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TITLE:

Long Term Contracting Strategy for Superfund - Implementation Framework

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ORIGINATING OFFICE:

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☐ DRAFT

LEVEL OF DRAFT

☐ A — Signed by AA or DAA

☐ B — Signed by Office Director

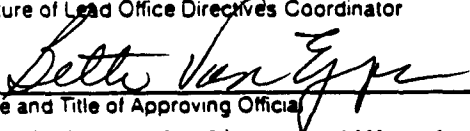
☐ C — Review & Comment

REFERENCE (other documents):

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Name of Contact Person Superfund Document Coordinator	Mail Code OS-245	Office OERR	Telephone Code (202) 260-9760	
3. Title Long Term Contracting Strategy for Superfund - Implementation Framework				
4. Summary of Directive (include brief statement of purpose) This document reflects the consensus of the Long-Term Contracting Strategy Task Force. The strategy details the portfolio of contracts to be used by the Superfund program over the next 10 years. The document outlines the approach and time frame for implementation.				
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10. Name and Title of Approving Official Henry L. Longest II, Director / Office of Emergency and Remedial Response	Date 07/12/91

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

DEC 17 1990

OSWER Directive 9242.6-09

MEMORANDUM

SUBJECT: Long-Term Contracting Strategy for Superfund--
Implementation Framework

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Purpose: We have attached the final Long-Term Contracting Strategy for Superfund Implementation Framework. This document reflects the consensus of the Long-Term Contracting Strategy Task Force.

Background: The final Long-Term Contracting Strategy was issued on September 9, 1990. The strategy details the portfolio of contracts to be used by the Superfund program over the next 10 years. The second important phase of the strategy is implementation. The attached document outlines the approach and timeframes for implementation. The Task Force anticipates that this approach will ensure an orderly transition to a decentralized contracting system without program disruption.

The implementation phase entails full planning for the phase-in of new contracts and monitoring the award and administration of these contracts. Several broad categories of issues were identified by the Task Force which will require extensive cross-programmatic and cross-organizational coordination. These issues are discussed in the attached document.

A result of the Task Force recommendations was the development of a structure consisting of three groups with distinct roles and responsibilities. These three groups will constitute the framework to manage and coordinate implementation efforts. The first group, the Advisory Committee, will coordinate and oversee overall implementation. The second group, the Designated Leads, will plan and oversee Regional administration of each strategy component. The third group, Regional Liaisons, will serve as the points of contact in each Region to facilitate implementation across Regional organizations. (A more detailed discussion of the roles and responsibilities of the three groups is contained in the attached paper.)

Objective: The implementation framework has been developed to ease the process of phasing-in the new contracting programs without disruption of Superfund activities.

Implementation: The framework will provide the structure for implementation and problem resolution of the Long-Term Contracting Strategy as the new programs are initiated over the next 5 years. Immediate actions are occurring to integrate site assessment activities into the interim use of the Alternative Remedial Contracting Strategy contracts and to integrate rapid remedial responses with time-critical removal activities.

Attachment

cc: Elaine Stanley, OWPE
Clem Rastatter, OPM
Larry Reed, HSED
Paul Nadeau, HSCD
Stephen Luftig, ERD
Mark Walker, PCMD
Long-Term Contracting Strategy Task Force

IMPLEMENTATION FRAMEWORK FOR LONG-TERM CONTRACTING STRATEGY
FOR
SUPERFUND

I. Introduction

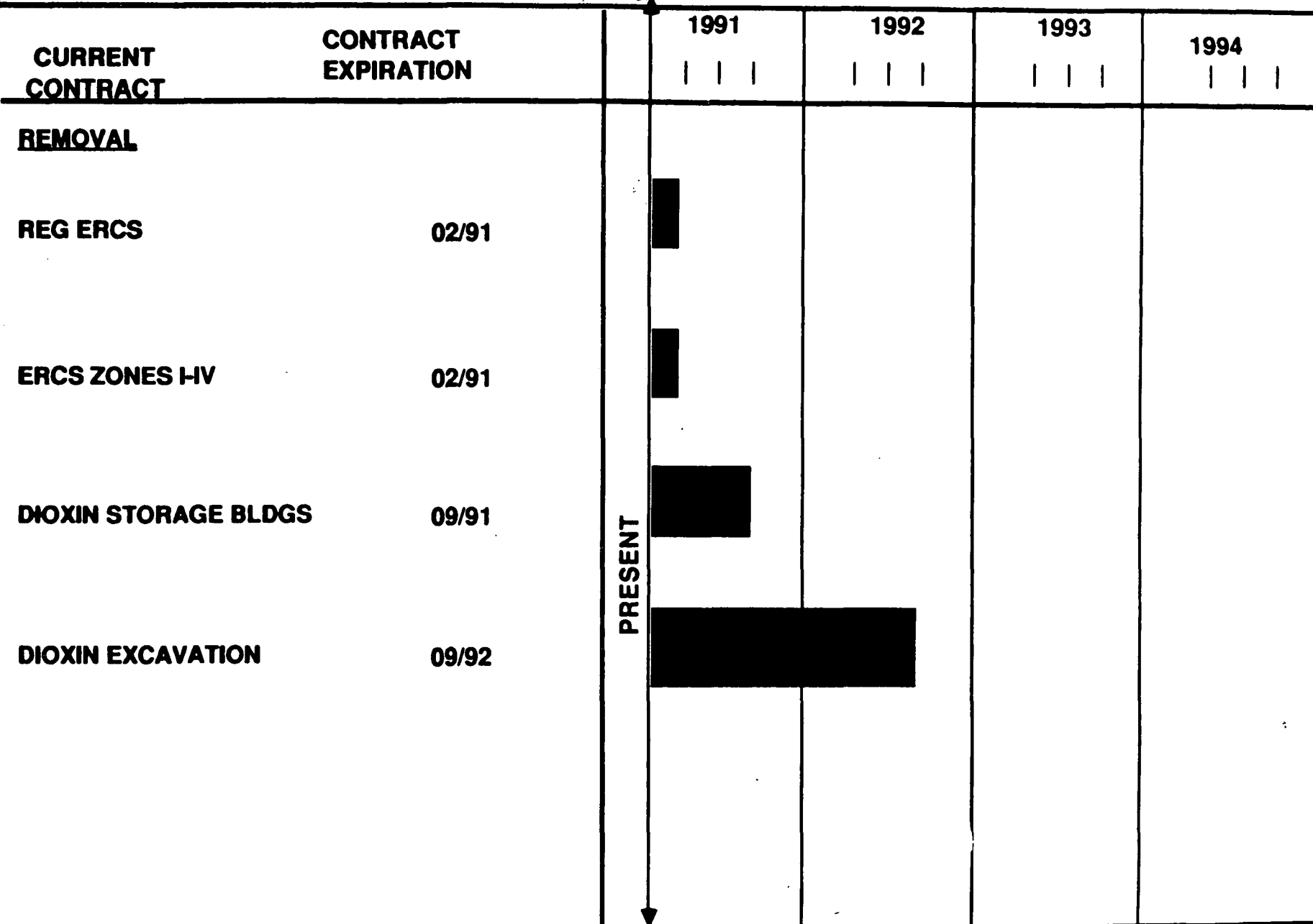
The Agency developed the Superfund Long-Term Contracting Strategy to design a portfolio of contracts to meet the needs of the program over the next decade. In analyzing those needs, several issues were highlighted. Among them were the needs for the following: program integration, streamlining project management by minimizing contractor handoffs, flexibility in responding to changing program priorities and budgets and enhanced competition. The Superfund program has 102 contracts supplemented by the Contract Laboratory Program. The current contracting program is a mixture of Headquarters and Regionally-managed contracts.

