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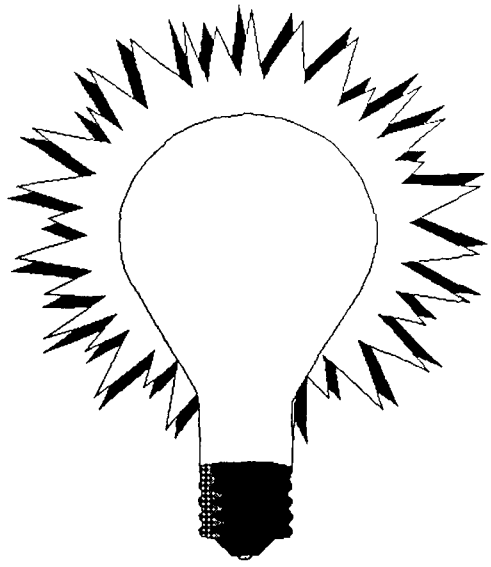
Compendium of Good Ideas



Models of Success and Lessons Learned

Volume 1
Highlights

Publication 9202.1-10-1
March 1993

SUPERFUND COMPENDIUM OF GOOD IDEAS

Models of Success and Lessons Learned

Volume 1
Highlights

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Washington, DC 20460

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MAR

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Compendium of Good Ideas

FROM: Richard J. Guimond
Assistant Surgeon General, USPHS
Acting Assistant Administrator

TO: Addressees

This memorandum transmits the Compendium of Good Ideas (Compendium), a compilation of Regional solutions to the challenges of implementing the Superfund program.

I am proud to send you the Compendium because it demonstrates the creative energy of the Superfund program. Last year, I challenged all of us to suggest ways to make Superfund more efficient, effective, and equitable. The Superfund Revitalization Office (SRO) sent teams to each Regional office gathering innovative ideas, which are presented here in two volumes: Volume 1, a showcase of Superfund ideas; and Volume 2, a reference source with descriptions of almost 250 items.

The Compendium provides the Superfund program with tools for change. Contact persons are listed for each item in the Compendium so that eye-catching items can be pursued. In addition, we are exploring methods for sharing these ideas in more detail amongst the Regions, including a national "Festival of Good Ideas," interactive video presentations, and other inter-Regional activities. We will let you know more about these follow-up efforts in the near future. To improve responsiveness to your needs, I ask you to consider which ideas your Region would like most to hear about.

Despite the impressive magnitude of ideas in the Compendium, I believe that there are far more ideas still waiting to be discovered. If you have a good one, please send it to me so that we can all benefit from each others' ideas.

Attachments

Addressees:

Deputy Regional Administrators
Assistant Regional Administrators
Waste Management Division Directors
Environmental Services Division Directors
Regional Counsels
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COMPENDIUM OF GOOD IDEAS

Models of Success and Lessons Learned

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ACKNOWLEDGEMENT

The Superfund Revitalization Office would like to thank the Regional staff and management that participated in the SRO's Regional office visits and contributed the good ideas for inclusion in this Compendium. Although too numerous to thank individually, this compendium presents their good ideas.

Appreciation is also extended to the individuals that participated in the Regional visits. These individuals include Sue Andersen, Barbara Bach, Bruce Bakaysa, Felicia Barnett, Tai-Ming Chang, Filomena Chau, Lance Elson, Peter Feldman, Tim Fields, Awilda Fuentes, Linda Garczynski, Lois Gartner, Mike Gifford, Trish Gowland, Tim Grier, JoAnn Griffith, Ann Hamann, Ben Hamm, Pat Hawkins, Robert Heffernan, Loren Henning, Stan Hitt, Ronald Jackson, Terri Johnson, Ika Joiner, Sven-Erik Kaiser, Carolyn Kenmore, Amy Legare, Ken Lovelace, Jim Maas, Shahid Mahmud, Jennifer Maloney, Richard Nalesnik, Charles Openchowski, Pam Phillips, Ceil Price, Earl Salo, Joe Santarella, Ken Skahn, Bill Steuteville, Chris Thomas, Patricia Tidwell, Jan Young, Stuart Walker, Kay Waters, Ron Wiley, Candace Wingfield, and Kerry Wolferts. This Compendium would not have been possible without the generous assistance provided by all involved. Special thanks is also extended to Beth Aschinger, Barb Dean-Hendricks, Pat Martz Kessler, and Cathy O'Connell for their support in this effort.

EXECUTIVE SUMMARY

Introduction

In October 1991, the Environmental Protection Agency announced a series of Superfund revitalization initiatives, with the mandate to seek ways to increase the efficiency, effectiveness, and equity of the Superfund program. As one element of this agenda, the Superfund Revitalization Office (SRO) embarked upon a series of visits to each of EPA's ten Regional offices seeking innovative ideas, successfully implemented policies and practices, and lessons learned from past actions. During the Regional visits, the SRO spoke to both staff and managers involved in implementing the Superfund program, thus ensuring that the full scope of Superfund experiences was represented. This Compendium of Good Ideas, Volumes 1 and 2, presents some of the innovative or good ideas, successes, and lessons learned discussed during these visits.

The entries selected for inclusion in this Compendium of Good Ideas reflect several over-arching themes that are common among many of the Regional offices. While the individual entries range from procedural tools to community involvement activities, these over-arching themes indicate the broad array of Superfund initiatives that are being undertaken. These themes can be summarized as follows:

- Cooperative streamlining initiatives;
- Enforcement streamlining practices;
- Removal program procedures and activities;
- Remedial program challenges and efforts to improve program performance;
- Contract management and process enhancements;
- Internal communications efforts;
- External communications (e.g., community relations); and
- State activities and relationships with EPA.

Within these categories, the majority of the entries deal with methods to promote consistency, reduce duplication, conduct training, share information, build teams, and support EPA staff.

Volume 1

The entries in Volume 1 illustrate, in some detail, measures undertaken in each Regional office to improve the implementation of the Superfund program. The entries provided in Volume 1 are in no way intended to imply that this is the only activity the Regional office is pursuing to achieve program improvements or that these are the best ideas identified by the SRO. Rather, the entries in Volume 1 are highlights of the unique, innovative, or transferrable initiatives identified. A brief description of the 19 Volume 1 entries, organized by the above-specified categories, is provided below.

