



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP - 4 1992

OSWER Directive #9202.1-06

SUBJECT: Initiatives to Streamline the Alternative Remedial Contracting Strategy (ARCS) Contracts' Award Fee Process

FROM: Timothy Fields, Jr., Director
Superfund Revitalization Office

David J. O'Connor, Director
Procurement and Contracts Management Division

TO: Addressees

Purpose

The purpose of this directive is to delineate changes to the ARCS award fee process which will streamline the current system for evaluating contractors' performance.

Background

In October of 1991, the Agency issued a report by the Administrator's Task Force on implementing the ARCS contracts. Several recommendations contained in this report discussed improvements needed to the award fee process currently used in the ARCS contracts. Among these the most significant included:

"....Contractors' accomplishments with regard to lowering program management costs and adherence to national targets would receive significant consideration in the award fee process."

"Regional Administrators, in cooperation with the Office of Administration and Resources Management and the Office of Solid Waste and Emergency Response, should establish regional or zonal teams to evaluate and report within 120 days on recommendations to streamline the award fee system with particular

attention to the paperwork burden and issues of national consistency. Teams should also be charged to examine the Performance Index Rating Score to determine if it is the best tool to capture performance and translate it into a criterion for the assignment of new work."

Region II, serving in the capacity as the lead Superfund Region, engaged in an extensive workgroup effort to evaluate the current award fee process and make recommendations for streamlining burdensome areas. The recommendations were submitted to the Acting Acquisition Manager for Superfund on June 8, 1992, and she took these recommendations to the ARCS Council for deliberation and consensus. The Council members reached agreement on the majority of the recommendations at the June 18, 1992 Council meeting.

Objective

The key decisions made by the ARCS Council are summarized in the following sections:

*** Contractors' Self Evaluations**

Contractors' self evaluations will be limited in length and scope to enable the Performance Evaluation Board to focus on the most critical areas where their input is needed. Region-specific limitations will be determined by each ARCS Regional Management Team (RMT); however, each Region should ask for at least one page for program management, two pages for key highlights on remedial planning, a very short summary of remedial design and construction and a matrix of scores for work assignments which are to be evaluated in the period. Packages should not exceed ten pages in length. However, in cases where performance problems are evident, the contractor's self-evaluation may contain an appendix that states their views and corrective actions taken.

*** Threshold for Evaluation of Work Assignments**

Each Regional RMT will establish a threshold number of hours for evaluation of work assignments. Consideration should be given to the significance of the work assignment and the administrative burden associated with its evaluation. A general guideline for RMTs to consider is 80 hours of work performed within the period. Some work assignments below this level may need evaluation and each PEB should determine which areas fall into this category (i.e., unsatisfactory performance, etc.)

The fee associated with work assignment hours not evaluated will be included in the calculation of the available award fee

for that period. These un-evaluated hours will receive a "satisfactory" rating (unless there is knowledge of the contrary, which would require an evaluation per statement above) and will be included in the calculation of the contractor's recommended award fee. This process ensures that the contractor will not have to forego the possibility of receiving award fee for hours legitimately worked under the contract and will eliminate administrative burdens of "carrying hours" into the next performance period. Guidance on the threshold shall be distributed by the RMT to all Work Assignment Managers (WAMs).

Use of the ARCS Tracking System

The Council strongly encourages use of the ACT system to calculate award fee pools.

*** Calculation of the Performance Index Rating Score (PIRS) and Inclusion of Program Management**

The Council determined that program management will be evaluated and included in the PIRS calculation. It will be calculated as 25% of the PIRS and this will be done consistently across all ten Regions. Fee Determination Official will ensure that this method is used by each PEB in calculating the PIRS. Regions may choose to use either whole or partial points in their initial ratings calculations.

LAN Generation of Forms

In Regions where the computer systems capabilities exist, the Council decided that use of computer-generated forms is acceptable.

Contents of Packages Provided to the PEB

The Council determined that each board member should receive a package including all information regarding work assignments with high and low ratings. In addition, ratings where the WAM, the Project Officer (PO) or the contractor's self-evaluation disagree are also to be included. The PEB should always encourage WAMs to attend the PEB as observers and to provide input during discussions of their work assignments. All program management and closeout work assignment information should also be included. One complete set of evaluations for all work assignments must be made available as a reference document for the board in case issues are aired at the meeting or questions arise with regard to the material. Quality of the material is to outweigh quantity requirements.

Debriefing of Contractors

The Council determined that the Regions may continue to follow their current practices of debriefing contractors. They must occur promptly following the meeting (within approximately two weeks). However, an additional requirement determined by the Council will be that each Region's senior management (Division Director or designated Deputy) must meet at least annually with each contractor to discuss the contractor's overall performance in the Region.

Recommendations Not Adopted or Deferred by the ARCS Council

Elimination of the Second Page of the Performance Evaluation Report (PER)

The Council felt the second page of the PER should be retained. The PEB and the Fee Determination Official (FDO) gain valuable information from the ratings included in the key areas (e.g., schedule, cost control, etc.).

Delegation of Fee Determination Official Authority

The Council felt that the impact of the recommendations of the Agency's Standing Committee on Contracts Management could not yet be evaluated. After the issuance of the committee's report, the Council will decide upon delegation of FDO authority to the Region's Senior Procurement Official on a case-by-case basis.

Contents of the Fee Determination Package Provided to the Contractor

The Council determined that each contractor should be informed of the PEB's findings in a consistent manner. Therefore, each package (sample is attached) should contain the following:

- FDO letter
- Modification to the contract
- PEB report
- Regional evaluation summary

Implementation

Changes to the award fee process will be implemented immediately. Those changes that impact the contractor (identified by an *), will be effective as of the next evaluation period, contractors need to be informed accordingly.