This plan provides a framework for implementing the Superfund Long-Term Contracting Strategy. Several major goals are addressed by the strategy. The majority of Superfund contracting programs will be decentralized to the Regions. Contracts will be smaller sized but contain options that may be exercised in response to fluctuating needs. The smaller contracts will allow new and smaller environmental firms to compete for Superfund work. Program activities will be integrated into the same contract component where functions are similar (e.g., time critical/rapid remedial response contracts.)

This implementation framework phases-in the new contracting components without disruption of current programs. As older contract vehicles expire, new components will gradually replace them over a 5-year period (see Table I.) This will allow time to prepare Regional personnel to receive the contracting responsibilities delegated in the strategy. In addition, gradual implementation provides Headquarters time to adapt its role to one of oversight and technical assistance .

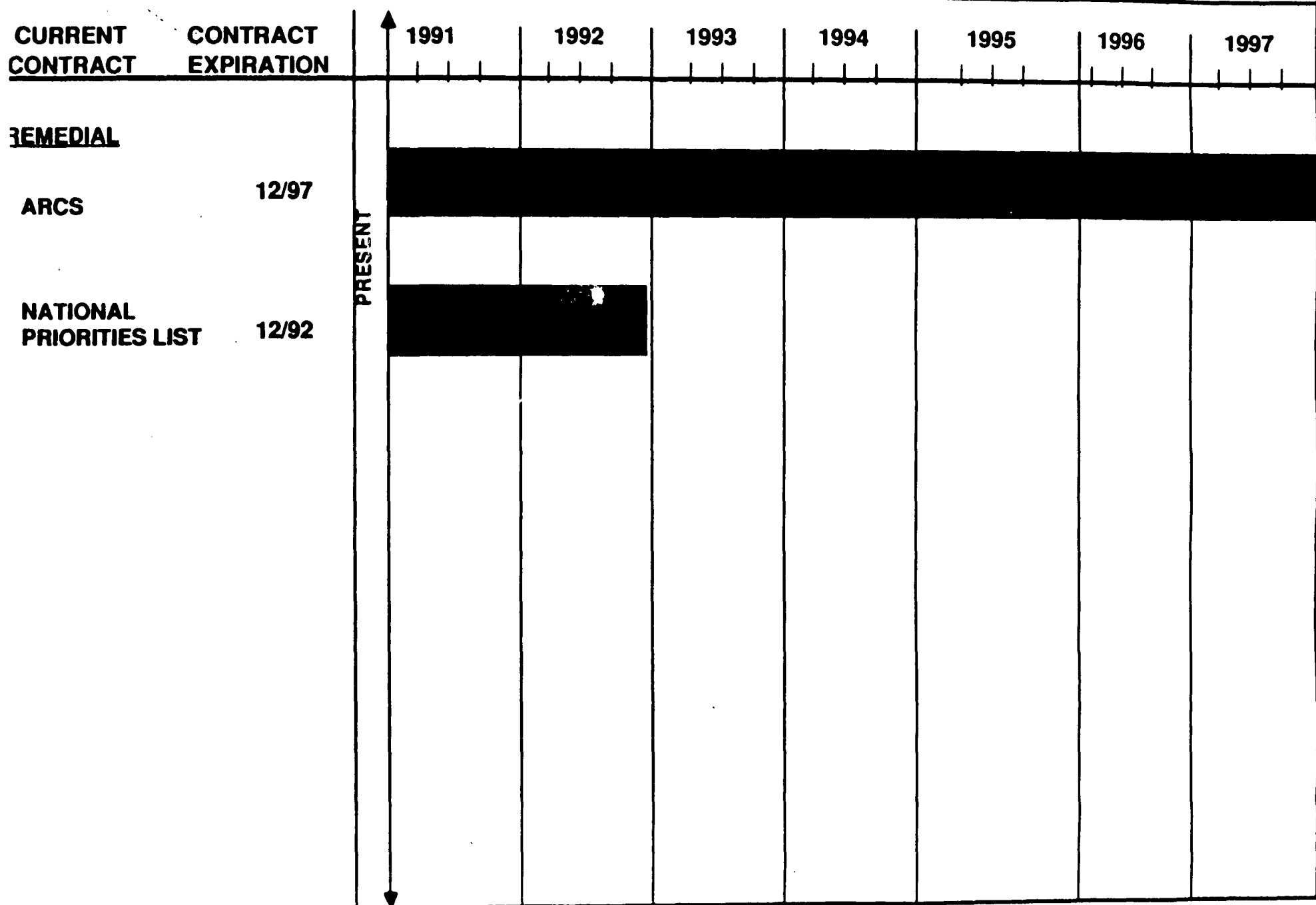
The Long-Term Contracting Strategy Task Force met to discuss and define a framework for strategy implementation and to identify key issues the plan should address. The task force also discussed methods for coordinating strategy implementation including the roles and responsibilities of the entities affected by the strategy. This implementation framework is the result of the task force's deliberations.