Three cooperative streamlining initiatives undertaken by the Regions are included in Volume 1: ***Plug-In ROD***, ***Targeted Industry PA/SIs***, and ***Streamlining Initiatives/Lightning RODs***. Region 9 designed a "Plug-In" Record of Decision that preserves the flexibility of the Superfund process while accelerating site cleanups. Region 8 implemented a pro-active site discovery program whereby sites are grouped for screening and preliminary sampling in order to focus Regional resources on the most hazardous sites. Region 6 formalized case teams and implemented a "Lightning ROD" pilot project that saves time and resources while improving the quality of Superfund work.

Entries relating to enforcement streamlining initiatives include ***Cost Recovery Documentation***, ***EPA/DOJ Relationship***, and ***Compliance Oversight Procedures***. The Cost Recovery Documentation entry provides information on Region 3's development and implementation of cost recovery documentation packages, while the EPA/Department of Justice Relationship entry outlines the initiatives that contribute to the positive working relationship between Region 3 and the Department of Justice. Region 5's compliance oversight entry highlights procedures for monitoring and enforcing administrative and judicial orders and decrees.

Several Regions presented initiatives concerning the Removal and Remedial program procedures and activities. These initiatives include the widely acclaimed ***Field Administrative Support Personnel*** concept developed and implemented by Region 3, the ***Disaster Response Procedures*** used by Region 4 in the wake of Hurricane Andrew, the ***Bureau of Reclamation Removal Support*** that Region 8 receives, and the ***In-House RI Preparation*** program implemented by Region 4.

Four Volume 1 entries relate to contracts management: ***ARCS Contracts Management Procedures*** used successfully by Region 1, two Independent Government Cost Estimate entries, and an alternative contracting entry. The ***IGCE Coordination*** entry describes the systems and materials developed by Region 5 to improve the quality of cost estimates, while the ***Budget Planning Using IGCEs*** entry details Region 7's implementation and application of Independent Government Cost Estimates. The ***Alternative Contacting for Rapid Response*** entry outlines the strategies successfully used by Region 10 to expedite Removal and Remedial actions.

Three external communication ideas are presented in Volume 1. Region 2 implemented a program of ***Door-to-Door Congressional Briefings*** that increased the awareness and understanding on the part of the Congressional members regarding the Superfund process and specific sites in their States. Region 6 initiated a number of ***Innovative Community Involvement Techniques*** including store-front offices, a toll-free Superfund information line, and a "Superfund 101" class. Region 10 performed ***Property Values and Lender Liability Outreach Activities*** in an effort to educate and address the concerns of people regarding the effect of Superfund on property values.

Two State-related initiatives are included as Volume 1 entries: ***New Jersey ROD Forum*** and ***State Involvement***. Region 2 held a forum with the State of New Jersey to discuss the required elements of a Record of Decision and the parameters under which New Jersey

Superfund staff operate. Region 5 is participating in several ongoing initiatives directed at encouraging a greater level of State participation.

Volume 2

The entries in Volume 2 are more numerous than the entries in Volume 1, but less detail is provided on these entries. Approximately 250 entries are included in Volume 2. Volume 2 is designed to be a reference document for Superfund staff. It presents initiatives and innovations across the spectrum of Superfund program areas. The entries in Volume 2 are organized by the eight theme categories referenced previously and provide a short definition of a problem, the action taken, and any benefits associated with each initiative. The entries are designed to provide enough information to determine if a particular initiative merits further investigation and provides a contact name and telephone number to obtain additional information.

Communication

Distribution of the Compendium of Good Ideas is the first step in sharing successful Superfund program management ideas across the Regional offices and Headquarters. Additional mechanisms will be developed to continue communicating and updating the ideas presented in the compendium and to gather new ideas. Possible approaches include national meetings, fact sheets, newsletters, demonstrations, presentations, a speakers bureau, electronic bulletin boards, teleconferences, and other training methods. A Good Idea Tear Sheet is attached at the end of each volume of the Compendium of Good Ideas, to invite continued participation in the sharing of ideas.

INTRODUCTION

This Compendium presents the results of a series of Regional office visits conducted to solicit information on innovative and unique ideas to improve the Superfund program. The Superfund Revitalization Office (SRO), with support from several Headquarters offices, identified a multitude of initiatives implemented by the Regional offices to enhance Superfund program practices. These initiatives increased the speed and consistency of site cleanup, improved community and internal communications, and enhanced the overall performance of the Superfund program. The SRO identified many ideas that may be transferrable from one Regional office to another to strengthen the Superfund program.

Organization of the Compendium

The Compendium of Good Ideas is organized in two volumes. Volume 1 is intended primarily for Superfund program managers and presents a sampling of the best ideas discussed during the SRO Regional visits, while Volume 2 is designed as a resource tool for Superfund program staff. Volume 1 contains descriptions of some Regional initiatives that the SRO found unique, innovative, or transferrable. Volume 2 presents additional Superfund program initiatives identified during the SRO's Regional visits, however, less information is provided on these entries.

Volume 1

Volume 1 introduces the organization of the Compendium with sections providing background information on the SRO and the Regional visit process. Highlights of Regional innovations are presented in some detail in Volume 1 and are organized by Regional office.

Volume 2

Volume 2 is designed to be a reference document for Superfund staff. It presents initiatives and innovations across the spectrum of Superfund program areas. The entries in Volume 2 do not provide all of the information required to implement an initiative, but are designed to provide an overview of each initiative. The descriptions provide a short definition of the problem, the action taken, and any benefits associated with each initiative. The entries are designed to provide enough information to determine if a particular initiative merits further investigation and provides a contact name and telephone number to obtain additional information.

The entries selected for inclusion in the Compendium reflect several themes that the SRO found are common among many of the Regional offices. These over-arching themes indicate the broad scope of initiatives undertaken by the Regional offices. Volume 2 is organized into the following categories or over-arching themes:

- Cooperative Streamlining
- Enforcement Streamlining
- Removal
- Remedial
- Contracts
- Internal Communications
- External Communications
- States

Within each category, entries are divided into subcategories to make Volume 2 of the Compendium more useable. For example, the Enforcement Streamlining category includes subjects such as *Enforcement Models*, *Settlement Strategy*, and *Information Collection* (as well as others) as subcategories. This allows the Compendium user to locate all entries related to a specific subject contained within a category.

BACKGROUND

Formation of the Superfund Revitalization Office

On October 2, 1991, the Environmental Protection Agency (EPA) named the Office of Solid Waste and Emergency Response Deputy Assistant Administrator Richard Guimond to the new post of National Superfund Director and announced the formation of the SRO. The SRO was given the responsibility for seeking ways to improve the efficiency, effectiveness, and equity of the Superfund program.

