



United States
Environmental Protection
Agency

Office of
Solid Waste and
Emergency Response

Publication 9203.1-051
December 1992

Status of Key SACM Program Management Issues — Interim Guidance

Office of Emergency and Remedial Response
Office of Waste Programs Enforcement
Office of Enforcement

Intermittent Bulletin
Volume 1 Number 1

The purpose of the Superfund Accelerated Cleanup Model (SACM) is to make Superfund cleanups more timely and efficient. This will be accomplished through more focus on the front end of the process and better integration of all Superfund program components. The approach involves:

- A continuous process for assessing site-specific conditions and the need for action;
- Cross-program coordination of response planning;
- Prompt risk reduction through early action (removal or remedial);
- Appropriate cleanup of long-term environmental problems;
- Early public notification and participation; and
- Early initiation of enforcement activities.

SACM is a process change that should be considered for all Superfund activities. Implementation of this policy will be consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Overall Superfund priorities remain the same: deal with the worst problems first; aggressively pursue enforcement; and involve the public and relevant State agencies at all appropriate stages of the work.

Status of Key SACM Program Management Issues - Interim Guidance

SACM raises a number of management-related issues which require reconsideration of the current ways Headquarters and Regions do business in budget planning and execution, reporting accomplishments, measuring performance, contracting, training, distribution of responsibility, and communications. This SACM Program Management Update will describe activities underway, planned, and recently completed to refocus Superfund's program management systems to support SACM implementation.

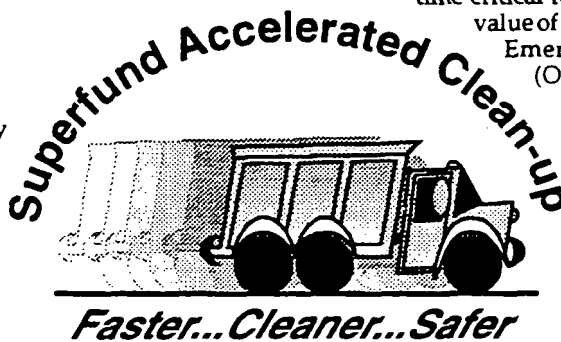
Regional Target (SCAP/STARS) Flexibility

To allow greater Regional flexibility in implementing Superfund site cleanups, SACM will require changes in the program's targets and measures under the Superfund Comprehensive Accomplishments Plan (SCAP) and the EPA Strategic Targeted Activities for Results System (STARS). FY93 program measures and targets were developed too early to incorporate key aspects of SACM. To prevent the FY93 STARS/SCAP measures from impeding the implementation of SACM,

the Office of Policy Planning and Evaluation (OPPE) approved an Office of Solid Waste and Emergency Response (OSWER) request to allow the program maximum flexibility to grant target relief.

Granting FY93 target relief requires the Regions to provide, on a case-by-case basis, a good resource-based rationale which clearly shows work commensurate with the targeted measure. For example, the Office of Waste Programs Enforcement (OWPE) has proposed to grant SCAP/STARS target relief for Remedial Design/Remedial Action (RD/RA) settlement where the Region implements a non-time-critical removal with an estimated clean-up value of greater than \$2 million. The Office of Emergency and Remedial Response (OERR) has proposed to grant target relief for remedial action starts where the Region conducts a large (>\$2 million) non-time-critical removal instead.

Headquarters and the Regions have started developing new FY94 SCAP/STARS measures. These new measures will reflect the program changes brought by SACM, and will provide the Regions greater flexibility to clean up "NPL-caliber" sites more efficiently. Headquarters will transmit a proposal of draft FY94 measures to the Regions



for review in January 1993. This package will be a basis for discussion during the Program Management meeting in February 1993. The intention is to complete a comprehensive revision of STARS/SCAP targets and measures so that SACM implementation is fully supported while reducing the total number of Regional targets.