TIME TO IMPLEMENT STRATEGY COMPONENTS

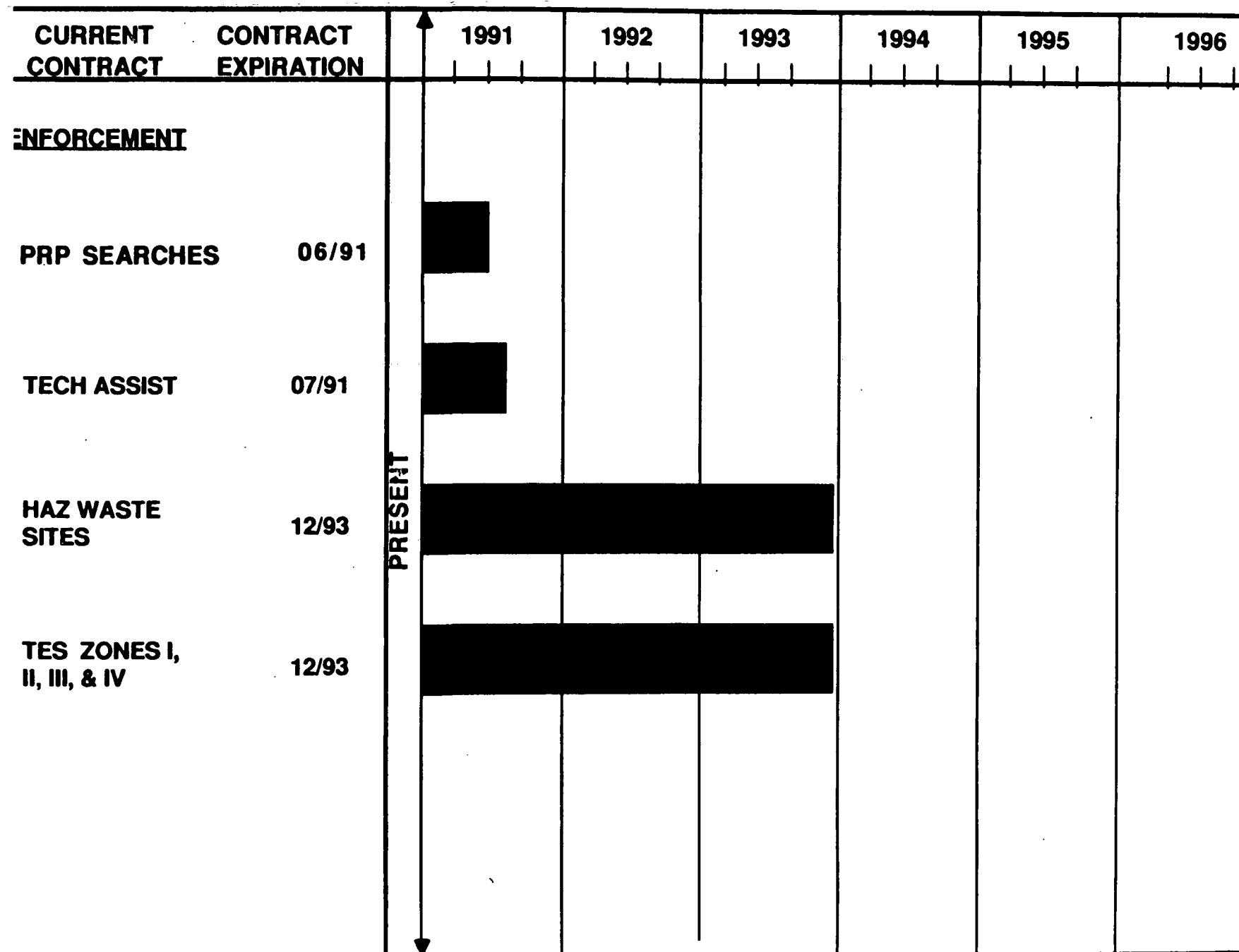


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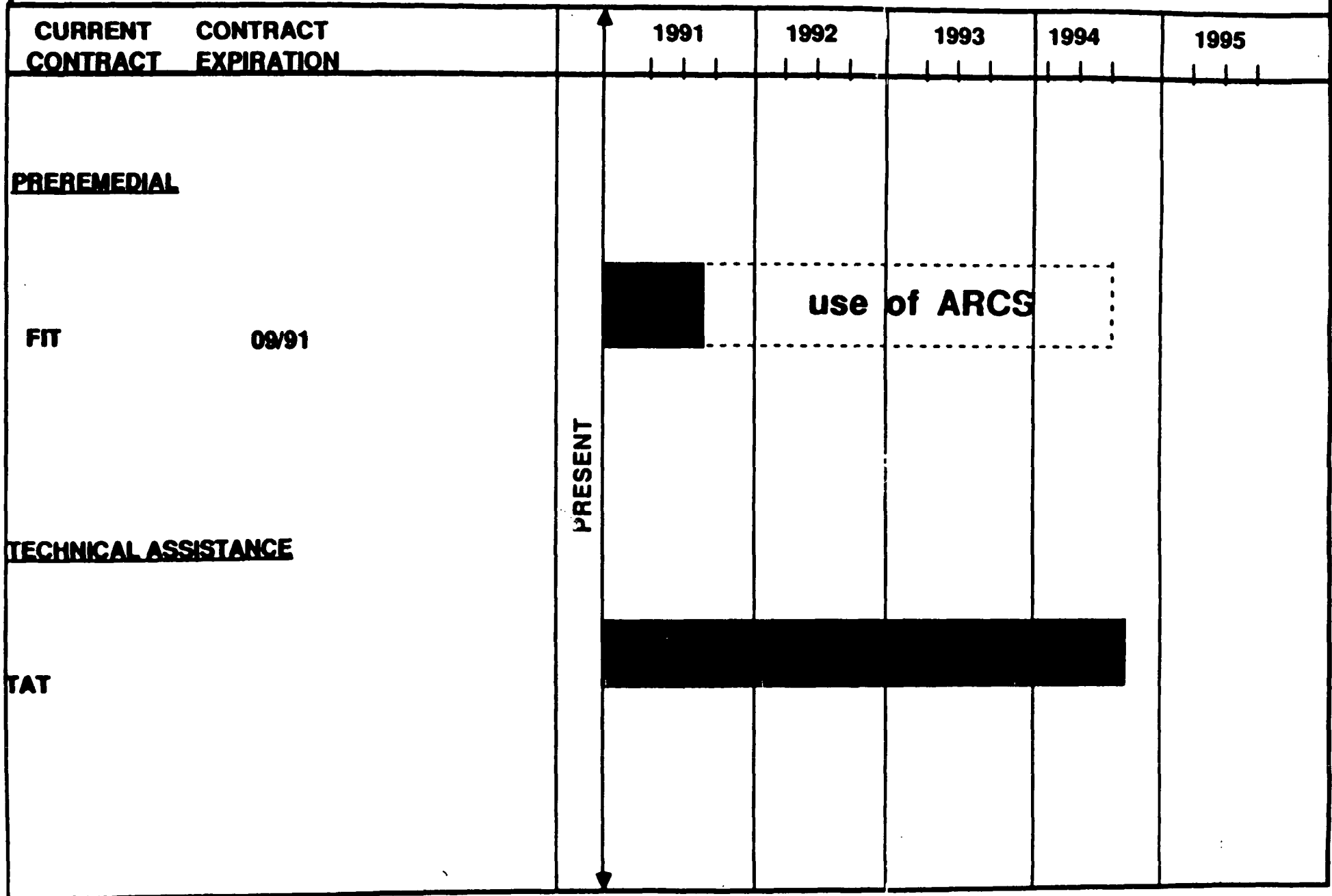
TIME TO IMPLEMENT STRATEGY COMPONENTS