The SRO is comprised of staff from EPA's Regional program offices and several Headquarters offices to provide representation across the broad breadth of Superfund experience. Regional representatives include Remedial Project Managers (RPMs), On-Scene Coordinators (OSCs), and Office of Regional Counsel (ORC) attorneys. SRO members from the Office of Solid Waste and Emergency Response, the Office of Emergency and Remedial Response, the Office of Waste Programs Enforcement, the Office of Solid Waste, the Office of Enforcement, the Office of General Counsel, the Office of Administration and Resources Management, the Office of Research and Development, the Office of Federal Facilities Enforcement, and the Environmental Response Team (ERT) represent the Headquarters Superfund program. In addition, the SRO has representatives from the DOJ, the Bureau of Reclamation (BuRec), the Department of Defense, and the Agency for Toxic Substances and Disease Registry.

Regional Visits

In late 1991 and early 1992, Rich Guimond visited all of EPA's ten Regional offices to discuss Regional views regarding the challenges confronting the Superfund program and possible approaches to those challenges. The SRO formed a team to follow up on those trips by visiting the Regional offices to continue exploring opportunities to improve the Superfund program. The Regional visits were conducted during July through November 1992 with the SRO Team spending two days in each Region. These trips were not audits, Regional reviews, or training sessions; rather, the SRO Team listened to each Region's ideas regarding how to improve Superfund.

Teams consisting of SRO members and other Headquarters personnel traveled to each EPA Regional office to seek innovative ideas, successes, and lessons learned from staff and managers working in and with the Superfund program. While in each Region, the SRO Team conducted a series of focus group sessions with Regional personnel and conducted an entry and exit meeting with senior Regional managers. The focus group sessions were held with both staff and program managers and included the entire scope of Superfund activities: removal/site assessment, remedial, internal communication, information management, contracts, potentially responsible party (PRP) searches, cost recovery, and community and governmental affairs.

HIGHLIGHTS OF REGIONAL INITIATIVES

The 19 entries presented below highlight some of the best initiatives identified. Approximately 250 Regional ideas are presented in an abbreviated format in Volume 2 of the Compendium.

ARCS CONTRACTS MANAGEMENT PROCEDURES

Contact: Hilary Kelley, Chief, Superfund Contracting Section, Region 1
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Maggie Leshen, Chief, Contracts Management Section, Region 1
617/573-5795

Region 1 is a leader in Alternative Remedial Contracts Strategy (ARCS) contract management. A combination of initiatives is the basis for success in the Region. These efforts include developing successful working relationships between the project officers (POs) and the contracting officers (COs), the staff and the ARCS contractors, and the Region and the United States Army Corps of Engineers (USACE), as well as developing tools to facilitate effective ARCS contract management.

The POs and COs have an excellent working relationship, with their roles and responsibilities defined in formal Memoranda of Understanding (MOU) addressing award fees, subcontracts, new work assignments, and future work. The POs and COs share a mutual respect for each others' expertise, objectives, and deadlines. The COs attend health and safety training, are familiar with the sites, and understand the nature of the work. Communication between the POs and COs in all Region 1 offices is facilitated by the local area network (LAN). In the absence of one CO, other COs can access floppy disks containing contract information. The types of contract information that may be electronically accessed include contract status, current work assignments, and modifications.

A key element in managing ARCS contracts has been an active ARCS Regional Management Team, consisting of Branch Chiefs representing the Waste Management Division (WMD) and Planning & Management Division and supported by the Superfund Contracting Section and the Contracts Management Section. Regional managers and the contracts program staff met with the ARCS contractors in the spring of 1992 to discuss the Region's priorities and goals and to exchange information with the ARCS contractors. The Region followed up with each contractor individually to obtain their feedback and ideas. The Region is planning to repeat this process annually because Regional interaction with the ARCS contractors during the planning stage results in better contractor understanding of Regional expectations and the work to be undertaken, hence better contractor performance.

In addition to the Regional Management Team, the New England Division of the USACE provides the Region with technical assistance for ARCS design and construction activities and

Independent Government Cost Estimates (IGCEs). A MOU is being developed among the Region's POs, COs, and RPMs to address IGCE roles and responsibilities.

Another contracts management tool used by the Region is the "Seven-Day Scoping Letter." This tool is used by RPMs to ensure that the contractor shares an understanding of the project's scope. All contractors are required to submit a "ball-park" cost estimate within seven days following the work assignment kick-off meeting. This requirement ensures that the contractor does not spend too much time developing a work plan without a clear understanding of the project's scope.

In addition, the Region developed a system to track program management costs to achieve the fiscal year (FY) 1992 15 percent program management cost goal. This system requires that all ARCS contractors submit estimates of program management costs for FY 1993, which were either approved or reduced, without negotiation. Oversight of contractor performance includes evaluation of the contractor's success in meeting their program management goal.

Finally, a database system also was developed to track payments for and movement of government-purchased equipment, so equipment can be more easily shared among contractors. This system has been distributed to the other Regions.

DOOR-TO-DOOR CONGRESSIONAL BRIEFINGS

Contact: Peter Brandt, Congressional Liaison, Region 2
212/264-7834

Region 2 implemented a program of door-to-door Congressional visits to brief members of Congress and their staff in Washington, D.C. on the status of Superfund sites in their States and districts. This effort was initiated by the Region in 1992 and was very well received by Congressional members and their staff. All Senate and House members representing districts in Region 2 chose to participate in the individual briefings. A total of 30 briefings were presented in 1992 and the Region plans to continue these in the future. The Region not only provides information on the current status of existing sites, but also educates Congressional members that currently do not have existing sites in their districts on what they can expect if a site is identified in their State or district. These briefings increased awareness and understanding on the part of Congressional members regarding the Superfund process and sites in their State or districts.

The briefings were conducted by teams comprised of the Director or Deputy Director of Superfund, Branch Chiefs, Section Chiefs, and Congressional Liaison staff. They spoke to Congressional members and staffers including Legislative Assistants, Administrative Assistants, and Press Secretaries. The personalized briefings addressed the individual needs of Congressional offices. For example, the Puerto Rico delegation appreciated the personal

attention and the Region's ability to address the language and cultural needs of the delegation.