National SACM Evaluation Measures

Baseline national criteria need to be established to analyze and evaluate the success of SACM in improving the timeliness and cost-effectiveness of Superfund cleanup actions. Existing Superfund time duration trend measures will be reevaluated to ensure they effectively document the program's baseline and capture incremental changes. Development of Superfund risk reduction measures is critical to the program's ability to report achievements of early action and long-term site cleanups. Existing Superfund environmental indicators will be the starting point for measuring risk reduction consistently for both early actions and long-term responses. These measures will allow us to identify the extent to which SACM projects and overall program changes linked to SACM implementation are measuring up to the overall objectives of SACM. These measures may also identify areas in which the SACM approach can be refined as full implementation proceeds in 1994.

In addition, there is a need to reach agreement on overall measures of program performance that will communicate meaningful program results to Superfund's customers. Ongoing communication initiatives are being reexamined to consider any refinements that are called for with the SACM program changes.

Workload Model

The workload models were frozen in FY91 and FY92, and are frozen for FY93. With SACM, there is a need to determine the future relationship between FTE workload/pricing factors and future program goals. To date, Headquarters' efforts have focused on generating a consensus on revising/reopening the Superfund workload models.

The Regions provided input on whether the models should be reopened. Six Regions favored reopening/revising the models, two proposed that a new, less resource intensive mechanism for distributing FTE be pursued, and two

opposed reopening/revising the models. The Regions also made two key recommendations: the models should not be reopened until FY95, and the family of Superfund models (program, enforcement, and Federal facilities) should be integrated.

In preparation for the February 1993 Program Management meeting, Headquarters plans to draft an approach for addressing the model changes based on the Regional and Headquarters correspondence to date. This proposal will be the point of departure for a break-out/discussion session during the meeting. The goal is to close the Program Management meeting with a joint approach to revising the Superfund workload models.

In addition, as was identified during the initial SACM planning meetings, it is critical that Regions evaluate their existing workforce skill mixes and identify cross-training and workforce development activities that are needed to effectively implement SACM.

Budget Flexibility

Beginning with the FY92 budget, Superfund monies have been apportioned between "Cleanup," "Enforcement," and "Support," with control subtotals for each category, and a narrow definition of cleanup. Regions need more flexibility in resource utilization than the budget process has provided to streamline and accelerate the cleanup of Superfund sites under SACM. One of the most critical areas involves the cleanup/support budget category. For FY94 OERR recast the Superfund Response budget, taking into account Sacm, in a way that considerably broadens the definition of cleanup.

Though the broader definition of cleanup was developed for the FY94 budget submission, it has been implemented in the FY93 enacted budget. A new advice of allowance (AOA) category has been added to the Cleanup category. The new AOA is site characterization; it includes all site assessment and remedial analysis (e.g., aerial photo, hydro-geo work) funding, and creates more Regional funding flexibility in these categories. This change significantly bolsters the Agency's ability to support the funding needs of the integrated assessments called for under SACM.

Greater flexibility among the various response activities is also needed. As an example, a Region that has planned a

remedial action at a given site and identifies an opportunity to more quickly reduce risks via an early action must have access to the funds required to implement this action. As such, the program has set aside \$50 million of the remedial action budget to encourage increased risk reduction at NPL sites through early action activities. The FY92 removal budget was successfully increased to support SACM early action projects. As new opportunities for flexibility present themselves we will continue to work with the OSWER senior budget officer, comptroller, and Office of Management and Budget (OMB) to further increase budget flexibility.

Program Priorities

Implementation of SACM requires that overall Superfund program priorities be reexamined. The *Superfund Program Management Manual* and *Agency Operating Guidance* are the key documents that lay out these integrated program priorities. The FY93 *Program Management Manual* was revised to incorporate FY93 SACM implementation activities into overall program priorities.

SACM has modified the way we think of the Superfund universe. Traditionally, sites were distinguished primarily by whether or not they were listed on the National Priorities List (NPL). EPA typically conducts only emergency and time-critical responses at non-NPL sites. EPA does not intend to alter significantly its traditional approach to addressing non-NPL sites not expected to qualify for listing.

