

Appendix H

Corresponding Obligations of the License and Settlement Agreement

The following off-site areas identified in the License as subject to corrective action correspond to the following areas addressed by the Settlement Agreement:

License	Settlement Agreement
<i>Scope of Settlement Agreement and License</i>	
Tittabawassee River (TR) Sediments Tittabawassee River Floodplain Saginaw River (SR) Sediments Saginaw River Floodplain Saginaw Bay (SB) (XI.B.2; XI.B.6)	Administrative Settlement Agreement and Order on Consent (AOC) paragraph 12.aa (Definition of "Site")

The following activities required by the License correspond to activities to be conducted under the Settlement Agreement as it pertains to the portion of the Site that is addressed:

License	Settlement Agreement
<i>Source Control</i>	
Identify and propose exposure and source control activities (XI.R1 and 2)	<ul style="list-style-type: none"> • Statement of Work (SOW) Task 1 (Potential Acute or Near-Term Exposure Risks) • SOW Task 2 (Potential Acute or Near-Term Contaminant Transport Risks) • SOW Task 8 (Segment Specific Response Evaluations and Proposals) • SOW Task 10 (Segment-Specific Post-Response Residual Risk Demonstration) • SOW Task 13 (Operable Unit (OU) 2 Site Characterization) • SOW Task 16 (Detailed Analysis of Alternatives)

License	Settlement Agreement
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Remedial Investigation

Develop and submit License Scope of Work for TR and Floodplain (XI.B.3) Approved by MDEQ on [date].	Continuing Interim Response Activity (IRA) obligations to be addressed pursuant to SOW – Section II and Exhibit A
Submit Remedial Investigation (RI) Work Plans for Tittabawassee River and Floodplain (XI.B.5)	<p>The SOW requires RI work plans and activities under the following sections:</p> <ul style="list-style-type: none"> • SOW Task 4 (Site-Wide Monitoring) • SOW Task 5 (Treatability or Pilot Studies) • SOW Task 7 (Define OU 1 Segments and Conduct Baseline Work) • SOW Task 8 (Segment-Specific Response Evaluations and Proposals)
Implement RI for TR and Floodplain (XI. B.5)	<ul style="list-style-type: none"> • As needed, under SOW Task 8.1.3
Submit Final RI Report for TR and Floodplain (XI.B.5)	<ul style="list-style-type: none"> • SOW Task 8 (Segment-Specific Response Evaluations and Proposals)
Develop and submit License Scope of Work for SR/SB and Floodplain (XI.B.8)	SOW OU 2 Tasks
Submit written RI Work Plan SR/SB and Floodplain (XI.B.8)	<p>The SOW requires RI work plans and activities under the following sections:</p> <ul style="list-style-type: none"> • SOW Task 11 (Present and Evaluate Existing Data) • SOW Task 12 (Project Scoping and Remedial Investigation/Feasibility Study (RI/FS Planning Documents)
Implement RI for SR/SB and Floodplain (XI.B.8)	<p>The SOW requires implementation of RI work plans and activities</p> <ul style="list-style-type: none"> • Task 13 (Site Characterization).
Submit Final RI Report for SR/SB and Floodplain (XI.B.8)	<ul style="list-style-type: none"> • SOW Task 14 (RI Report)

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<i>Risk Assessment</i>	
Perform Ecological and Human Risk Assessment XI.B.3(iv) – (v), XI.B.5, and XI.B.8	<ul style="list-style-type: none"> • SOW Task 10 (Segment Specific Post-Response Residual Risk Demonstration) • SOW Task 13.4 (Risk Assessment)

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<i>Feasibility Study</i>	
Submit FS work plan (XI.I.1)	<ul style="list-style-type: none"> • SOW Task 5 (Treatability or Pilot Studies) • SOW Task 8 (Segment-Specific Response Evaluations and Proposals) • SOW Task 12.2 (RI/FS Work Plan)
Implement FS work plan (XI.I.2-3)	<ul style="list-style-type: none"> • SOW Task 5 (Treatability or Pilot Studies) • SOW Task 8 (Segment-Specific Response Evaluations and Proposals) • SOW Task 15 (Development and Screening of Alternatives)
Submit written FS Report after completing FS (XI.I.4)	<ul style="list-style-type: none"> • SOW Task 8 (Response Proposal) • SOW Task 16 (Detailed Analysis) • SOW Section VIII F (FS Report)

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<i>Response Design</i>	
Remedial design aspects of a Remedial Action Plan (XI.J.1)	Contingent upon DEQ concurrence in Record of Decision: <ul style="list-style-type: none"> • SOW Task 9 (Segment-Specific RD) • SOW Task 17 (Operable Unit 2 RD)

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<i>Interim Response Activities (IRAs)</i>	
Submit written IRA work plan (XI.B.5, XI.B.9 and XI.G.1)	<ul style="list-style-type: none"> • AOC paragraph 30 (Response Design) • SOW Task 1 (Potential Acute or Near-Term Exposure Risks) • SOW Task 2 (Potential Acute or Near-Term Contaminant Transport Risks) • SOW Task 8.2 (Determine Need for Early Response Action) • AOC paragraph 29(c) (Early Response Actions under CERCLA)

License	Settlement Agreement
<i>Scheduling and Reporting</i>	
Deadlines for corrective action submittals (XI.O)	<ul style="list-style-type: none"> • SOW Exhibit B (Schedule for Major Deliverables) and other schedules developed under approved work plans.
Submit written progress reports (XI.O)	<ul style="list-style-type: none"> • SOW Task 6 (Progress Reports)

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<i>Public Involvement</i>	
Plan for public participation (XI.B.3(c))	<ul style="list-style-type: none"> • AOC paragraph 31 (Community Involvement Plan and Technical Assistance Plan) • SOW Task 3 (Community Involvement Support and Technical Assistance Plans)