Attachment

Addressees:

Directors, Waste Management Divisions
Regions I, IV, V, and VII
Director, Emergency and Remedial Response Division
Region II
Directors, Hazardous Waste Management Divisions
Regions III, VI, VII and IX
Director Hazardous Waste Division
Region X
Assistant Regional Administrator,
Regions I-X

cc: Directors, Environmental Services Divisions
Regions I-X
Rich Guimond
Bruce Diamond
Sylvia Lowrance
Henry Longest
OERR Division Directors
OWPE/CED Division Director
Regional Waste Management Branch Chiefs
Regional Removal Managers
Bill Topping, PCMD
Carolyn Anderson, PCMD
ARCS Contracting Officers
ARCS Project Officers



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 25 1992

REPLY TO THE ATTENTION OF

MOC-10J

Subject: Determination of Award Fee For Evaluation
Period Nine

Dear Mr. Gau:

As the Fee Determination Official for the contract cited above, it is my responsibility to determine the amount of award fee to be awarded to your company under this contract.

Performance Evaluation Period Nine was from May 1, 1991 through October 31, 1991. The award fee pools for this period are as follows:

Program Management	\$
Remedial Planning	
Phase I Prime & Sub IOE	
Phase I Subpool	_____
Total Available	\$

I am awarding you a total of \$ _____ as the amount commensurate with the quality of your company's performance during this period. As detailed below, this represents _____ % of the total award fee pool available for the period. This is based on the Performance Evaluation Reports submitted to the Board Coordinator and upon the recommendations of the Board members.

Your performance in program management activities was rated "exceeds expectations" during this performance evaluation period; and your overall performance in remedial planning activities was rated "satisfactory." One work assignment, was given an "outstanding" rating and fourteen work assignments received a rating of "exceeds expectations."

Specific comments regarding individual work assignments can be found in the attached "ARCS Region V Evaluation Summary."

There were no work assignments (WA) completed during this evaluation period and therefore no phase II award fee earned.

In my last Award Fee Determination letter I discussed how . . . had effectively addressed problems noted in the previous period. program management performance continues to improve. I am pleased to see that program management costs have decreased \$ (excluding equipment) from the last evaluation period. The steps taken by . . . to reorganize its Program Management Office indicates to me that . . . is taking positive measures to lower program management cost. It was also noted that . . . initiated negotiations with three of its four team subcontractors to change the subcontracts from cost-plus-award fee to cost-plus-fixed fee contracts in an effort to reduce administration hours.

. . . has continued to improve its coordination with the CLP program which had been a problem in the past. Invoices and progress reports are submitted in a timely manner. The quality, accuracy and format of the information provided in these documents has continued to be improved. The number of sites which received higher than satisfactory performance ratings, during this evaluation period, indicates not only good technical abilities but better overall program management.

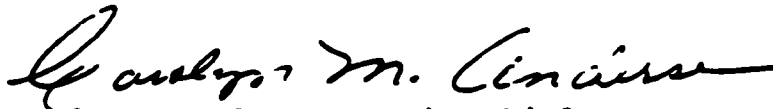
. . . has been given an "exceeds expectations" rating in program management and must now work to not only maintain that rating through the present period, but improve on that rating. . . . must scrutinize all aspects of program management to find more cost efficient methods of performance. . . . should continue to monitor work with the CLP program to insure accurate paperwork and good coordination. Also, you must aggressively seek out Small Disadvantaged Business in order to meet the SDB goals established in your contract.

The details of the total earned award fee are as follows:

Program Management	\$	(.8)
Remedial Planning		
Phase I LOE	\$	(.8)
(WA 12)		(.8)
Phase I Subpool		(.8)
(WA 12)		(.8)
Total Award Earned	\$	

Enclosed with this letter is a modification to Contract _____ which authorizes you to submit a voucher for payment of award fee earned. A final invoice reflecting the "Earned Award Fee" amount must be submitted for each work assignment completed during this evaluation period as presented above. Also enclosed is the Performance Evaluation Board Report which provides further comments on the Board's evaluation.

Sincerely yours,

A handwritten signature in cursive script, reading "Carolyn M. Anderson".

Carolyn M. Anderson, Acting Chief
Regional Contract Management Branch
Procurement and Contracts Management Division

