



DIRECTIVE NUMBER: 9200.1-11

TITLE: Accessing the \$50 Million Set-Aside in the  
Remedial Action Budget for Quick Response at  
National Priorities List Sites

APPROVAL DATE: 2/20/92

EFFECTIVE DATE: 2/20/92

ORIGINATING OFFICE: OERR

FINAL

DRAFT

LEVEL OF DRAFT

A — Signed by AA or DAA

B — Signed by Office Director

C — Review & Comment

REFERENCE (other documents):

---

**OSWER OSWER OSWER**  
**DIRECTIVE DIRECTIVE**

---



United States Environmental Protection Agency  
Washington, DC 20460

# OSWER Directive Initiation Request

1 Directive Number  
9200.1-11

## 2. Originator Information

Name of Contact Person Tim Grier	Mail Code OS-210	Office OERR	Telephone Code 260-8110
-------------------------------------	---------------------	----------------	----------------------------

3. Title  
Accessing the \$50 Million Set-Aside in the Remedial Action Budget for Quick Response at National Priorities List Sites

4. Summary of Directive (include brief statement of purpose)  
This memorandum establishes the procedures required to access the \$50 million that has been set aside from the FY92 Remedial Action budget for quick response at National Priorities sites.

5. Keywords  
Site assessment and remediation

6a. Does This Directive Supersede Previous Directive(s)?  No  Yes What directive (number, title)

b. Does it Supplement Previous Directive(s)?  No  Yes What directive (number, title)

7 Draft Level  
 A - Signed by AA/DAA   
 B - Signed by Office Director   
 C - For Review & Comment   
 D - In Development

8. Document to be distributed to States by Headquarters?  Yes  No

This Request Meets OSWER Directives System Format Standards.

9. Signature of Lead Office Directives Coordinator <i>Bette Van Eyck</i>	Date
10. Name and Title of Approving Official	Date

EPA Form 1315-17 (Rev. 5-87) Previous editions are obsolete.

**OSWER                      OSWER                      OSWER                      O**  
**VE    DIRECTIVE                      DIRECTIVE                      DIRECTIVE**



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


FEB 20 1992

OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSE

OSWER Directive 9200.1-11

**MEMORANDUM**

**SUBJECT:** Accessing the \$50 Million Set-Aside in the Remedial Action Budget for Quick Response at National Priorities List Sites

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

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

**Purpose**

This memorandum establishes the procedures required to access the \$50 million that has been set aside from the FY 92 Remedial Action (RA) budget for quick response at National Priorities List (NPL) sites.

**Background**

In the months since the 30-Day Task Force Report, the program has looked at a number of strategies for accelerating cleanups. These have included strategies for identifying quick response opportunities in the NPL universe, expanding the contract vehicles available to carry out quick response actions, and initiating remedial action under a "thin" Record of Decision (ROD). Another option, which this directive implements, is to offer an incentive for initiating quick responses by setting aside \$50 million in the RA budget specifically for that type of work.

## Implementation

The \$50 million set-aside may be used to initiate rapid remedial responses or, when it is determined that removal authorities are more appropriate, the funds may be transferred to the removal account for removal actions. The funds may be transferred to the removal budget only if the percentage of the Region's budget devoted to NPL sites and the number of NPL removals conducted by the Region remains near or above historical levels. In other words the \$50 million is not intended to replace the removal funding which is currently projected for NPL site work. Each current removal advice of allowance gives the Region flexibility to address any immediate threats that may be discovered at NPL sites.

The \$50 million will only be set aside until the end of the third quarter of the fiscal year. Quick response projects need to be identified by that time in order to qualify for funding. After that time, unplanned and unobligated funds remaining in the quick response set-aside pool will revert to the RA budget and may be used to fund or supplement priority RAs or quick response projects identified after the third quarter.

During site planning and RI/FS phases, the Remedial Project Manager (RPM) should identify opportunities for quick response actions. Also, Removal Managers in the Regions have the responsibility to assess 50% of their non-Federal Facility proposed and final NPL sites each year to ensure that no immediate threats have arisen. The On-Scene Coordinators (OSCs) who perform these assessments should use them to identify opportunities for quick response.

Criteria to evaluate the potential for a quick response action include:

- The cleanup actions should be well defined, of low to moderate technical complexity, use a proven technology, have existing field information readily available, and have a low to moderate cost to complete. Examples are surface cleanup, soil excavation, volatile substance reduction, interim ground water plume controls, tank or structure demolition, and impoundment closure.
- Prior to initiating a quick response, enforcement issues need to be addressed.
- A project should not be broken up and expedited just to "turn dirt." The decision of a quick response should be based on an attempt to reduce risks and compress the critical path for pipeline remedial activities. The actions must be consistent and appropriate to the overall remediation of the site.

- Quick response projects generally should not cost more than \$2 million, however exceptions may be allowed for projects up to \$5 million.

A Region may request funding from the \$50 million by writing the Director of the Emergency Response Division (ERD). The ERD Director is responsible for coordinating with the Hazardous Site Control Division (HSCD), the Office of Program Management (OPM), and the Office of Waste Programs Enforcement (OWPE). The requests to the ERD Director should address the relevant criteria listed above justifying the need for the quick response. The request should be supported by relevant documents. If the quick response will be a rapid remedial response, Regions are encouraged to conduct a focused feasibility study that will lead to a "thin" ROD. The ROD must be signed and the State Superfund Contract in place prior to initiating the action. The funds must be obligated this fiscal year.

A separate determination needs to be made over which authority and contract vehicle will be employed to do the quick response. Several new Emergency Response Cleanup Services (ERCS) contracts have the capability and capacity to perform time-critical removal and rapid remedial responses. Under the remedial program, the Alternate Remedial Contract Strategy (ARCS) contractor performing RI/FS activities may conduct quick response actions. The ARCS contractor would normally subcontract for this type of work. EPA has also put in place a Prequalified Offerors Procurement Strategy (PQOPS) which is a list of contractors who are technically prequalified to perform mobile incineration and chemical fixation/stabilization. The U.S. Army Corps of Engineers has rapid response contracts for demolition actions, closures, point source contamination controls, and site stabilization available for use by EPA. Finally, separate site-specific contracts should also be considered.

### Conclusion

These procedures are intended to facilitate access to the \$50 million set aside from the FY 92 RA budget for quick response at National Priorities List (NPL) sites.

For further information regarding this memorandum contact Tim Grier of ERD at FTS 260-8110.

cc: SF Branch Chiefs, Regions I-X  
Removal Managers, Regions I-X  
OERR Office Directors  
Tim Fields, OSWER  
Sally Mansbach, OWPE