewing and approving all final reports and other work products; and
- Distributing the QA/QC Plan and the site Health and Safety Plan to the technical staff and subcontractors.

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1.2 Field Coordinator/Field Operations Manager

The contractor will provide a Field Coordinator/Field Operations Manager for the project. As Field Coordinator, the selected individual will interface between the PM and subcontractors to ensure that all personnel, supplies, and equipment necessary for completion of field activities are available. In the role of Field Operations Manager, the selected individual will coordinate and be present during all sampling activities and will ensure the availability and maintenance of all sampling materials/equipment. The Field Operations Manager will be responsible for the completion of all sampling and chain-of-custody documentation and the overall quality of work performed during the investigation at the site as it relates to the following specific responsibilities:

- Implementation of the field activities in accordance with the Work Plan;
- Management of field staff during the investigation, including health and safety procedures; and
- Coordination of site work including subcontractor access to and work at the site.

1.3 QA Manager

The Project QA Manager will be responsible for oversight of all site QA/QC activities. The QA Manager will remain independent of day-to-day direct project involvement, but will have the responsibility for ensuring that all project and task-specific QA/QC requirements are met. The QA Manager's specific duties include:

- Reviewing and approving the QA/QC Plan;
- Reviewing and approving substantive changes to the QA/QC Plan;
- Reviewing any new work orders with the PM to determine if the QA/QC Plan requires modification;
- Providing external review of field and analytical activities by performance of assessment and oversight duties; and
- Conducting field audits and keeping written records of those audits.

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1.4 Project Health & Safety Manager and Site Safety Officer

The Project Health and Safety Manager (PHSM), or designee, is responsible for overseeing all aspects of the site safety program and preparing any site-specific health and safety guidance documents or addenda to this plan. The PHSM does not report to the PM and is separately accountable to the contractor's senior management for site health and safety.

1.5 Task Manager and Technical Staff

The Task Manager and technical staff for this program will be specified in advance by the contractor. The technical staff will implement project and site tasks, analyze data, and prepare reports/support materials as directed by the Task Manager. All personnel assigned will be experienced professionals who possess the degree of specialization and technical competence required to perform the required work effectively and efficiently. Project personnel will hold current certifications documenting appropriate training for assigned tasks, as required.

1.6 Analytical Laboratory

The analytical laboratories providing analytical services will be chosen as appropriate for the project requirements. The analytical laboratory shall be accredited for the analytical parameters required for the project and covered under the scope of the certification programs. The laboratory QA programs will be reviewed by the QA Manager. The laboratory must provide an experienced PM to coordinate between the QA Manager and the laboratory. The laboratory staff shall include a QA Officer/Coordinator who is independent of the day-to-day operations of the laboratory. The specific duties of each Laboratory PM and Laboratory QA Officer on the project include:

- Reviewing the QA/QC Plan to verify that analytical operations will meet project requirements;
- Documenting and implementing site-specific QA/QC requirements in the laboratory and reviewing analytical data to verify the requirements were met;
- Reviewing receipt of all sample shipments and notifying the Field Operations Manager of any discrepancies in a timely fashion;

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- Conducting internal laboratory audits to assess implementation of the QA/QC Plan and providing written records of those audits;
- Providing rapid notification to the contractor's PM regarding laboratory nonconformance with the QA/QC Plan or analytical QA/QC problems affecting samples; and
- Coordinating with the project and laboratory management to implement corrective actions as required by the QA/QC Plan or laboratory Quality Assurance Manual.

1.7 Other Subcontractors

The drilling, probing, surveying, and/or other subcontractors are responsible for implementing the subcontracts and applicable portions of this PMP as provided in the subcontract package. Subcontractors are responsible for rapidly notifying the Field Operations Manager regarding nonconformance with the PMP or QAPP problems affecting the project. Subcontractors must coordinate with the Field Operations Manager to implement corrective actions required by the contractor.

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Attachment A

Organizational Chart



Organizational Chart

Phase I Sampling and Analysis Work Plan