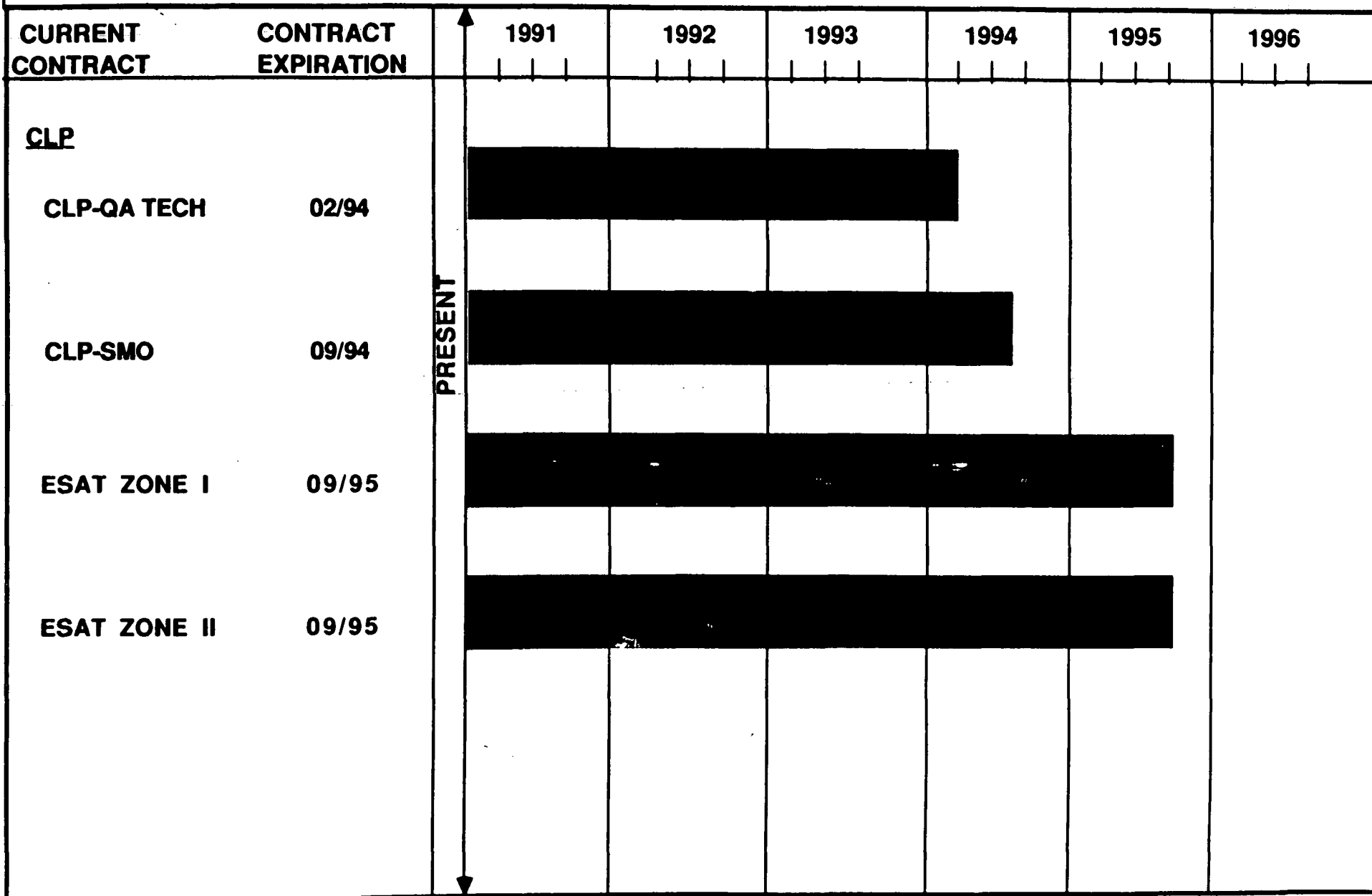
TIME TO IMPLEMENT STRATEGY COMPONENTS



TIME TO IMPLEMENT STRATEGY COMPONENTS



TIME TO IMPLEMENT STRATEGY COMPONENTS



II. Roles and Responsibilities

Implementation of the Long-Term Contracting Strategy will have broad, far-reaching effects on the Superfund program and the entities that carry out its mission. The task force believed that the key to successful strategy implementation was the development of a team structure to manage and coordinate the implementation effort.

The task force designed an implementation team to:

- Oversee the implementation process;
- Include all affected organizations;
- Exchange information;
- Ensure consistency with the strategy goals;
- Identify and resolve issues;
- Plan administration of strategy components;
- Facilitate Regional implementation; and
- Monitor progress and measure success.

The team structure consists of three groups with distinct roles and responsibilities (see attached Chart of Team Structure). The first group, the Advisory Committee, will coordinate and oversee overall implementation. The second group, the Designated Leads, will plan and oversee Regional administration of each strategy component. The third group, the Regional Liaisons, will serve as the points of contact in each Region to facilitate strategy implementation across Regional organizations. The roles and responsibilities are described in more detail below.

A. Advisory Committee

The Advisory Committee will include representatives of all affected organizations (the Emergency Response Division, the Hazardous Site Evaluation Division, the Hazardous Site Control Division, the Office of Waste Programs Enforcement, the Procurement and Contracts Management Division and the lead Regions for Superfund, Management, and Environmental Services Divisions). The representatives from the lead Regions will represent the Regions and communicate regularly with the Regional Liaisons. The Contract Operations Review and Assessment Staff (CORAS) will lead and facilitate the Advisory Committee (see attached Chart of Team Structure).