For each briefing, the Region prepared a book that provided an overview of all Superfund sites in Region 2 and the current status of each Superfund site in the respective member's State or district. The door-to-door briefings allowed the Region to provide information and updates on all sites within a State or district, not just the high profile sites. The Region's ability to provide specific information on each site is very helpful to Congressional staff since many are not familiar with the sites in their State or districts or the current status of the sites. These briefings keep the Congressional offices apprised of the status of Superfund sites and allow them to respond to questions raised by their constituents.

REGION 2/NEW JERSEY ROD FORUM

Contact: Charles Tenerella, Chief, Central New Jersey Section, Region 2
212/264-9382

At the request of New Jersey's Superfund program director, the Region held a two-day Record of Decision (ROD) forum with the State. The forum provided an opportunity for the Region to communicate to State officials the essential and critical elements that must be included in a ROD per Federal regulations contained in the National Contingency Plan (NCP). In turn, Regional staff were made aware of the parameters under which the New Jersey Superfund staff must operate, especially concerning the application of State applicable and relevant requirements (ARARs) and the preparation of RODs. The forum was an extremely useful and successful event, and will be held again in FY 1993.

The Region distributed packets of information to State staff containing a "checklist" (i.e., basic outline) of the ROD format and other applicable materials. Lectures, working sessions, and EPA/State team discussions were held at the forum. The project teams were able to communicate the differences between Federal and State regulations and systems and differentiate between real and procedural difficulties.

Total quality management (TQM) exercises were held to discover the procedural issues restraining both the Region and the State. When an issue could not be resolved by the teams (e.g., cleanup levels), it was escalated to management and a presentation was given on the issue. The managers listened to the presentations and if the issue was able to be resolved at that time, decisions were made accordingly.

The forum provided an environment for staff to identify ROD issues and to work toward resolution together. The Region and State worked together to create a scenario that would allow RODs to move forward without delays. For one ROD, an interim remedy was chosen until the remaining issues could be resolved. On another site, the ROD was divided into operable units to allow site cleanup to proceed.

COST RECOVERY DOCUMENTATION

Contact: Leslie Vassallo, Environmental Protection Specialist, Region 3
215/597-3171

The cost recovery documentation packages developed by Region 3 are national models in this area. As a result of the process they created, Region 3 maintains and provides to DOJ documents demonstrating the amount of money expended and the specific work activities that are undertaken at a particular site. Complete packages of cost information, including both financial and "work performed" documentation, are available to the Region and DOJ in a user-friendly format.

In 1984, the Region began dedicating resources to provide DOJ with a detailed breakdown of site-specific tasks and the costs associated with these tasks. In addition to providing DOJ with a summary of financial information, the Region describes and explains each task undertaken at a site through the use of "work performed" documents. These documents include work assignments, technical direction documents, acknowledgments of completion, and delivery orders. It is difficult and time intensive for DOJ to find this information, especially for old contracts. Because the Region houses and maintains the "work performed" documents in a central file room, Regional staff have easy access to the task-by-task reporting information. As a result of Region 3 providing this information, DOJ is able to focus on successfully litigating cases, rather than gathering the necessary documentation.

Preparation of the Region's cost recovery documentation packages is a team effort. The Regional Finance Office compiles and reconciles the payroll, travel documents, and contractor invoices. The Cost Recovery Section compiles and summarizes the "work performed" information in the cost summary report. Finally, the Region works closely with DOJ to continuously improve the cost packages.

EPA/DOJ RELATIONSHIP

Contact: Seth Low, Associate Chief, RCRA/CERCLA Remedial Branch, Region 3
215/597-3977

Region 3 and DOJ have developed a very positive working relationship. This relationship developed as a result of a number of initiatives, including encouragement from EPA management for staff to work directly with DOJ when problems arise. Improved working relations helped speed up the enforcement process and fostered mutual respect between the Region and DOJ.

The proximity of Region 3 and DOJ offices in Philadelphia allows Regional and DOJ staff to meet in person as needed. In addition, the Region and DOJ have a MOU outlining roles, responsibilities, and turnaround time on referrals. Regional and DOJ management are

committed to making their relationship work. Regional management encourages staff to work towards building solid relationships, to solve problems when they arise, and to take extra steps to meet DOJ's needs. For instance, DOJ experienced difficulty obtaining Regional phone directories for staff use. In response to DOJ's need, Region 3 collected directories and delivered them to DOJ.

A key mechanism for building and maintaining close relations has been the monthly docket reviews conducted by the WMD, the ORC, and DOJ. Attendance by DOJ increased the sense of teamwork and accelerated the enforcement process since all relevant parties are present at the docket reviews. The Region and DOJ prevent problems before they occur by providing early warnings to each other on volatile issues.

Additional communication improvements resulted from DOJ extending the Amicus system, an internal DOJ word processing system, to Region 3. The system provides access to legal research tools and allows the Region to send word processing documents directly to DOJ attorneys for review. As a result, both the Region and DOJ save time and resources by working in the same format.

FIELD ADMINISTRATIVE SUPPORT PERSONNEL

Contact: Chris Thomas, Enforcement On-Scene Coordinator, Region 3
215/597-4458

Region 3 developed and implemented the widely acclaimed Field Administrative Support (FAS) personnel concept to provide support to the Removal program. The FAS personnel provide the OSCs with administrative record and contract management oversight support. In response to the tremendous need for FAS, the Region re-allocated resources to increase removal support staff. There are currently five FAS full-time equivalents, and the Region plans to implement a program that assigns a lead FAS person to each site. The lead FAS person will be dedicated from the start to the finish of the site project. The success of this cross-divisional group consisting of FAS, site assessment officer, CO, PO, and contracts specialist (CS) staff was recognized with an award as Superfund Regional Team of the Year.

The FAS staff provide on-site support that relieves a huge burden from OSCs and allows them to focus on the physical site work. The FAS staff set up and maintain site administrative record files which are color coded and maintained together at all times. The FAS staff also track removal site cost documentation through a cost management tracking system. Because several FAS staff were previously Office of Inspector General finance staff, they have expertise in handling cost documentation. Docket preparation assistance is also provided by FAS staff. Improved cost documentation and case preparation resulting from FAS staff efforts directly contributes to successful cost recovery actions.

Contract management oversight support by FAS staff includes maintaining invoice review documentation, conducting "friendly" audits, and "sampling" sites to assess vulnerabilities.