Enclosures

1 AMENDMENT/MODIFICATION NO Seventy-six (76)		3 EFFECTIVE DATE See Blk 16C		4 REGISTRATION/PURCHASE REG. NO		5 PROJECT NO. (If applicable)	
6 ISSUED BY U.S. Environmental Protection Agency Contracts Section (MOC-10J) 77 West Jackson Street Chicago, Illinois 60604		CODE		7 ADMINISTERED BY (If other than Item 6)		CODE	
8 NAME AND ADDRESS OF CONTRACTOR (No. street, county State and ZIP Code)				9A AMENDMENT OF SOLICITATION NO			
				9B DATED (SEE ITEM 11)			
				10A MODIFICATION OF CONTRACT/ORDER NO			
				10B DATED (SEE ITEM 13) May 28, 1988			
CODE		FACILITY CODE					
11 THIS ITEM ONLY APPLIES TO AMENDMENTS OF SOLICITATIONS							
<input type="checkbox"/> The above numbered solicitation is amended as set forth in Item 14. The hour and date specified for receipt of Offers <input type="checkbox"/> is extended, <input type="checkbox"/> is not extended.							
Offers must acknowledge receipt of this amendment prior to the hour and date specified in the solicitation or as amended by one of the following methods: (a) By completing Items 8 and 15, and returning _____ copies of the amendment (b) By acknowledging receipt of this amendment on each copy of the submitted, or (c) By separate letter or telegram which includes a reference to the solicitation and amendment numbers. FAILURE OF YOUR ACKNOWLEDGMENT TO BE RECEIVED AT THE PLACE DESIGNATED FOR THE RECEIPT OF OFFERS PRIOR TO THE HOUR AND DATE SPECIFIED MAY RESULT IN REJECTION OF YOUR OFFER. If by virtue of this amendment you desire to change an offer already submitted, such change may be made by telegram letter provided each telegram or letter makes reference to the solicitation and this amendment and is received prior to the opening hour and date specified.							
12. ACCOUNTING AND APPROPRIATION DATA (If required)							
N/A							
13 THIS ITEM APPLIES ONLY TO MODIFICATIONS OF CONTRACTS/ORDERS. IT MODIFIES THE CONTRACT/ORDER NO. AS DESCRIBED IN ITEM 14							
(Y) A THIS CHANGE ORDER IS ISSUED PURSUANT TO (Specify authority) THE CHANGES SET FORTH IN ITEM 14 ARE MADE IN THE CONTRACT ORDER NO. IN ITEM 10A							
B THE ABOVE NUMBERED CONTRACT/ORDER IS MODIFIED TO REFLECT THE ADMINISTRATIVE CHANGES (such as changes in paying off, appropriation date, etc.) SET FORTH IN ITEM 14, PURSUANT TO THE AUTHORITY OF FAR 43.103(b)							
C THIS SUPPLEMENTAL AGREEMENT IS ENTERED INTO PURSUANT TO AUTHORITY OF							
D OTHER (Specify type of modification and authority) X Unilateral, pursuant to Clause B.3, Award Fee (EPAAR 1552.216-70) (Apr. 1984)							
E. IMPORTANT Contractor <input checked="" type="checkbox"/> is not, <input type="checkbox"/> is required to sign this document and return _____ copies to the issuing office							
14. DESCRIPTION OF AMENDMENT/MODIFICATION (Organized by UCF section headings, including solicitation/contract subject matter where feasible) The purpose of this modification is to authorize the Contractor to submit invoices for the following award fee amounts:							
1. During Performance Evaluation Period No. Nine, May 1, 1990 through October 31, 1991, the Contractor earned award fees as follows:							
Program Management Remedial Planning Phase I LOE Phase I Sub Pool				\$ _____ \$ _____			
Except as provided herein, all terms and conditions of the document referenced in Item 9A or 10A, as heretofore changed, remains unchanged and in full force and effect.							
A NAME AND TITLE OF SIGNER (Type or Print)				16A NAME AND TITLE OF CONTRACTING OFFICER (Type or Print)			
				Brigitte Manzke Contracting Officer			
15B CONTRACTOR/OFFEROR		15C DATE SIGNED		15D UNITED STATES OF AMERICA		15E DATE SIGNED	
_____ (Signature of person authorized to sign)				BY <u>Brigitte Manzke</u> (Signature of Contracting Officer)		FEB 1988	

Modification No. Seventy-six (76)
to Contract No.
Page 2 of 5 pages

2. The text of Contract Clause B.6, ESTIMATED COSTS AND FEES,
is revised to read:

"a) Program Management

	ESTIMATED COSTS AND FEES THRU MOD 75	CHANGE IN ESTIMATED COSTS AND FEES BY THIS MOD	TOTAL ESTIMATED COSTS AND FEES
Estimated Cost	\$3,341,184.00	\$ 0.00	\$3,341,184.00
Base Fee			
Maximum Award Fee Pool Still Available			
Cumulative amount of Award Fee awarded through 10/31/91			
Total Program	<u>\$3,522,919.65</u>	<u>(\$)</u>	<u>\$3,514,935.41</u>
Management amount (Estimated Cost + Base Fee + Award Fee Available + Award Fee Awarded)			

Modification No. Seventy-six (76)
 to Contract No.
 Page 3 of 5 pages

b) Remedial Planning

	ESTIMATED COSTS AND FEES THRU MOO 75	CHANGE IN ESTIMATED COSTS AND FEES BY THIS MOO	TOTAL ESTIMATED COSTS AND FEES
Estimated Cost	\$14,241,719.00	\$ 0.00	\$14,241,719.00
Base Fee			
Maximum Award Fee Pool Still Available			
Cumulative amount of Award Fee awarded through 10/31/91			
Prime Contractor's fixed rate laboratory support ceiling			
Total Remedial Planning amount (Estimated Cost + Base Fee + Award Fee Available + Award Fee Awarded + fixed rate laboratory support ceiling)	\$17,978,360.74	(\$)	\$17,977,002.65

Modification No. Seventy-six (76)
to Contract No.
Page 4 of 5 pages

c) Subcontracting Pool

	ESTIMATED COSTS AND FEES THRU MOO 75	CHANGE IN ESTIMATED COSTS AND FEES BY THIS MOO	TOTAL ESTIMATED COSTS AND FEES
Estimated Cost	\$142,857,143.00	\$ 0.00	\$142,857,143.00
Base Fee			
Maximum Award Fee Pool Still Available			
Cumulative amount of Award Fee awarded through 10/31/91			
Total Subcontract- ing Pool amount (Estimated Cost + Base Fee + Award Fee Available + Award Fee Awarded)	<u>\$149,999,088.44</u>	(<u> </u>)	<u>\$149,999,061.44</u>

modification No. Seventy-six (76)
to Contract No.
Page 5 of 5 pages

d) Total contract

	ESTIMATED COSTS AND FEES THRU MOO 75	CHANGE IN ESTIMATED COSTS AND FEES BY THIS MOO	TOTAL ESTIMATED COSTS AND FEES
Estimated Cost	\$160,440,046.00	\$ 0.00	\$160,440,046.00

Base Fee

Maximum Award
Fee Pool Still Available

Cumulative amount
of Award Fee awarded
through 10/31/91

Prime Contractor's
Fixed rate laboratory
support ceiling

Total Estimated Contract amount (Estimated Cost + Base Fee + Award Fee Available + Award Fee Awarded + fixed rate laboratory support ceiling)	\$171,500,368.83	\$ ()	\$171,490,999.50
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e) This contract will be modified to reflect the award fee as award fee determinations are made. There shall be NO base or award fee applied to the prime contractor's fixed rate laboratory support. There shall be NO award fee applied to the prime contractor's mobile laboratory acquisition costs.

f) The Subcontracting Pool, although listed separately within this clause for purposes of clarity, is a subelement of the Remedial Planning portion of the contract."