This broad-based membership will enable the Advisory Committee to build consensus on the overall focus and direction of strategy implementation. It will also enable the group to evaluate cross-programmatic issues and identify resolutions. As part

of its problem resolution role, the Advisory Committee will define the degree of Regional flexibility as well as define areas requiring consistency. A primary function of the Advisory Committee will be maintaining open lines of communication with upper management, the Designated Leads, and the Regional Liaisons. The level of long-term involvement in overseeing the new contracts will be evaluated by the committee. They will also oversee strategy implementation by reviewing the detailed implementation plans for each strategy component, developing measures of success, and tracking progress.

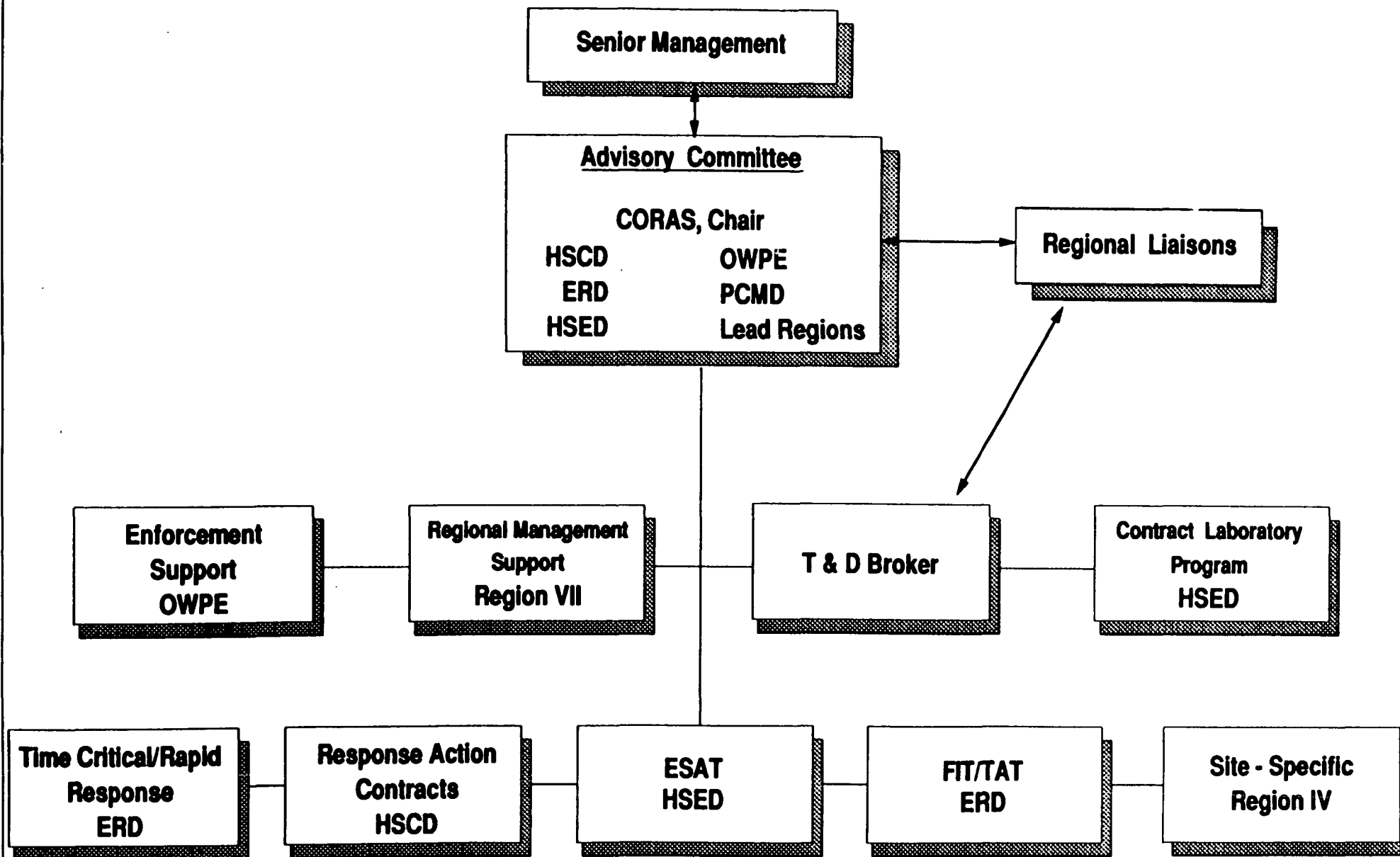
B. Designated Leads

Headquarters program Divisions and Regions will serve as Designated Leads for implementation activities (see attached Chart of Team Structure). The Designated Leads will plan and coordinate implementation of each strategy component by developing detailed implementation plans (discussed in Section IV). The Designated Leads will oversee and guide Regional execution of plans, providing technical assistance, monitoring progress, and recommending improvements. They will also play an important role in maintaining communication links with the Advisory Committee and the Regional Liaisons.

C. Regional Liaisons

Regional Liaisons will be appointed by each Region to serve as the points of contact for strategy implementation and coordination within the Region. A liaison will be appointed to represent the Superfund program, and an additional liaison will be appointed to represent the Management Division, in each Region. These representatives will be responsible for overseeing and coordinating Regional implementation to ensure consistency with the strategy. The Regional Liaisons will serve as the Region's communications link distributing and communicating progress to the Designated Leads and Advisory Committee. They will also ensure that Regional input on the detailed implementation plans is provided to the Designated Leads.

Implementation Organizational Structure



III. Key Considerations of Implementation Efforts

The Task Force identified eight major categories of implementation issues. These categories encompass issues whose resolution will detail the extent of flexibility available to the Regions and programs, and the need for consistency with the strategy goals. Each detailed implementation plan for the new contracting components of the strategy will address these categories of issues. As the Designated Leads identify the issues affecting their contracting components, some may require a broad-based resolution. The Leads are expected to analyze these issues for cross-programmatic implications and determine when the Advisory Committee will be needed for resolution.

In addition, the Task Force identified issues within the eight major categories which would be best resolved at the Advisory Committee level. The broad-based membership of the Advisory Committee is expected to yield cross-fertilization and consensus building. These issues will require extensive cross-programmatic and cross-divisional coordination and cooperation and quality assurance in their resolution. The Task Force anticipates that the Advisory Committee, Designated Leads and Regional Liaisons, as discussed in the previous section will become the framework for discussion and resolution of these issues during planning and implementation. In light of the strategy's objective of program integration, an unprecedented level of coordination will be required to ensure successful implementation of the strategy's final components.