Emergency Response Cleanup Services (ERCS) invoices, progress reports, and routine paperwork are reviewed by FAS staff. In addition to setting up management controls, FAS staff track equipment and flag daily charges on EPA Form 1900-55. FAS staff follow procedures and practices contained within a Regional handbook, which promotes consistency. FAS staff also monitor Technical Assistance Team (TAT) hours and help with invoice review. To provide continuity between site activities and the Regional contracts staff, the FAS staff interact with COs and CSs on a regular basis. The contract support provided by FAS staff decreases the Region's dependence on contractors for ERCS cost documentation.

DISASTER RESPONSE PROCEDURES

Contact: Mike Norman, Chief, Emergency Response Section, Region 4
404/347-3931

Region 4 mobilized their Disaster Field Office (DFO) prior to Hurricane Andrew's assault on South Florida. The Region's response to Hurricane Andrew was based on their experiences with Hurricane Hugo and the newly enacted Federal Response Plan. The DFO, two OSCs, and several TAT contractors were mobilized to Florida prior to the arrival of Hurricane Andrew. Once the storm passed, emergency response crews were ready for action. A helicopter was used to survey those areas hit by the hurricane to identify large spills and releases. Seventeen spill sites involving oil and/or chemicals were cleaned up in the wake of Hurricane Andrew.

Region 4 coordinated their emergency response as part of the Federal Response Plan. The Federal Emergency Management Agency (FEMA) notified the Region of a possible landfall for Hurricane Andrew five days prior to the hurricane strike. Early notification by FEMA allowed the Region to be proactive in its disaster response preparation. The Region immediately began checking on the availability of OSCs, what current sites needed to go forward, and what sites could be postponed. The Region mobilized the DFO, a 37-foot trailer equipped with computer and communications equipment, two OSCs, and several TATs to Florida the day before the hurricane so that they would be on location to begin immediate cleanup. In addition, prior to the hurricane strike, the Region made arrangements through an existing contract to have access to a helicopter and pilot immediately after the strike to look for spill sites. After the hurricane landfall, two additional OSCs were deployed to Florida to assist in cleanup activities.

The day after the hurricane strike, the OSCs used the helicopter to look at large known tank sites to identify releases that would be immediately dangerous to public health and the environment. The air surveillance allowed the OSCs to cover more area than would otherwise be possible. The OSCs identified two large spills (100,000 gallons of Fuel Oil No. 6 and 150,000 gallons of JP-4 jet fuel) and arranged for cleanup. In addition, the DFO inspected 34 sites in Dade County. Nineteen sites either needed no cleanup or responsible parties had already initiated cleanup. Fifteen sites were cleaned up by the DFO crew. The

U.S. Coast Guard Strike Team, which was already on location with experienced spill cleanup personnel and resources, assisted in the cleanup of four sites.

Cleanups performed by EPA primarily consisted of three activities: (1) overpack leaking drums; (2) remove and stockpile contaminated soil on site; and (3) pump large spills back into tanks. In addition, the OSCs identified seven drums of material of unknown origin and arranged for the disposal of these drums. The Region took a "service-oriented" approach to cleanup. They took care of immediate problems and left the disposal of contaminated material to the property owners. The emphasis was on cleanup following the hurricane, not enforcement, which allowed the DFO to focus on human health concerns.

IN-HOUSE RI PREPARATION

Contact: Don Hunter, Environmental Scientist/Regional Expert, Region 4
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The in-house remedial investigation (RI) program is a great success in Region 4. Since 1985, Region 4 initiated/completed 14 in-house RIs (an average of two RIs per year), which ranged from simple to complex. The staff enjoy the opportunities presented by the program and benefit from the training experience. The program is cost effective and provides Region 4 with the ability to either take back or complete RI work initiated by others when necessary. Overall, the in-house RI program gives the Region increased control over and impact on the remediation of Region 4 Superfund sites.

The in-house RI program was developed by the Region 4 Remedial Branch and the Environmental Services Division (ESD). It includes the combined efforts of ESD staff, RPMs, and risk assessors. The applicable Division Directors agreed to work together in the RI program without formal procedural documents. There are no established rules for the division of labor in the RI work plan, rather the division of labor is decided on a site-by-site basis. Region 4 has a structured approach for interdisciplinary peer review for the quality assurance of the work product. The Region uses a TQM approach to meet their needs in the absence of formal procedural documents. Under the Region's approach, ESD is responsible for field coordination and data gathering. ESD also supplies the RPMs with the field investigation reports.

Prior to work plan development, scoping meetings are held by the peer review group staff to provide quality assurance up front. During the work plan development stage, scoping meetings are held that include all staff with data needs, including the site risk assessors. The ground water and soil data gathered during the RI are used for modeling purposes and the modeling results are used in the risk assessment. Region 4 conducts multiple in-house RIs simultaneously and coordinates field work deadlines. Coordination of field work activities is accomplished without formal coordination protocols.

There are many benefits resulting from the Region 4 in-house RI program. A study was undertaken on the costs of conducting in-house RIs versus contracting for RI work. The study findings confirmed an in-house RI cost savings of one-third to one-half over a contractor-conducted RI. The in-house RI program is a morale builder and excellent training for new and established Region 4 staff. Staff obtain hands-on experience in RI tasks and how they should be performed. This improves their ability to provide high quality oversight of RI work performed by contractors. The in-house RI experience also provides RPMs with a more realistic perspective of contracts management, IGCE preparation, and the collective aspects of field investigation.

COMPLIANCE OVERSIGHT PROCEDURES

Contact: Jim Mayka, Chief, Michigan/Wisconsin Remedial Response Branch, Region 5
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Region 5 established procedures for monitoring and enforcing Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) administrative and judicial orders and decrees to ensure that expeditious, effective, and consistent enforcement actions are taken. These procedures assist staff in determining and documenting the appropriate enforcement response to violations of terms and schedules stipulated in orders and decrees. The Region developed clear guidance and procedures, for the effective use of statutory authorities and enforcement mechanisms in settlement documents, in response to an Office of Inspector General audit report recommendation.

According to the Region's procedures, all non-compliance by PRPs of schedules or other conditions established in an order or decree must result in an appropriate enforcement action, accompanied by written documentation of that action. The procedures outline the elements necessary to ensure timely, effective, and consistent enforcement responses. Upon determining that a violation of the decree/order occurred, an appropriate enforcement response is formulated by the RPM, OSC and Assistant Regional Counsel. The procedures provide specific instructions for responding to each violation and include a range of potential appropriate enforcement responses and detailed implementation instructions.

