



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

APR 3 1992

OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSE

OSWER Directive 9200.3-01G

**MEMORANDUM**

**SUBJECT:** Correction of FY'92 Superfund Program Management Manual Definitions

**FROM:** Henry L. Longest II, Director  
Office of Emergency and Remedial Response (OS-200)

**TO:** Director, Waste Management Division  
Regions I, IV, V, VII  
Director, Emergency and Remedial Response Division  
Region II  
Director, Hazardous Waste Management Division  
Regions III, VI, VIII, IX  
Director, Hazardous Waste Division, Region X

**PURPOSE**

The purpose of this directive is to correct the "Definition of Accomplishment" for Remedial Design (RD) and Remedial Action (RA) Completions as defined in the FY'92 Superfund Program Management Manual, (OSWER Directive 9200.3-01F). Additionally, a site construction completion activity has been added in response to the program's emphasis on construction completions.

**BACKGROUND**

The ~~FY'92~~ **FY'92** Program Management Manual contains incorrect "Definitions of Accomplishment" for RD and RA completion. As the manual is ~~currently~~ written, Fund-lead RDs must be sent to the Headquarters Hazardous Site Control Division (HSCD) for concurrence before the Regions can receive credit as an accomplishment. To receive credit for either a first or subsequent RA completion, the Regional Administrator is required to sign an operable unit RA Report.

OSWER Directive 9320.2-3C, dated February 19, 1992, outlined new procedures for site completions. As a result of this directive, a new field has been added to track "construction completions."



## **OBJECTIVE**

This directive corrects the FY'92 Program Management Manual Definitions for an RD completion and a first or subsequent RA completion, effective for FY'92. This directive also includes the definition of a new field, "Site Construction Completion through Final RA."

## **IMPLEMENTATION**

The FY'92 Program Management Manual, page D-14 is corrected to read as follows:

**ACTIVITY:** RD Completions -- First and Subsequent (S/C-3)

**DEFINITION:** An RD is complete when the final plans and specifications and, in the case of a Fund-financed RD, a Fund-financed RA solicitation package for the selected remedy are completed.

### **DEFINITION OF ACCOMPLISHMENT:**

**Fund-financed** (Includes F and S lead events) - An RD completion is the date that EPA concurs with or approves and accepts the final plans, specifications and RA solicitation package.

**PRP-financed** (Includes MR, RP, and PS lead events) - No changes.

The Office of Emergency and Remedial Response has deleted the requirement that the Regions obtain HSCD concurrence prior to reporting the accomplishment for Fund-financed event RDs. HSCD remains available and willing to review RD plans and specification packages, regardless of the lead.

The FY'92 Program Management Manual, pages D-18 and D-19, is corrected to read as follows:

**ACTIVITY:** RA Completion - First and Subsequent (S/C-5)

**DEFINITION:** A first or subsequent RA is complete when construction activities are complete, a final inspection has been conducted, and an operable unit RA Report has been submitted to, and accepted, by EPA.

**DEFINITION OF ACCOMPLISHMENT:** The date the designated Regional Official (Superfund Branch Chief or above) signs a letter accepting the RA Report for the operable unit. The appropriate date must be recorded in CERCLIS with the event.

This change has been made because previous editions of the Superfund Program Management manual erroneously listed the Regional Administrator as the signature authority for a report that is not generated by EPA.

An explanation of procedures should help to clarify the reason for the change. Typically, when a RA operable unit is completed, pre-final and final inspections are held. These inspections are the formal way to ensure that the requirements under the RA contract have been fulfilled. Within 60 days of the final inspection, the contracting party for the RA (ARCS, USACE, State, PRP, etc.) submits a signed RA Report to document the completion of that specific remedial action. EPA formally accepts the report as satisfactory by sending a letter back to the contracting party. A Quick Reference Fact Sheet explaining the components of an acceptable RA Report is forthcoming.

To the FY'92 Program Management Manual, page D-19, the following activity is added:

**ACTIVITY: Site Construction Completion through Final RA**

**DEFINITION:** This measure is complete when construction activities for the final operable unit are complete, a pre-final inspection has been conducted, and a Preliminary Close Out Report has been prepared. This report summarizes site conditions, construction activities and, as appropriate, the schedule for the EPA/State joint inspection (required before the start of the operational and functional phase), approval of the O&M workplan, and the establishment of institutional controls.

**DEFINITION OF ACCOMPLISHMENT:** The date that the designated Regional Official (Division Director or above) signs the Preliminary Close Out Report documenting, based on a pre-final inspection, that physical construction is complete and only minor inspection/punch list items remain. The appropriate date must be recorded in CERCLIS with the event.

A field for this activity is not presently available in CERCLIS. Until the field is available, Regions should keep track of this subevent separately and add the data to CERCLIS later. The field should be available by September 30, 1992.

If you have any questions, please contact William Ross, HSCD, at FTS 678-8335 or Robin Richardson, OPM, at FTS 260-9367.

cc: B. Diamond, (OS-510)  
Information Management Coordinators, Regions I-X