This section discusses the topics identified as the eight major categories of issues which must be evaluated by the Designated Leads and the Advisory Committee.

Category 1 - Communications

One of the key issues identified by the Task Force which affects all components of the strategy was communications. Each strategy component must be concerned that communications are effective and that deliberations and decisions by the Designated Leads represent consensus of affected entities. The links between Headquarters and the Regions in both procuring and overseeing these contracts must be clearly established and regularly used. The methods of communication and information sharing must be defined in the detailed implementation plans. Progress should be regularly reported by Designated Leads and Regional Liaisons to the Advisory Committee.

The Advisory Committee's membership will promote free and open communications among affected organizations. Communications on overall strategy implementation direction and progress will be a key topic considered by the Advisory Committee. In addition, information transfer will be a theme of the Advisory Committee efforts.

Category 2 - Organizational Roles and Responsibilities

The shifting of the Headquarters roles to oversight and monitoring will require analyses and recommendations from the Advisory Committee. The role of Headquarters during the transition period will require careful definition. Initially assistance will be provided to the Regions by both the contracts offices and program offices to ensure that activities are carefully coordinated and that Regions are well prepared to accept their new responsibilities. Well-managed and interactive control mechanisms will need to be developed so that the transition can be accomplished smoothly. For example, efforts should be made to provide model Statements of Work, assistance on technical evaluation criteria, fee plans, etc. to ensure consistency and ease of transition. Program offices will need to coordinate closely with contracts personnel on the types, kinds and numbers of contracts to support their needs. In addition, extensive cross-programmatic, cross-divisional coordination efforts will be required to develop integrated contracting components (e.g. FIT/TAT.) Designated Leads of contracting components will undertake responsibility to elicit participation of other divisions and programs involved in these components. Provisions also should be evaluated regarding Regional access to one another's contracts for crossover in cases of conflict of interest, poor performance and insufficient capacity.

Category 3 - Individual Roles and Responsibilities

The Task Force also raised the issue of individual roles and responsibilities. With the transfer of contract management responsibility from headquarters to Regions, many areas of coordination must be addressed (e.g., finance, legal, systems). Cross-cutting issues concerning roles and responsibilities involved the definition of contracting officer (CO) and project officer (PO) roles and authorities. Some questions for consideration include: Will contracts be procured in the Regions initially or at Headquarters? How will Regional COs and POs interact? How will administrative, legal and financial monitoring support be provided to POs and COs? The Advisory Committee will review the general transition of contracting and project officer responsibilities to the Regions. In addition, the Designated Leads will need to consider program-specific issues on roles and responsibilities such as issuance of technical direction documents and work assignments, fee determinations, performance evaluations, subcontracting consent and warrant authorities. The Designated Leads will inform the Advisory Committee of their recommendations on these issues and use the Advisory Committee mechanism to ensure coordination and consistency on their resolutions.

Category 4 - Timing of Transition and Delegation of Responsibilities

A primary goal of strategy implementation is to avoid program disruption by phasing in new contract mechanisms as the old expire. Preliminary timelines for implementation of the new contract mechanisms are discussed in Section IV--Individual Strategy Components. The detailed implementation plans will ensure that a smooth transition of responsibilities occurs. They will also address the timing and delegation of placement and administration responsibilities to the Regions. These recommendations

will be carefully coordinated with the Advisory Committee who will oversee the general issues of delegation timing so that Regions will be prepared to assume the responsibilities.

Category 5 - Training

A key issue to be addressed for each strategy component will be the preparation of the Regions to receive technical PO and contracting responsibilities. Cross-programmatic training issues (e.g., RPM access to Time Critical/Rapid Response Contracts) will be addressed through recommendations relating to OSC and RPM training. These recommendations will be considered by the Advisory Committee.

Category 6 - Budget/FTE

A key issue of implementation will be the evaluation of the budget and personnel resources. The Designated Leads will recommend budget allocation scenarios to fund new Regional contracts for each strategy component. The Advisory Committee will provide oversight on general budget issues to ensure consistency with the analysis performed in the Long-Term Strategy on personnel resources and funding of contracts. In addition, the Advisory Committee will coordinate personnel and resource issues with the affected budget offices.

Category 7 - Policy, Guidance and Procedures

The Designated Leads will be responsible for identifying needed policy, guidance and procedures modifications resulting from the new contracting mechanisms. Types of procedural issues to be considered by the Designated Leads will likely include: model statements of work, fee determinations, performance evaluations, contractor monitoring requirements, etc. The Advisory Committee will provide recommendations on cross-programmatic and broad policy issues involving extent of Regional flexibility and national consistency requirements (e.g., consistency of award fee process).

Category 8 - Automated Information & Reporting Systems

A key cross-cutting issue identified by the task force will be the development of consistent information and reporting systems for all the strategy components. The Designated Leads for each individual contracting component will address the needs for information systems within their detailed implementation plans. The Advisory Committee will evaluate the individual component's needs and identify the means to address those needs in a coordinated and systematic way. The Advisory Committee will need to evaluate a number of associated issues: 1) identifying the types of information Headquarters will need to fulfill its oversight role; 2) identifying information needs within and across Regions; 3) establishing common data elements; 4) linking new and existing data systems. The Advisory Committee will also have to coordinate this effort with PCMD's planned Integrated Contracting Management System.

IV. Individual Strategy Components

The Designated Leads will be responsible for developing detailed plans and coordinating the implementation of each strategy component. The Advisory Committee will provide general guidance to the Designated Leads in preparing their plans and in considering cross-cutting issues. Each of the detailed implementation plans will address the eight major categories of issues identified in Section III. Some key elements of detailed implementation plans may include:

- 1) Methods for obtaining input from all affected organizations;
- 2) Resources to be committed to the implementation process;
- 3) Key milestones such as preparation of procurement packages, model statements of work, issuance of RFPs, and methods for technical evaluation, etc.;
- 4) A timeline for implementation outlining dates for major milestones;
- 5) Methods for monitoring implementation and reporting accomplishments and problems to the Advisory Committee.

Inclusion of additional elements may also be necessary depending on the requirements of the individual contracting program. This section describes the current state, strategy goal, potential implementation issues, plan due date and designated lead for each of the strategy components.