**PERFORMANCE EVALUATION BOARD
CONTRACT NUMBER**

**EVALUATION REPORT NUMBER 9
May 1, 1991 through October 31, 1991**

Performance Evaluation Board (PEB) Members:

Gail Ginsberg for David Ullrich, Chairperson
Norm Niedergang
Rick Karl
Pat Bamford for Elissa Speizman

Other Participants:

Brigitte Manzke	Martin Sandoval	Tom Short
Jodi Traub	Tom Mateer	Cynthia Wakat
Carl Norman	Patricia Vogtman	Stephen Nathan
Ray Johnson	Peggy Hendrixson	

INTRODUCTION

On December 4, 1991, Region's V's Performance Evaluation Board (PEB) met to determine the performance ratings for the ninth rating period of the ARCS Inc. Contract. The Project Officer (PO) presented the recommended ratings for program management as well as individual technical performance. This report represents the deliberations and findings of the PEB.

PROGRAM MANAGEMENT

Current Work Load

Activities this semester included providing program management to 41 technical work assignments on this contract. Seven new work assignments were awarded during the semester. Kickoff meetings\conference calls were held on all of the new work assignments. EPA believes this practice is mutually beneficial to both parties.

Change of Project Personnel\Reorganization

Effective June, 1991, Program Management Office (PMO) was reorganized. Two positions were eliminated - the cost and scheduling engineer position and the Sheboygan Operations Manager position. The Chicago Operations Manager, Mr. Tom Dalton, assumed the cost and schedule responsibilities. Mr. Roman Gau, ARCS Project Manager, and Mr. Brian Klatt assumed the responsibilities of the Sheboygan Operations Manager as part of their current job duties. In addition to the elimination of two positions, work was redistributed to shift some of the administrative duties to lower personnel classifications. This reorganization appears to have lowered program management costs for the evaluation period. See

discussion of Program Management Costs.

In September, _____ was purchased by Wheelabrator Technologies, Inc. (WTI). WTI is a publicly held corporation where 57% of its stock is owned by Waste Management, Inc.. Waste Management has been a client of _____ for a number of years, and our Agency has not assigned any work to _____ where EPA believed there might be a Conflict of Interest (COI). There could be a potential COI should any of the PRPs on existing work assignments hire Waste Management, INC. for Superfund activities. Wheelabrator Technologies is not the PRP on any of the work assignments assigned to Donohue.

Program Management Costs

Through the end of October, 1991, the contractor expended \$ _____ under program management. The average program management cost, excluding equipment, from May 1, 1991 through October 31, 1991 decreased \$ _____ from the previous semester - from \$ _____ to \$ _____. The number of program management LOE decreased \$ _____ - from _____ LOE hours to _____. LOE hours. The number of Remedial LOE decreased \$ _____ - from _____ to _____.

_____ contract with each of its four Team Subcontractors provides for cost-plus-award-fee (CPAF). _____ found that administering the CPAF required a considerable amount of Program Management LOE in developing award fee evaluations, funding letters, and processing follow-up invoicing by Team Subcontractors and requested approval to change the CPAF to cost-plus-fixed-fee (CPFF) Contract for three of its Team Subcontracts in an effort to reduce PM LOE. EPA consented to this request on November 1, 1991.

Limitation of Funds

The contractor continues to notify U.S. EPA when it expects to reach 75% of the funding expenditure limit in compliance with Section B.7 of their contract. The contractor and EPA have worked together to successfully ensure that _____ did not exceed hours and dollars authorized in any of the work assignments.

Summary Subcontract Report

The contract requires that EPA review and consent to all cost reimbursement, time & materials, and fixed price pool subcontracts over \$25,000. In accordance with this requirement, _____ requested consent for Modifications 1 & 2 with its pool subcontractor, Environmental Engineering & Remediation, Inc. regarding the South Andover Site. EPA approved these requests.

Through the end of October, _____ awarded \$728,557 to pool subcontractors of which \$382,988 was awarded to Small Business Enterprises (SBE) and \$52,317 was awarded to Small Disadvantaged Business Enterprises (SDBE). Through the end of this evaluation

period, the contractor's utilization was as follows:

	<u>SB</u>	<u>SDB</u>
Goals	%	%
Actual	%	%

These percentages have exceeded the ratings for the previous semester - % for SBE and % for SDBE. has significantly exceeded its SBE goal and has made a notable effort to meet its SDBE goal.

Quality Assurance/CLP Lab Coordination

Approximately 250 samples were processed from the Torch Lake site and another 900 were processed from the Himco Dump Site. During this evaluation period, a new sampling coordinator was brought on board. There were some communication problems initially; however, these were quickly resolved. Any errors were readily corrected and documented in the file. has become proactive in scheduling samples and notifying EPA of any potential complications.

Monthly Progress Reports/Invoices

Monthly progress reports and invoices continue to be submitted in a timely manner and are of high quality. The monthly progress reports are, for the most part, very well written and accurate. They address discrepancies between activities which occur in a given month but are invoiced in another. The schedules are clearly laid out. The invoices provide very detailed information and very few errors were noted. The number of LOE and dollars invoiced is consistent with the hours and costs identified in the monthly progress reports.

Past Areas of Concern

In our previous evaluation, no areas of concern were specifically identified. Although none have been specifically identified for this rating period, EPA always welcomes continued efforts to reduce program management costs. Again, the Agency is pleased to see these costs have been reduced, and encourages to seek ways to further reduce costs.

SUMMARY

The overall program management rating for this evaluation period is "exceeds expectations." The contractor has demonstrated it has the motivation and organizational skills to make positive changes in an effort to provide better contract management. The contractor remains responsive to EPA needs; has submitted original and revised work plans that are, for the most part, clearly written with detailed cost analysis; has successfully complied with contract requirements, such as, reporting and notification requirements; and has improved its coordination with CLP. The overall technical

performance of the work assignments has improved since previous rating period which may be partially attributed to better program management. Based on the performance for this period, Region V recommends that of the available award fee be awarded for program management this semester. This estimated dollar amounts of the available and recommended award fees for this period are given below. This estimate will be confirmed by the CO prior to award.