The procedures also institute an obligation on the part of the assigned RPM/OSC to report to their supervisor and case attorney on a monthly basis as to the whether or not the PRPs are in violation of the order or decree. The reporting format will allow the RPM/OSC to simply indicate the PRP status of either "in compliance" or "in violation." Model formats for the initial letter to the PRPs describing the non-compliance and the Recommendation of Action in Response to Violation will be developed as violations are acted upon, pursuant to the outlined procedures. New guidance is also being developed by Region 5 for preparation of Section 109(c) penalty action referrals, which will include a model litigation report and complaint.

IGCE COORDINATION

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Region 5 provides IGCE preparation support and training to all applicable staff through the IGCE coordinator. In addition to developing systems and material for Region 5, the coordinator has provided national leadership in improving Superfund's cost estimates. The coordinator's primary role is to develop database systems on which to base cost estimates, support Work Assignment Managers (WAMs) in IGCE preparation, and maintain and modify the databases. The level of support and training is gauged by each sections' needs. A separate database is developed for each type of work (e.g., RIs, PRP searches), with one database for enforcement-lead sites and one for Fund-lead sites. These databases are based upon historical information, listing the contractors and their past costs on work performed. The databases are written in dBase III Plus, a user friendly software program, and are LAN accessible.

The Region's IGCE coordinator began by creating a database to assist the RPMs and to be used for training purposes for all groups that prepare IGCEs. Initially, all RPMs go through the coordinator for assistance. Once the RPMs are up-to-speed, they can access the database system directly, and the level of IGCE support will depend on the individual needs of the RPMs. The process has helped the WAMs plan expenditures, write more detailed Statements of Work (SOWs), and negotiate with contractors more effectively, resulting in EPA receiving a higher quality of performance from its contractors.

Certain groups (e.g., Community Relations) have very specific scopes of work, allowing for the development of a standardized SOW and database of information. Eventually, the standard SOW and database will provide sufficient IGCE information to those groups, diminishing the need to go through the IGCE coordinator. At that point, the coordinator's role will consist of maintaining the databases and providing additional training and support for specialty needs.

STATE INVOLVEMENT

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Region 5 is participating in a number of ongoing initiatives directed at fostering a greater level of State participation. Region 5 currently has a Superfund Memorandum of Agreement (SMOA) with 5 of the 6 States in the Region and will have a SMOA with all 6 States by the end of FY 1993. A SMOA between the Region and a State helps resolve disputes, promotes understanding, and clarifies the issues and roles of both parties. In addition, under a TQM

effort, the Region held training sessions with States to improve the level of understanding of each other's position.

Under one initiative, the Region 5 State liaison staff are developing a policy on assigning State leads at Superfund sites. The policy will be implemented in FY 1993 and will define when and under what conditions it is appropriate for the States to take the lead at National Priorities List (NPL) sites. The States' past performance and current work load will be taken into consideration under the policy. Implementation of this policy will promote consistency and certainty in the process of designating site leads.

Another Region 5 initiative involves including the States on the Regional Decision Teams (RDTs) for SACM pilot studies undertaken at sites in their respective States. The inclusion of the States on the RDTs will result in a joint EPA/State strategy, allow for the use of State resources, and alleviate potential disputes that might otherwise arise.

In an effort to increase the opportunity for State participation, the Region held its annual Removal program retreat at one of the Region 5 State's capitol each year for the past two years. The retreats included training sessions and provided a forum for informal information exchange. The location of the retreat at States' capitols allows a greater number of State employees to attend. The Region plans to continue holding the annual retreat at State capitols, extending the opportunity to States not yet visited.

In addition to recent initiatives, Region 5 has a history of aggressively awarding CORE Grants to States for the development of the infrastructures, data systems, and accounting systems needed to develop and implement State Superfund programs. The Region also continues to provide States with training and participation in EPA work groups (e.g., Biological Technical Assistance Group), policies, and guidance, especially when the subject matter involves a particular State.

STREAMLINING INITIATIVES/LIGHTNING ROD PILOT PROJECT

Contact: Carl Edlund, Chief, Superfund Program Branch, Region 6
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Region 6 developed several initiatives to streamline the Superfund process. Among the streamlining initiatives are case management teams and the Lightning ROD pilot project. The Region formalized the case management team with an internal MOU. The Region 6 Lightning ROD pilot project is the first streamlining pilot project developed by EPA. The pilot project pre-dates SACM and all other SACM-like pilot projects developed by other Regions are based on the Lightning ROD pilot. Streamlining initiatives speed up the Superfund process, while improving the quality of deliverables and reducing project costs.

The Region developed one general MOU among all participating programs involved in the Superfund process and created a case management team approach to sites. The case team

decides site priorities and assigns a lead office. The Region holds interdivisional as well as Branch Chief meetings to involve all programs in site decisions. A case team approach also is used to determine what constitutes "imminent and substantial endangerment," which may require a shift in site priorities. In addition, the Region has a successful peer review program in a variety of program areas to streamline the Superfund process.

Region 6 initiated the Lightning ROD pilot project for three sites (i.e., 2 creosote sites and 1 abandoned dump) in November 1991 to improve the quality and speed of site remediation. As part of the Lightning ROD pilot, the Region completed planning and budgeting for the sites prior to NPL proposal. The Lightning ROD pilot combines the RI, feasibility study (FS), and remedial design (RD) concurrently to shorten the time spent in preconstruction study and design. The Region reviewed past RI/FSs, RODs, and treatability studies to focus the studies and long-term goals for the pilot sites. Additional techniques include the use of expedited analytical data, standardized risk assumptions, expanded use of historical aerial photographs, well-defined contract deliverables to reduce redundancy, and an emphasis on waste quantification.

Region 6 involved the community relations staff at the beginning of the Lightning ROD pilot. Open houses were held the day of NPL proposal for the sites to provide information to the affected communities. The same opportunities for public interaction occurred for the pilot project sites as for traditional Superfund sites, however within a shorter time frame. For one of the sites, the community thought the Region was proceeding too quickly at the site so a second public hearing was scheduled to explain the Region's activities.

Benefits of streamlining initiatives include saving time and resources and improving the quality of Superfund work. The Region is 3 to 5 years ahead of the schedule for the three sites included in the Lightning ROD pilot in comparison to an average, traditional Superfund site. While a complete analysis of cost savings from the Lightning ROD process cannot be conducted until completion of the RD, the Region is projecting a cost savings of up to 50 percent of the costs that would be incurred under the traditional Superfund process. In addition to the projected cost savings, a number of the initiatives included in the pilot project are likely to improve the quality of decision documents developed for these sites.