Time Critical/Rapid Response

Designated Lead

The Emergency Response Division is the Designated Lead for this component.

Current State

Currently all removal cleanups services and emergency response services are provided by the Emergency Response Cleanup Services Contracts (ERCS). Four zone ERCS contracts provide emergency response and cleanup services, nationwide, within 2 to 24 hours. Additionally, Regions II, III, IV, and V have Regional ERCS contracts that provide cleanup services within 24 to 48 hours. Cleanup services for rapid remedial actions are only available through the U.S. Army Corps of Engineers Rapid Response and Preplaced contracts.

Strategy Goal

The strategy integrates rapid response cleanup services for the removal and remedial programs by creating one contract mechanisms, in each Region, that can be accessed by both programs. These new contract mechanisms enhance flexibility to be completed under the remedial program without handoffs among various contractors.

Implementation Timeline

The first contracts to be affected by the strategy will be the ERCS contracts for Zones 2 and 1. Which expire in June and July 1991 respectively. The Zone 3 ERCS contract expires in September 1991. The Zone 4 ERCS has recently been recompeted as two contracts to be awarded prior to February 1991. Zone 4A and 4B will not include rapid remedial response. It will be phased-in at a later date. Coordination on these issues must begin immediately.

Potential Implementation Issues to be Considered





- o Statement of work for the new contract mechanisms to include rapid response cleanup services for both the remedial and removal programs
- o A modification of the current ERCS statements of work
- o On-Scene Coordinators have limited contracting officer authority to issue delivery orders for cleanup services up to \$250,000 and provide on-scene supervision of the contractor
- o Remedial Project Managers (RPMs) do not have authority to issue delivery orders, nor are they trained to do on-scene supervision

- o New contract mechanisms to incorporate procedures for RPMs to access the new contracts
- o Time Critical/Rapid Response the first to be implemented because of the near term expiration dates for the current ERCS Zones 1 and 2 contracts

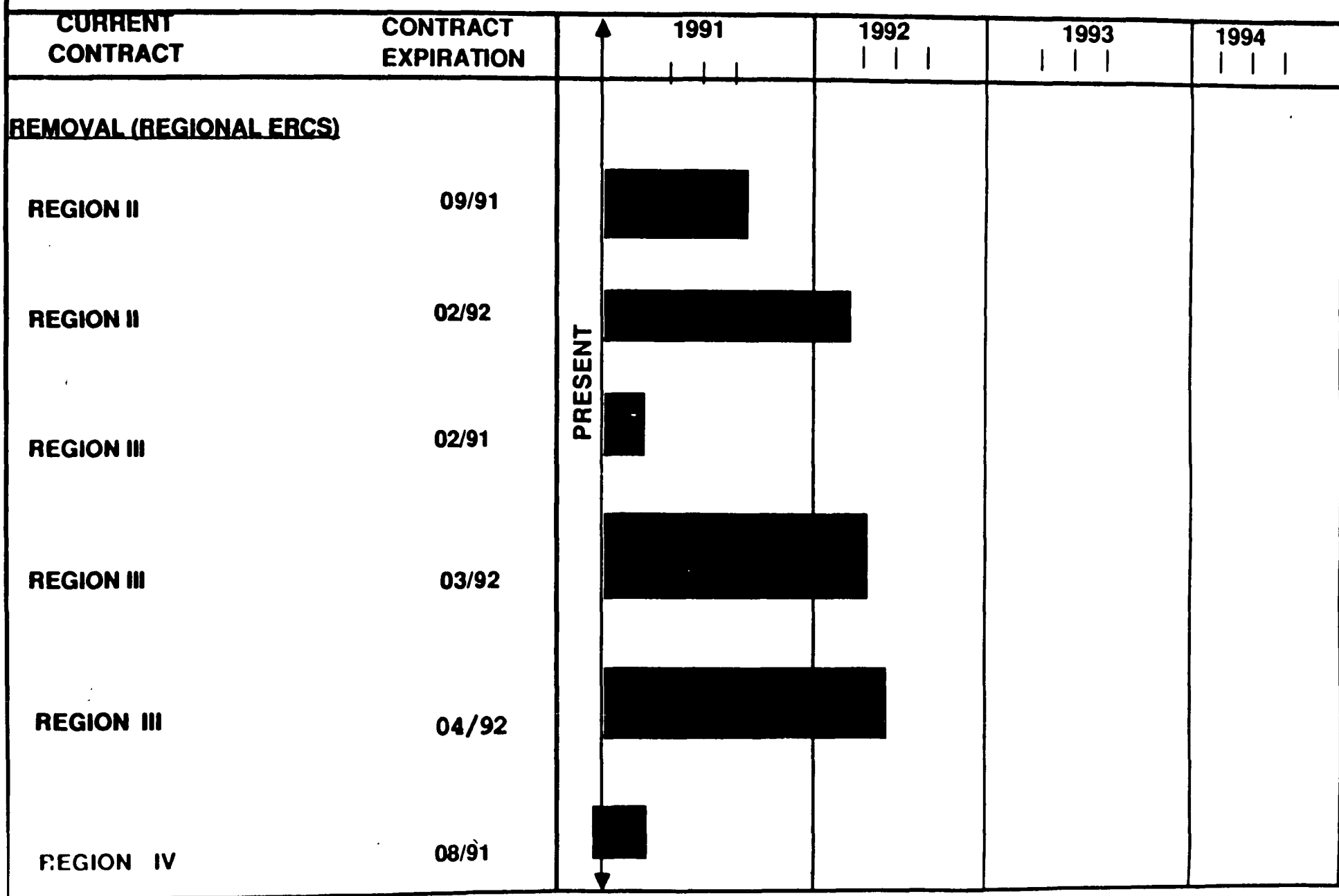
Detailed Plans

Due Date for Detailed Implementation Plan: January 1991

TIME TO IMPLEMENT STRATEGY COMPONENTS

CURRENT CONTRACT	CONTRACT EXPIRATION		1991	1992	1993	1994
<u>REMOVAL (ERCS)</u>		PRESENT		ERCS 4A & 4B		
	ZONE II					
	ZONE I					
	ZONE III					

TIME TO IMPLEMENT STRATEGY COMPONENTS



TIME TO IMPLEMENT STRATEGY COMPONENTS

CURRENT CONTRACT	CONTRACT EXPIRATION		1991 	1992 	1993 	1994
REMOVAL		PRESENT				
DIOXIN STORAGE BLDGS.	09/91					
DIOXIN EXCAVATION	09/92					

Environmental Services Assistance Team

Designated Lead

The Analytical Operations Branch of the Hazardous Site Evaluation Division is the Designated Lead for this component.