Available

\$

Recommended

\$

OVERALL TECHNICAL PERFORMANCE

Evaluation of the overall technical performance for this period includes 41 active work assignments listed on the attached Regional Evaluation Summary (RES). Five work assignments have been closed to date. Of the 41 work assignments, has the lead on five fund-lead RI/FS work assignments; nine RI/FS oversight work assignments; ten RD oversights; fourteen separate work assignments for Community Relations; one work assignment for Design Investigation; one work assignment for RD negotiation support; and one work assignment for Risk Assessment.

For this semester, the ratings for the 41 work assignments are as follows:

Outstanding	1
Exceeds Expectations	14
Satisfactory	25
Marginally Satisfactory	1

Of the 25 work assignments that received a satisfactory rating, 16 had less than 50 hours expended during the evaluation period. The number of work assignments that received a higher than satisfactory rating increased from eleven to fifteen. The table below identifies those work assignments by site name and type which received a higher-than-satisfactory rating:

Torch Lake	WA# 2	RI/FS
Allied Chemical	WA# 8	RD O
Hi-Mill Manufacturing	WA# 11	RI/FS O
Himco Dump	WA# 17	RI/FS
South Andover	WA# 20	RI/FS
Ormet	WA# 23	EA
Alsco Anaconda	WA# 24	RD O
Torch Lake	WA# 25	CR
Berlin & Farro	WA# 26	CR
Cross Brothers	WA# 31	RD O
Auto Ion	WA# 32	RI/FS O
Columbus Old City LP	WA# 33	RD O
South Andover	WA# 39	CR
Allied Chemical	WA# 42	RD/RA O

Please see the attached ARCS Region V Evaluation Summary for specific comments regarding each work assignment.

Based on the performance for this semester, Region V recommends that 100% of the available award fee be awarded for overall technical performance with the exception of Mound Plant. Region V recommends that of the award fee be available for Mound Plant.

The available Phase I award fee was identified on the attached Phase I Award Fee Allocation Matrix submitted by for all work assignments for the ninth rating period.

	<u>Available</u> <u>Phase I Award Fee</u>	<u>Percent</u> <u>Awarded</u>	<u>Recommended</u> <u>Phase I Award Fee</u>
Mound Plant	\$	%	\$
All Other WAs	\$	100%	\$

The Contracting Officer will verify the available amount of Phase I fee prior to award.

Special Subcontracting Pool

All work assignments, except Mound Plant, utilizing special subcontracting pools were rated as satisfactory or higher. Therefore, the PEB awards % of the available award fee associated for Mound Plant and 100% for all others work assignments with the special subcontracting pool.

	<u>Available</u> <u>Phase I Award Fee</u>	<u>Percent</u> <u>Awarded</u>	<u>Recommended</u> <u>Phase I Award Fee</u>
Mound Plant	\$49.10	%	\$22.10
All others	\$1,819.67	100%	\$1,819.67

These estimates will be confirmed by the Contracting Officer prior to award.

WORK ASSIGNMENT COMPLETION REPORTS (WACRS)

There were no WACRS during this evaluation period.

PERFORMANCE INDEX RATING SCORE (PIRS)

In consideration of the overall technical performance on 41 active work assignments, the PIRS is .4. The actual calculation (PIRS raw total divided by the actual LOE total) is shown on the following page.

ARCS REGION V EVALUATION SUMMARY

CONTRACTOR:	CONTRACT NO.:	PERFORMANCE EVALUATION PERIOD
PA PROJECT OFFICER: Patricia Vogtman		FROM: May 1, 1991
CONTRACTOR PROGRAM MANAGER: Roman Gau		TO: October 31, 1991
PERFORMANCE EVALUATION KEY:		

SITE NAME	WORK ASSIGNMENT NUMBER	NUMERIC RATING	COMMENTS
ain Street, IN	01-5LD3 FS	4	The ROD was signed in March, 1991 and the contractor has been available for negotiation support. However, minimal assistance has been needed. A Unilateral Order is expected to be issued within a couple of months and the work assignment will be closed out at that time. The overall performance was satisfactory.
orch Lake, II	02-5LS8 RI/FS	4	The semester has been very active for this work assignment. The contractor submitted the final draft Baseline Risk Assessment (RA) for OU I & 2, and the RI Reports for OU II and OU III, conducted field sampling for sediment and surface water samples along the Keweenaw Waterway, and initiated the OU I and OU III Feasibility Study (FS). The contractor demonstrated excellent ability to provide personnel with technical expertise in all areas (especially in field work planning and implementation); sound project planning and management skills; shown through prompt submittal of RI and RA reports and their ability to conduct excellent field work. The level of technical quality of field work and documents has enabled the WAM to manager the project more effectively and make well-informed decisions. The contractor has been flexible and responsive to the needs of the project and requests of the WAM. There is a high level of effort as demonstrated by the quality of the work products. The overall performance exceeded expectations.

