



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

JAN 28 1994

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Directive no. 9203.1-13

MEMORANDUM

SUBJECT: Expectations for Full Implementation of SACM

FROM: Henry L. Longest II, Director 
Office of Emergency and Remedial Response

Bruce Diamond, Director 
Office of Waste Programs Enforcement

TO: Addressees

Attached are our expectations for implementation of the Superfund Accelerated Cleanup Model (SACM). They have been jointly developed by Headquarters and the Regions. There are a few key points we would like to emphasize.

1. SACM is the usual way of doing business at Superfund sites. In Fiscal Years 1992 and 1993 we developed the SACM concept and applied the principles to various pilot projects and other sites where appropriate. Many of the pilot projects have concluded and some are still continuing this year. We have shared the results among ourselves and with outside interested parties through the mid-year and end of year pilot reports. We will continue to evaluate the results of the projects this year. The success of these shared experiences enable us to move forward with applying the SACM principles to all Superfund sites.

2. Regions should have an up-to-date site inventory and workplan. This is a two-step process. Regions should first establish an inventory of all known National Priorities List (NPL) and non-NPL sites. This inventory should include everything except for the "classic" emergencies that are unpredictable by nature. This inventory should be updated periodically. Regions should condense the inventory by culling out sites that need no Federal response. The remaining sites will be the basis for developing an annual workplan of sites on which to focus. When developing the workplan, Regions should work with the states and begin to identify sites appropriate for state lead. The Regional Decision Team (RDT) should use the inventory and workplan to ensure that the worst sites are given the highest priority. The Regions should use the most appropriate response authority to address each site (enforcement, removal, remedial, state lead).

3. Regions substantially reduce the Site Inspection Prioritization (SIP) backlog. As Regions form their workplans, it is important that decisions are made on sites that have received Preliminary Assessments and Site Inspections (PAs/SIs). Doing away with the backlog will allow us to better deal with sites as they come in the door.

On a number of occasions we have been asked about how reauthorization could impact SACM. Although the reauthorization proposal has been evolving over the past few months, there are clear indications that the fundamental SACM principles will be incorporated. It appears likely that the new law will allow for state program authorization. Working with the states while we establish the Regional inventories and workplans will put us in good standing for reauthorization.

We hope that this list of expectations will be helpful to you. This year is likely to be as challenging and demanding as ever. Good collaboration between Headquarters and Regions will be essential to overall success. In order to improve communications, we have established a single point of contact for SACM at Headquarters and fostered partnerships between the Headquarters Division Directors and Regional management. I urge you to talk to your Headquarters partner when questions or issues arise.

If you have questions on the expectations please contact your Headquarters SACM partner or Katie Daly, the Headquarters SACM Coordinator, at (703) 603-9026.

Attachment

Addressees

Waste Management Division Directors
Regions I, IV, V, VII
Emergency and Remedial Response Division Director
Region II
Hazardous Waste Management Division Directors
Regions III, VI, VIII, IX
Hazardous Waste Division Directors
Region X
Environmental Services Division Directors
Regions I, VI, VII
Superfund Branch Chiefs
Regions I-X
Superfund Removal Managers
Regions I-X
Superfund Branch Chiefs
Office of Regional Counsel
Regions I-X

cc: Elliott Laws, OSWER
Walt Kovalick, OSWER
Steve Herman, OE
Lisa K. Friedman, OGC
Tim Fields, SRO
Superfund Section Chiefs
All OERR, OWPE, and SRO Staff
Regional Information Management Coordinators
All Regional Superfund Staff

**EXPECTATIONS
FOR FULL IMPLEMENTATION OF SACM**

Universe of Sites

1. SACM is the way of doing business at Superfund sites.
2. **Develop Regional inventories and workplans.** In order to coordinate all response activities, each region will establish an up-to-date, consolidated inventory of all known, non-emergency sites (NPL and non-NPL). The regions will use this inventory to work with the states to develop and periodically up-date an integrated regional workplan that gives priority to the worst sites, both NPL and non-NPL, including Federal Facilities, and identifies sites appropriate for state lead. The Regional Decision Team will use the inventory and workplan to ensure that the worst sites are given highest priority and the most appropriate response authority (enforcement, removal, remedial, state-lead) is used. As always, "classic emergency" actions (requiring response within hours and days) will be taken when needed.
3. To ensure that the worst sites have been identified, Regions have significantly reduced the Site Inspection Prioritization (SIP) backlog and identified the appropriate action for each of the sites addressed.

Integrated Site Assessment

4. Integrated site assessments are routinely performed and incorporate early and long-term action considerations (Preliminary Assessment/removal assessment integration).
5. Information is shared with states to ensure they are applying SACM principles to the assessment activities they perform. When possible, states should prioritize sites or recommend decisions to EPA on sites.
6. Steps are taken during Expanded Site Inspections, when appropriate, to include data collection required for the Remedial Investigation.
7. Integrated site assessments specify data quality objectives (DQOs) that incorporate all significant data needs and issues for removal, site assessment, remedial, enforcement, community involvement, and environmental justice.
8. Field screening methods with appropriate QA requirements are used to streamline and expedite data collection as described by the Delivery of Analytical Services (DAS) strategy.

Maximize PRP Participation

9. There is substantial PRP participation in early actions.
10. Phased PRP searches are initiated as soon as a decision is made that a site requires a response. Because of variation in the timing of RDT involvement among regions, the decision date will be indicated by either an actual initiation of an early action or the Regional Decision Team date, whichever is earlier.
11. Constructive notice is provided to potentially interested parties through notices of availability of administrative record files and notices of public comment periods in major local newspapers.
12. General notice letters are issued prior to the start of the ESI/RI phase of the integrated assessment when appropriate.

Early Action and Long-Term Action

13. Early actions are performed at NPL and non-NPL sites to significantly reduce risk and expedite cleanup.
14. Presumptive remedies are used at appropriate sites.

Program Management

15. On-Scene Coordinators (OSCs), Remedial Project Managers (RPMs) and Site Assessment Managers (SAMs) routinely receive cross-training when appropriate.
16. SACM successes, lessons learned, and resource implications are documented, routinely shared with other Regions, Headquarters, and external audiences, and included in administrative improvements quarterly reports.
17. Regions and Headquarters fully participate in the Superfund Partnerships.
18. Headquarters continues to support Regions in implementing SACM.