INNOVATIVE COMMUNITY INVOLVEMENT TECHNIQUES

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Region 6 initiated a number of innovative community involvement procedures including store-front offices, a toll-free Superfund information line, a "Superfund 101" class, and quarterly Superfund progress reports and updates.

The concept of a store-front (or satellite) office was originally developed for the Vertec Chemical site in Jacksonville, Arkansas. The Region now has three operational satellite

offices and another one is scheduled to open in early 1993. These offices provide Region 6 with a surrogate presence in the community, which reduces travel cost and maximizes staff time to devote to site cleanup. Satellite offices are effective as a local information resource, community liaison mechanism, and a tangible symbol of EPA's commitment to community involvement at Superfund sites.

In response to community concerns and information needs, Region 6 implemented a toll-free Superfund information line that provides direct, no cost access to the Agency. The toll-free line addresses a common concern that citizens cannot afford to call the Region for the information they need. The toll-free line provides access to Superfund program staff for site-specific information, provides general Superfund program information, access to reference and guidance materials, a means to report suspected trespassing on Superfund sites, and a means to report new and suspected hazardous waste sites. In addition, the Region conducts follow up "quality service calls" to determine if Superfund information line met the users' needs to their satisfaction.

Another innovative community involvement effort is the 3-hour "Superfund 101" training sessions offered by the Region to citizens and local residents at newly listed Superfund sites that explain the Superfund listing and remedial processes. During this training, role playing is used to acquaint citizens with the various issues involved in the Superfund process and the complexities associated with site cleanups. Shortly after the training session, a citizens' scoping meeting is held to describe the general scope of the planned RI and to obtain the public's input.

In addition, the Region prepares and circulates quarterly reports on progress at Superfund sites to approximately 10,000 people on the Region 6 Community Relations mailing list. These reports contain concise summaries of the background and remedial status of each NPL site and give contact names in Region 6. The quarterly reports are being expanded to include selected SACM and removal sites in addition to high profile Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) sites undergoing assessment. The reports also are useful as periodic updates to the print and broadcast media on Superfund activities in Region 6.

BUDGET PLANNING USING IGCES

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The implementation and application of IGCEs is an integral part of the continuous improvements achieved within the Region 7 contracts management program. Approximately $2.3 million in projected cost reductions resulted from the process improvements implemented by the Region. These reductions are a direct result of the combined efforts of POs, COs, and RPMs and the improvements made in writing the SOW, developing IGCEs,

conducting scoping meetings, and negotiating work plans. In recognition of contributions to the IGCE process and the resulting impacts on contracts management as a whole, cash awards and certificates for excellence have been awarded to Regional staff.

The Region's IGCEs are prepared by RPMs and reviewed by POs. To assist the RPMs, zone administrative procedures (ZAPs) were written and a Lotus 123 spreadsheet was created by a CO. The ZAPs define the rules on roles and responsibilities and the spreadsheet provides for a task-by-task budget projection with the appropriate multipliers that automatically adjust costs. The spreadsheet was placed on the LAN to provide accessibility to the RPMs, and a user-friendly operating manual was prepared.

The IGCE is based on the SOW for the total project, not by the different phases of the project. This enhances the Region's ability to determine appropriate adjustments to the project's budget and the incremental funding plan after reviewing the IGCE. The funding may not exceed the IGCE, which increases the value of the Superfund Comprehensive Accomplishments Plan as a budgetary tool.

Developing IGCEs is beneficial in identifying Regional project performance objectives. These objectives are clearly communicated to the contractor at the start of the project. Team meetings (i.e., PO/CO/RPM) are held with the contractor to clarify the expectations and scope of the project. As a result, a more comprehensive SOW is written. The work plan negotiations also lead to a clear understanding of the SOW and are conducted within the IGCE parameters for the project.

TARGETED INDUSTRY PA/SIs

Contact: Steve Hawthorne, On-Scene Coordinator, Region 8
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Region 8 used a SACM initiative to group sites for screening and preliminary sampling. Working with State agencies, the Region screened large numbers of similar facilities to focus their resources on the most hazardous sites. This process was used twice by Region 8: for wood treatment facilities in Montana and for lead smelters in Utah.

The State of Montana requested assistance from Region 8 in assessing two wood treatment facilities. During the course of the assessment, the Region identified approximately 60 similar facilities within the State. Instead of conducting 60 separate Preliminary Assessments/Site Inspections (PA/SIs), the Region conducted a screening based on site location and length of operation. Using this screening tool, the Region determined that surface sampling was required at 75 percent of the facilities. The Region used the ERT and TAT to conduct site sampling and the results were used to target and prioritize sites.

Similarly, the State of Utah requested assistance from the Region in assessing former lead smelter sites. The State identified 34 abandoned smelter sites in Salt Lake County that operated during the late 1800's to the early 1900's. The Region investigated the smelters and identified 16 smelters of high priority for immediate assessment. The Region coordinated 50 people from the ERT, U.S. Coast Guard, and TAT and conducted an intensive surface sampling campaign over a period of three weeks. Approximately 1,600 soil samples were collected as part of the sampling effort. The results targeted several areas with higher risk of lead contamination for children.

BUREAU OF RECLAMATION REMOVAL SUPPORT

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The Department of Interior's BuRec has been utilized extensively by Region 8 since 1988 to enhance its Removal program capabilities. Technical assistance to the Region 8 Removal program by BuRec has been provided on more than 75 sites through Interagency Agreements (IAGs). The relationship between the two organizations has worked well because of good communications, good cost accounting, and quick response to requests.
The BuRec provides the Region with support in emergency response situations as well as support in the form of design and construction activities throughout the Removal program process. Through its original mission of water resource development, BuRec has experience and in-house capabilities in hydrology, geology, all types of engineering, drilling, ground water, geophysics, construction management and safety, value engineering, water treatment systems, independent government cost estimating, and soil cleanup, particularly at contaminated mine sites. When requested, BuRec provides a critical review of proposed removal activities in addition to the critique of specific technical documents. The Region also enlisted BuRec's assistance in advising States within the Region on the scoping and conduct of State procurements for removal activities. The BuRec also has emergency response capabilities that the Region relies upon. Utilizing BuRec's expertise, the Region decreased its reliance on contractors while still increasing its Removal program capacity.