SITE NAME	WORK ASSIGNMENT NUMBER	NUMERIC RATING	COMMENTS
Rockwell Inter. MI	03-5L1B (RI/FS O)	‡	Minimal activity at this site during the semester. The contractor updated the site information repository and performed routine administrative tasks. Work was timely and conducted in a manner which conserved work assignment funds. Site manager maintained good contact with the RPM. Overall performance was satisfactory.
Adams Plating MI	04-5LDJ (RI/FS)	N/A	WACR
Willow Run, MI	05-5L61 (RI/FS O)	‡	Minimal activity at this site during the evaluation period. The contractor attended a meeting with EPA and the PRP to discuss the PRP's RA. The contractor has maintained good contact with EPA, and has also been able to arrange for staff members to attend PRP meetings with EPA on very short notice. Overall performance was satisfactory.
Union Carbide OH	06-5PF4 (FS O)	N/A	WACR
Schmalz Dump, WI	07-5NJ3 (CR)	N/A	WACR
Allied Chem. OH	08-5PE4 (RD O)	‡	The contractor conducted field oversight, including installation of test borings and geophysical testing. also prepared technical comments regarding groundwater, capping pre-design, and barrier wall pre-design. The quality of technical work has been strong. All work has been performed on schedule, often with little or no advance warning. The PRP at this site has commented to EPA about the high quality and strong experience of the field oversight staff. The field oversight staff has provided constructive comments and input while out in the field. The overall performance exceeded expectations.
Arcanum Iron, OH	09-5N96 (CR)	‡	The contractor incorporated comments from the CRC, RPM and the Ohio EPA on the revised Community Relations Plan and submitted it to the Repository. The contractor has kept in

SITE NAME	WORK ASSIGNMENT NUMBER	NUMERIC RATING	COMMENTS
			touch with the CRC and the RPM to ensure the project was on track. All functions have been managed effectively to minimize time. The WAM felt could have provided more direction to the site manager in preparing the CRP. The overall performance was satisfactory.
Hi-Mill MI	10-5P9Q (CR)	3	Minimal activity other than periodic communication with the CRC and RPM to check on project status. Also mailed an updated NPL to the Repository. Performance has been satisfactory.
Hi-Mill, MI	11-5P9Q (RI/FS O)	3	The contractor reviewed and provided comment on the PRP's work plan, sampling plan, Quality Assurance Project Plan (QAPP), Ecological Inventory Assessment Work Plan and mini-QAPP for taking split samples. The review of documents was done thoroughly and all deliverables were provided on or ahead of schedule. The contractor was always available, even on short notice, to respond to questions or provide review. Efforts were made by the contractor to cut costs whenever possible. The overall performance exceeded expectations.
Mound Plant, OH	12-5PFA (RI/FS O)	3	The contractor reviewed and provided comments on several technical memos related to the Baseline RA, FS, work plans for operable units and scoping documents. The contractor attended meetings with the WAM and continued field preparation activities. This work assignment was rated "satisfactory" in project planning, technical competence and effort and a "marginal" rating in the remaining categories - schedule & cost control, reporting and resource utilization. On the positive side, the contractor was responsive to changes in the scope of work related to field work and health and safety issues. Comments provided on risk assessment were thorough and useful. Some of the comments regarding tech memos and scoping documents were satisfactory; others were only marginally so. Review comments were submitted on time. On the negative side, errors were noted in the monthly progress reports. Another concern was the "unreasonable" number of hours being charged to project management.

SITE NAME	WORK ASSIGNMENT NUMBER	NUMERIC RATING	COMMENTS
			Management hours charged to the project did not decrease with decreasing work load. EPA met with the contractor on October 3, 1991 to discuss the WAM's concerns. In an effort to remedy the problem, reassigned a new site manager the following week and agreed in their response to EPA's Performance Event Report to address EPA's concerns. The overall rating was marginally satisfactory.
South Andover, MN	13-5N45 Design. Investigation	3	During this semester, the contractor completed the hydrogeochemical evaluation of the groundwater medium, compiled technical memoranda and submitted the draft Design Investigation. Since this report is still under review, EPA is unable to evaluate its quality. The overall performance was satisfactory.
Peerless Pl, MI	14-5LG2 (RI/FS)	3	The contractor prepared and submitted the draft and final RI; draft and final Baseline RA and the Alternatives Array Document (AAD). also initiated the FS. The contractor submitted a work plan revision to include soils as well as groundwater in the RI and FS. The Contract Pricing Proposal to reflect the additional media seemed on the high side and originally included the use of high level personnel performing data entry. This was questioned and later changed, but it should not have been there in the first place. The quality of the deliverables is satisfactory. The contractor has been in constant contact with the WAM to discuss issues that come up with regard to potential remedies, ARARs, cleanup standards. Overall EPA is pleased with the technical quality of this work assignment, but does not believe that the contractor is doing all that could be done to minimize costs, e.g., use of higher level personnel than really required, holding meetings when conference calls could do. The overall performance was satisfactory.

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erless Pl,	15-5LG2 (CR)	4	Very little activity. Performance was satisfactory.
mco Dump, I	16-5L4J (CR)	4	Very little activity. The contractor sent Indiana NPL updates to both information repositories and sent a letter of justification and work plan revision for additional LOE and funding in order to complete the Community Relation Activities identified in the original work plan. The overall performance was satisfactory.
imco Dump,	17-5L4J	4	During this semester, the contractor evaluated the Phase I field data, and is currently in the process of developing the RA and the RI Report. However, the RI will not be finalized until the data from the September Phase II field investigation is evaluated and incorporated into these documents. The phase II field investigation included, among others activities, surface water and sediment sampling, wetlands delineation, monitoring well installation, cap soil chemistry and geotechnical samples. The contractor has provided excellent technical direction to EPA in planning for and implementing the Phase II field investigation. was extremely responsive to requests by EPA Quality Assurance Section for revisions to the QAPjP to keep the project on a tight schedule. Communication is open and the contractor has been very responsive to requests by the WAM. The contractor has done an excellent job in coordinating efforts at this site between and local and state agencies. The overall performance exceeded expectations.
Union Carbide OH	18-5P4 (FS U)	4	The contractor performed RI/FS field oversight from May through August, 1991, reviewed and provided comments on the PRP's Ecological Field Survey, Treatability Study, and Groundwater Model Report. The site manager used staff efficiently to maintain costs especially for field oversight. Documents reviews and progress reports were always timely. However, the project needs strong management