In contrast, the program will seek to invest resources earlier in NPL-caliber sites to conduct integrated assessments and early actions. For sites currently on the NPL, EPA intends to take advantage of opportunities to conduct early actions and accelerate long-term responses. Thus, it may be useful to think of the Superfund universe under SACM as consisting of (1) non-NPL sites which EPA screens and takes needed emergency/time-critical actions; (2) NPL caliber sites where EPA conducts integrated assessments and early actions; and, (3) NPL sites where EPA conducts the full range of Superfund responses.

Analysis is underway to assess what actions will be needed to achieve the Superfund program's long-term goal of 650 NPL construction completions by the year 2000. This analysis should help to determine the ability of EPA and State

agencies to invest more resources into SACM integrated assessments and early actions at NPL-caliber sites without jeopardizing the NPL construction completion goal. Discussions during the February 1993 Program Management meeting will clarify program priorities and provide more specificity in appropriate resource investments and disinvestments to support SACM's implementation.

Federal Facilities

The Office of Federal Facilities Enforcement (OFFE) supports the focus on accelerated cleanup. OFFE, in conjunction with the Regions, has developed a draft guidance covering site assessment, impact of NPL listings, presumptive remedies, early actions vs. long-term actions, effect on existing Federal facility agreements, and Regional Decision Teams. The draft guidance is due out for final comment during the latter part of December and is expected to be final by February 1993.

OFFE has been working with the Superfund Revitalization Office (SRO) to communicate the Federal Facilities Accelerated Cleanup for Superfund (FFACS) policy and its Superfund impacts to the other Federal and State agencies.

OFFE will also be assessing the impacts of FFACS on SCAP/STARS targets and measures, workload model, and other program management issues.

Contracts

The Long-Term Contracting Strategy for Superfund (LTCS) was completed in September 1990. Implementation of the Strategy is ongoing. The Strategy analyzed the long-term contract needs of the Superfund Program and designed a portfolio of Superfund contracts to meet those needs over the next ten years.

Many of the underlying principles of SACM (e.g., increasing early action responses) were anticipated in activities under the LTCS (e.g., creating Emergency and Rapid Response Services (ERRS) contracts; combining site assessment and response technical assistance functions under a single Superfund Technical Assessment and Response Team (START) contract, etc.). Placement of new contracts has begun and will continue over the next several years. The LTCS itself and the scheduling of new procurements easily lend themselves to the phase-in of SACM.

Communicating Program Accomplishments

Considerable effort has been undertaken to communicate the goals/objectives, plans, and expectations for implementing SACM to other Federal and State agencies, other EPA Offices, critical external groups including Congress, environmental and trade groups, and others. We need to seek and incorporate feedback from these groups into our implementation efforts, and regularly communicate the program's progress to this audience.



NOTICE: The policies set out in this fact sheet are not final Agency action, but are intended solely as guidance. They are not intended, nor can they be relied upon, to create any rights enforceable by any party in litigation with the United States. EPA officials should follow the guidance provided in this fact sheet, or may act at variance with the guidance, based on an analysis of site-specific circumstances. The Agency also reserves the right to change this guidance at any time without public notice.

Status of Key SACM Program Management Issues - Interim Guidance

This paper is one of five fact sheets published by EPA under publication number 9203.1-05I (Volume 1, Numbers 1-5) to describe the Superfund Accelerated Cleanup Model (SACM) and should be reviewed in conjunction with the other SACM fact sheets. Regions are encouraged to contact the following individuals for information on program management issues: Dave Evans (703) 603-8885 in OERR; Tai-ming Chang (703) 603-8965 in OWPE (SCAP/STARS and contracts); David Chamberlin (202) 260-4118 in OWPE (workload model and budget); or Rene Wynn (202) 260-3025 in OFFE for further clarification, suggestions or comments.

There are two other important sources of information: "SACM concept paper" (8/5/92) and *Guidance on Implementation of the Superfund Accelerated Cleanup Model Under CERCLA and the NCP* [OSWER Directive No. 9203.1-03 (7/7/92)]. General SACM information can be obtained by calling the Superfund Document Center (202) 260-9760.