The Region has found that by using BuRec they are able to rely upon BuRec's construction management experience in areas ranging from procurements to general contract administration and construction oversight. In addition, BuRec performs inherently governmental functions for EPA that are not easily performed by contractors and the necessary contracting services associated with these functions. As a recent example, BuRec undertook the technical and contracting response at the largest Removal action ever taken in Region 8, the Summitville Mine site. This was a multi-million dollar Removal action, involving the detoxification of a cyanide leach pad, reclamation of site mining waste, and

correction of ongoing acidic mine water drainage. Total cleanup cost for this site is estimated at over $60 million.

The Region attributes an increase of 25 percent of its Removal program capacity to the assistance provided by BuRec. The Region and BuRec use IAGs to formalize their working relationship and the IAGs range from general, broad technical assistance to site-specific IAGs. The BuRec's services are available to all EPA Regional offices.

PLUG-IN ROD

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Region 9 designed an approach, the Plug-In ROD, for use at mega-sites with multiple, similar operable units. Under this approach, a standardized remedy is selected that is applicable to several source areas within a mega-site. Use of this type of ROD is appropriate in cases where the site contains a significant number of source areas, the source areas are similar in physical characteristics, and a technical remedy is available that will apply to the majority of source areas. One unique feature is that the Plug-In ROD does not apply to a specific site at the time it is signed. Sites will be subject to the ROD as RIs are completed and the criteria for applying the ROD are met.

This innovative approach selects a remedy for the "basic" source area at a mega-site. The basic site is defined by the site characteristics, including contaminants, soil characteristics, and groundwater characteristics, for which the remedy is applicable. Characteristics outside these boundaries must be addressed by an amendment to the ROD, a Removal action, or another ROD altogether. The Plug-In ROD approach selects a remedy and develops the process by which source areas are determined to be subject to that remedy. The process for plugging in sites is based on ARARs and risk calculations. Included in the ROD is the framework for the risk calculations to determine if a source area may "plug in."

Once a decision is made to use the plug-in approach, one of three actions will be taken 1) the source area characteristics are directly addressed by the ROD, in which case the source area can directly plug in; or 2) the remedy is mostly applicable, but there are special considerations not addressed by the ROD, in which case the ROD must be amended; or 3) the source area is completely different than the operable unit in the ROD, in which case the source area must be addressed by a Removal action or a separate ROD prepared.

The benefits associated with this approach are numerous. The Plug-In ROD eliminates the need for a separate FS, ROD, and administrative record for each source area. In addition, the PRPs are able to move straight from the RI to remedial work or into negotiations. Because the FS and ROD are separated from the RI, the process can proceed while RI work on other source areas is ongoing. Similarly, RD work can occur at some source areas while

the RI is ongoing at others, providing a sense of progress to PRPs and the public. Under this approach data collection also is more easily focused and provides data that is directly usable in the RD for the site. Additionally, the Plug-In ROD ensures consistency with the NCP and preserves flexibility in the Superfund process while accelerating site cleanup.

ALTERNATIVE CONTRACTING FOR RAPID RESPONSE

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Region 10 has successfully implemented alternative contacting strategies and accomplished expedited cleanup activities using these strategies. The Region uses several alternative methods for both Removal and Remedial actions. These methods include the Region interacting with the USACE, the Superfund Innovative Technology Evaluation (SITE) program, and the blending of ARCS capabilities with emergency removal activities.

At the Allied Plating site, a pre-ROD Removal action was performed, completing the site cleanup significantly earlier than if the normal Superfund process were followed and at a lower cost. The Region entered into an IAG with the USACE to have its Rapid Response program contract and oversee the removal at the site due to a lack of capacity in the Region 10 ERCS contract. This was the Region's first experience with a USACE performed Fund-lead removal. In addition to carefully watching the technical process, the Region also compared the ERCS and USACE contractors' cost estimates. The Removal action was completed, finished under budget, and achieved the site remediation goals for the project. The Region plans to issue a Completed Action ROD, qualifying the site as a construction completion, followed by deletion from the NPL.

Following the completion of the RI at a battery recycling site in Alaska, the SITE program was contacted by a vendor requesting to demonstrate an innovative treatment technology designed to reduce the volume of lead contaminated soils. A technology demonstration plan was developed and implemented. As a result, the volume of contaminated soils was reduced, the soils were excavated and all soils remaining above the action level were treated and/or transported to a hazardous waste landfill. This pre-ROD activity completed the RA and saved a minimum of 12 to 18 months in comparison to the normal Superfund cleanup process. The proposed plan for this site was received favorably and a Completed Action ROD will be issued.

The Region also saved time and money on post-ROD activity at a site due to the combined teamwork and interaction of the ARCS and TAT contractors. Due to the limited availability of TAT resources, the Region retained the ARCS and TAT contractors from the same firm. The TAT team assisted in removal and sampling activities and the ARCS team provided the sampling procedure, final documentation of the cleanup, and the final report. The level of cooperation and information exchange was enhanced since the teams were from the same consulting firm. The contractors shared equipment and data, and interaction was simplified

by team members knowing each other and being familiar with each others work style. This practice has been used at only one site, however, the Region intends to use this "model" again if the opportunity arises.

PROPERTY VALUES AND LENDER LIABILITY OUTREACH ACTIVITIES

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The residents and business community in Tacoma, Washington expressed concerns regarding property values and liability for the cleanup costs of their property. To address these concerns, Region 10 held a Property Transactions Seminar and prepared a fact sheet entitled, "Informational Fact Sheet for Property Owners, Lenders, Brokers, Realtors, and Appraisers." These efforts helped reduce the tensions of property owners and lenders in the Tacoma area.

Region 10 joined with the Washington Department of Ecology, the City of Tacoma, and the Town of Ruston to sponsor the property transactions seminar for local realtors, appraisers, bankers, and lawyers. The seminar discussions and the panel dialogue provided an opportunity for Regional staff and local people to exchange ideas and concerns. Several good ideas were raised during the seminar; for example, the inclusion of mortgage insurance companies on the Region's mailing lists. The realtors, appraisers, and lenders also asked the Region for guidance on disclosure language that is consistent, concise, and legally protective, but does not unduly alarm buyers. The Region is working with the different groups that were present at the seminar to develop appropriate disclosure language. Following the seminar, the Region put together a four-page document explaining to the public the purpose of the seminar, the attendees, and a summary of the discussions.

The exchange of ideas and concerns, through the seminar and the fact sheets, helped the Region identify the major community concerns and target approaches to address them. In this case, education was effective in alleviating the fears of the affected community.