SITE NAME	WORK ASSIGNMENT NUMBER	NUMERIC RATING	COMMENTS
			to tie in all of the different comments from the respective reviewers to ensure cohesiveness, appropriateness, and to give overall direction to the project. The overall performance was satisfactory.
Allied Chem. H	19-5PE4 (EA)	N/A	WACR
. Andover, N	20-5F45 RI/FS	‡	During this evaluation, the contractor prepared and submitted the draft and final copies of the RI Report, baseline RA, AAD, and the FS. was able to prioritize activities so that all tasks related to the RI and FS were performed in a timely manner in spite of delays of approximately four and one half months which occurred due to the EPA's indemnification process and late receipt of CLP lab data from U.S. EPA's Quality Assurance Section. In July, the site manager left the company and the new site manager readily adapted to the project and was able to schedule the personnel with the necessary expertise and the ability to work long hours in order to complete the tasks in a very tight schedule. was extremely responsive to the Agency's needs and provided regular support and communication. was able to produce exceptional documents which needed little revision. The overall performance was outstanding.
Union Carbide OH	21-5PFU (CR)	‡	The contractor completed the site update fact sheet in May. No further activities, other than routine maintenance, took place. Overall performance was satisfactory.
Anderson Devel- opment, MI	22-5PF8 (RI/FS TA)	N/A	WACR
Ormet Corp, OH	23-5LIZ (EA)	‡	The contractor revised the RA, most notably the air modeling portion of the RA. also reviewed the draft FS to determine whether appropriate use was made of the RA in evaluating remedial alternatives and provided technical

SITE NAME	WORK ASSIGNMENT NUMBER	NUMERIC RATING	COMMENTS
			<p>assistance to the WAM during conference calls. The contractor seemed to have thought out and considered every aspect of the situation prior to revising the baseline RA. Knowledge of cleanup standards for the site was clearly demonstrated. The contractor an excellent job of incorporating EPA comments into the Baseline RA. If any comments seemed inappropriate, the contractor explained its rationale for such a determination. The contractor provided excellent technical support to WAM during meetings and conference calls. The overall performance exceeded expectations.</p>
Isco Anaconda, I	24-5P1Y (RD/RA 0)	4	<p>The contractor reviewed and commented on the PRP's Derivation of Clean-up Levels, draft QAPP, Health & Safety Plan, Field Sampling Plan, and Closure Plan. met with contractor to discuss the upcoming submittal of the RA work plan. overall performance has exceeded expectations. Comments submitted demonstrated exceptional knowledge of regulations and procedures. They were of high quality, thorough and clearly written. was responsive to WAM's requests for a quick turnaround of documents. Deliverables were submitted either early or on schedule. The overall performance exceeded expectations.</p>
orch Lake, I	25-5LS8 (CR)	4	<p>EPA held a public meeting on October 17, 1991, to discuss the status of the site to date, e.g., results of the RI for OU I and the field work for OU II & III. In preparation for the meeting, the contractor placed the announcement in the newspaper, laid out the fact sheet using desktop publishing and had it printed for the October mailing. The contractor also prepared 13 color overheads for the public meeting and updated the repository as appropriate. Although there was not a lot of work done during this evaluation period, the work that was completed was done very well. The Fact Sheet looked very professional and the overheads were of excellent quality. Both materials were very helpful in helping the public understand the issues and status of the Torch Lake Site. The deliverables were completed ahead of schedule. The overall performance exceeded expectations.</p>

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Berlin Far, MI	26-5P41 (CR)	3	The contractor prepared draft fact sheet regarding the revised Proposed Plan for the Berlin & Farro Site. After the fact sheet was edited by EPA, the contractor laid out the fact sheet, reproduced it, and sent it to everyone on the mailing list. The contractor also arranged for the services of the court reporter and placed the ad announcing the Proposed Plan. The contractor finished the tasks ahead of schedule. The graphics for the fact sheet and the public hearing were done very well. The work assignment is projected to come in under budget. The overall performance exceeded expectations.
Berlin Far, MI	27-5B41 Neg Support	3	The only activities were administrative. Overall performance was satisfactory.
Savanna Army IL	28-5PY9. (RI/FS RD/RA)	3	Very limited activities have taken place during the performance period other than the completion and approval of a revised work plan and scheduling of personnel for field oversight. Donohue is awaiting formal approval of the Army's work plans to begin field oversight activities for the facility RI/FS, Operable Unit RI/FS-RD/RA, and Operable Unit Removal. No problems were encountered technically. acted responsively once the RPM followed up on revising the oversight work plan. This work plan was revised and approved in a short time-frame. One error was noted in the monthly billing, i.e., travel costs were erroneously billed to the project. Contractor must ensure invoices contain accurate information. The overall performance was satisfactory.

SITE NAME	WORK ASSIGNMENT NUMBER	NUMERIC RATING	COMMENTS
ab Orch,	29-5PP2 (RI/FS-RD/RA O)	18	<p>The major work conducted by this reporting period consisted of RI/FS document review and field oversight of the phase 1 RI field work at the Explosives/Munitions Manufacturing Areas Operable Unit (OU III). Field activities included oversight for the excavation of 25 test pits, collection of surface water, groundwater, sediment, and soil samples and the installation of monitoring wells. strengths this period included the timeliness of the identification and resolution of a change to the field schedule which impacted the contract assumptions and budget. This was resolved in an expeditious manner. The site manager worked closely with the WAM to ensure that the costs of field oversight were controlled. primary weakness this period was the inadequacy of the person who conducted oversight tours 2 and 4 about contacting the WAM and, if he did call, did not leave a comprehensive message. The RI progress reports are of good quality and clearly outline the progress of work activities in the field, unanticipated occurrences, problem resolution and documentation of field changes. The overall performance was satisfactory.</p>
uto Ion I	30-5PC4 (RD O)	8	<p>There was very little activity during this period. The contractor did provide expertise on air modeling. This expertise was instrumental in identifying and resolving an air modeling problem that was contained in the PRP's work plan. The overall performance was satisfactory.</p>
ross Brothers L	31-5P86 (RD O)	8	<p>EPA disapproved the PRP's original RD Workplan in May. A new contractor was brought on board. By using an interactive approach between the PRP's contractor and EPA's contractor to resolve issues raised during the technical review of the new RD/RA work plan, EPA was able to approve the RD work plan. What began as a dismal six months ended with the prospect of a timely and successful PRP lead RD/RA at this site.</p>

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uto Ion I	32-5PC4 (RD O)	3	<p>The contractor reviewed the PRP's draft FS and provided comments to the Region. In addition to providing comments, the contractor prepared a suggested guidance document regarding MDNR ARARs to assist the PRPs in completing the FS. In spite of the efforts to help the PRPs submit an approvable FS, it has not happened. The PRPs, however, have hired another contractor. This site is scheduled for a second quarter ROD. If the PRPs do not submit an acceptable FS by agreed upon due dates, EPA is considering a site work take over. The FS comments submitted by the contractor were practical and identified significant omissions in the work product. The contractor was proactive/innovative in eliciting MDNR ARARs that had been problematic in obtaining. During this period, the site was reassigned to another manager. The new site manager assumed his new duties without problem and little, if any, down time was noted. In all meetings, the site manager has been very professional and has exhibited a wealth of experience and knowledge. The overall performance exceeded expectations.</p>
Old City LF IN	33-5PK2 (RD O)	3	<p>Contractor reviewed and submitted comments on "Data Evaluation and Action Levels for Landfill Loading Activities" and the "Draft Technical Supplement to the Feasibility Study." The contractor has done a very good job in producing quality deliverables well within the prescribed budget. A maximum amount of work has been realized with using a reasonable amount of LOE. The contractor has exhibited a fairly high degree of responsiveness in submitting deliverables within tight time frames. Contractor has also maintained regular contact with WAM in planning and anticipating upcoming work. The overall performance exceeded expectations.</p>

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Kysor Industrial [34-5P2W (RD)	4	Reviewed and provided comments on PRP's Remedial Design Additional Studies Report and on the MDNR's comments on this report. The site manager made a 2-day visit to the site to observe pilot testing activities. Comments submitted by the contractor were clear, concise and technically competent. On the few occasions when the WAM requested information from the contractor, the information was gathered promptly and submitted to the WAM. The overall performance was satisfactory.
Northernnaire Planting, MI	35-5P83 (RD O)	4	Same comment as above. Contractor is currently using a 60/40 ratio for invoicing costs on Northernnaire Industrial and Kysor Industrial.
Novaco I	36-5ND8 (CR)	4	The contractor wrote the draft fact sheet. After the draft, was edited by EPA, the contractor created graphics for the fact sheet and overheads, laid out the fact sheet, reproduced it, and sent it to everyone on the mailing list. The contractor also arranged for the court reporter, placed ads announcing the proposed amendment to the ROD and the signing of the amended ROD. This work assignment was successfully completed on a very tight schedule because the contractor was well organized and had the expertise to accomplish the tasks as directed by the WAM. The contractor was very responsive in meeting the WAM's requests. The contractor displayed flexibility in meeting changing deadlines and last minute changes in plans. The overall performance was satisfactory.
Cross Brothers IL	37-5P41 (CR)	4	Very little activity. Only maintenance items such as updating the mailing list and repository were done. Performance was satisfactory.
United Scrap Lead OH	38-5NH5 (CR)	4	The contractor incorporated comments from the RPM, CRC, and the OEPA regarding the CRP, finalized the document and sent it to the repository. All functions have been effectively managed to minimize time. The contractor kept in touch with the CRC and the RPM to make sure the project was on track. The final CRP was well written and accurately reflected comments submitted by the EPA and the OEPA. The overall performance is satisfactory.

SITE NAME	WORK ASSIGNMENT NUMBER	NUMERIC RATING	COMMENTS
			The final CRP was well written and accurately reflected comments submitted by EPA and the OEPA. The overall performance is satisfactory.
South Andover IN	39-5F45 (CR)	1	The contractor produced two fact sheets - an 8-page RI and a 12-page Proposed Plan, made the arrangements for the public meeting placed ads in the newspaper, secured the services of the court reporter, updated the mailing list, and the repository. This project was on a "fast track" in order to meet a first quarter ROD. In part, through excellent organizational skills, the contractor was able to successfully complete the tasks assigned on time or ahead of schedule. The overall performance was exceeds expectations.
Auto Ion MI	40-5PC4 (CR)	1	The contractor submitted a work plan for OU I Community Relations. The work plan was submitted by the agreed to due date and was approved with no revisions. Overall performance was satisfactory.
Auto Ion MI	41-5PC4 (CR)	1	The contractor submitted a work plan for OU II Community Relations. The work plan was submitted by the agreed to due date and was approved with no revisions. Overall performance was satisfactory.
Allied Chemical OH	42-5PE4 (CR)	1	This is a new work assignment. The development of the work plan was on a tight schedule in order to facilitate the review of the PRP's RD/RA Work plan. EPA received a preliminary work plan within 20 days of acceptance of the work assignment and a final within 30 days. The assumptions in the work plan were well documented. Contractor's LOE estimate was within 7% of EPA's IGE. The site manager has been very enthusiastic about this project and worked very quickly to produce an approvable work plan. The overall performance exceeded expectations.
Union Carbide OH	43-5PF4 (RI/FS O)	1	New work assignment. Submittal of the work plan was delayed until 30 days after receipt of PRP's work plan. The overall performance was satisfactory.

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iegelberg	44-5PA6 (RD O)	4	New work assignment. Held kickoff meeting. Overall performance was satisfactory.
ntwood LF	45-5PF1 (RD O)	4	New work assignment. Held kickoff meeting. Submitted draft work plan to EPA. Overall performance is satisfactory.
lied Chemical	46-5PE4 (CR)	4	New work assignment. Held kickoff meeting. Overall performance was satisfactory.

Pat Veatman
Project Officer Signature

11/15/91
Date