Current State

Currently, analytical support and data review services are provided by dedicated team contracts in two zones. These Environmental Services Assistance Teams (ESAT) contracts are managed by EPA Headquarters.

Strategy Goal

The strategy continues the dedicated team concept but individual ESAT contracts will managed by each Region. Creation of smaller, regionally-based contracts will enhance competition.

Implementation Timeline

The current ESAT contracts expire in July and September 1991 and are undergoing recompetition. The Regional ESATs are expected to be phased in within 4 years of the new contract expiration dates.

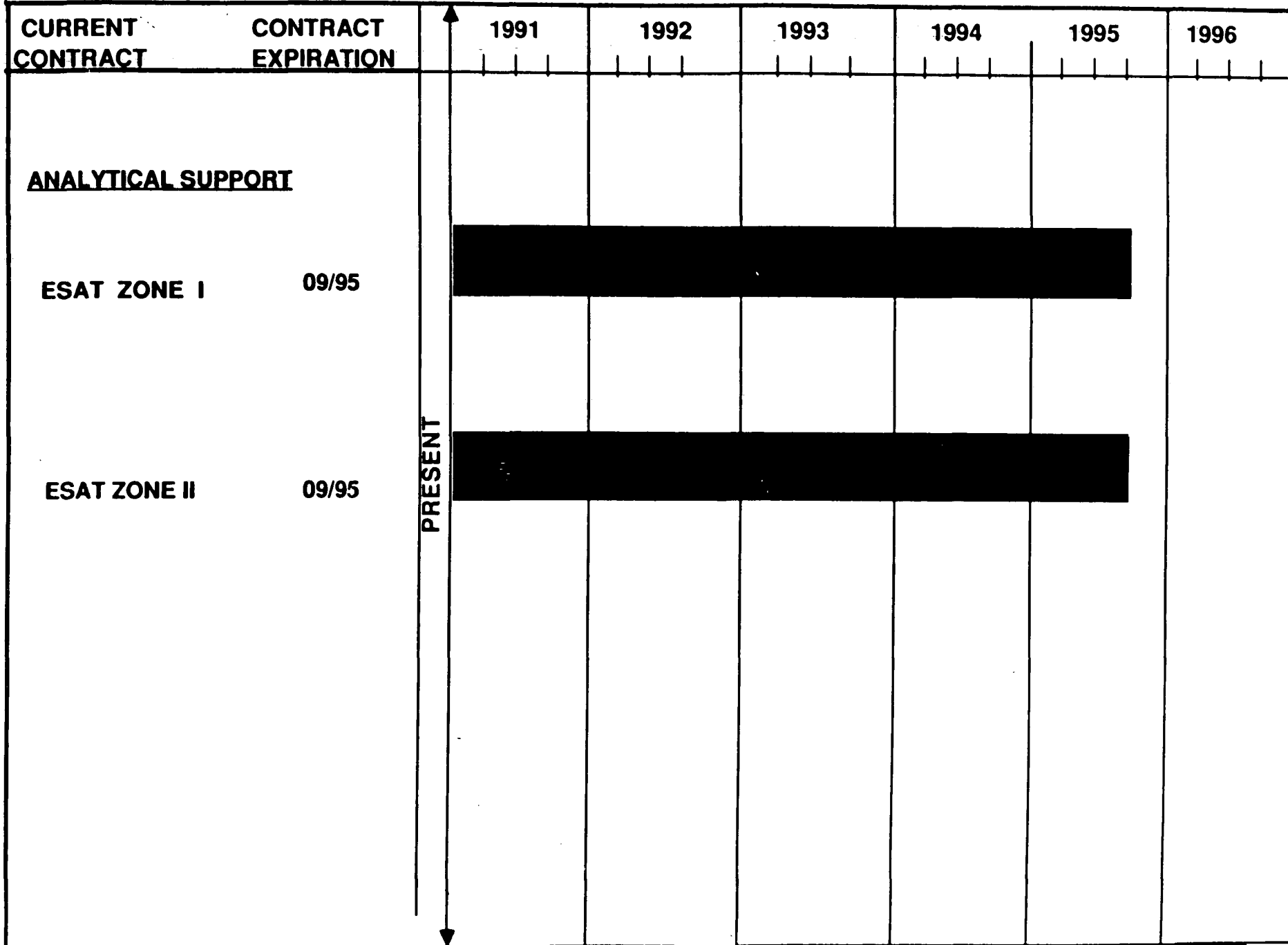
Potential Implementation Issues to be Considered

- o Procedures for allocating funds to compete and manage the Region ESATs.
- o Plan to manage the procurement process (e.g., model SOW, fee plans, etc.)
- o Capacity issues linked to CLP issues
- o Infrastructure and award fee issues including personnel resources

Detailed Plans

Due Date for detailed Implementation Plan: February 1991

TIME TO IMPLEMENT STRATEGY COMPONENTS



Field Investigation Team/Technical Assistance Team (FIT/TAT)

Designated Lead

The Hazardous Site Evaluation Division is the Designated Lead for the ARCS/FIT portion and ERD is the lead for the FIT/TAT portion of the component.

Current State

Currently, preremedial support services are provided by dedicated team contracts in two Headquarters managed zones. Removal technical assistance is also provided by dedicated team contracts in two Headquarters managed zones.

Strategy Goal

The strategy will combine the FIT and TAT services into small, regionally-managed, dedicated team contracts. Until an orderly transition can occur, the ARCS contracts will be used to provide preremedial support.

Implementation Timeline

The FIT zone contracts expire in October 1991. Preremedial support must be fully phased into the ARCS contract mechanisms by that date. Coordination on these issues must be immediately initiated.

The current TAT zone contracts expire October 1994. The FIT/TAT Regional Contracts must be implemented by that date.

Potential Implementation Issues to be Considered

- Procedural changes to be implemented to provide preremedial support through the ARCS contracts
- o Process to evaluate preremedial support within the existing ARCS evaluation process
 - o Administrative procedures associated with the FIT contracts to be adapted to the ARCS processes (e.g., program management costs, site-specific invoicing)
 - o Regional team structures for the combined FIT/TAT contracts
 - o Model SOWs and other elements of the procurement packages.
 - o Procedures for allocating funds to the Regions for competing and managing the FIT/TAT contracts

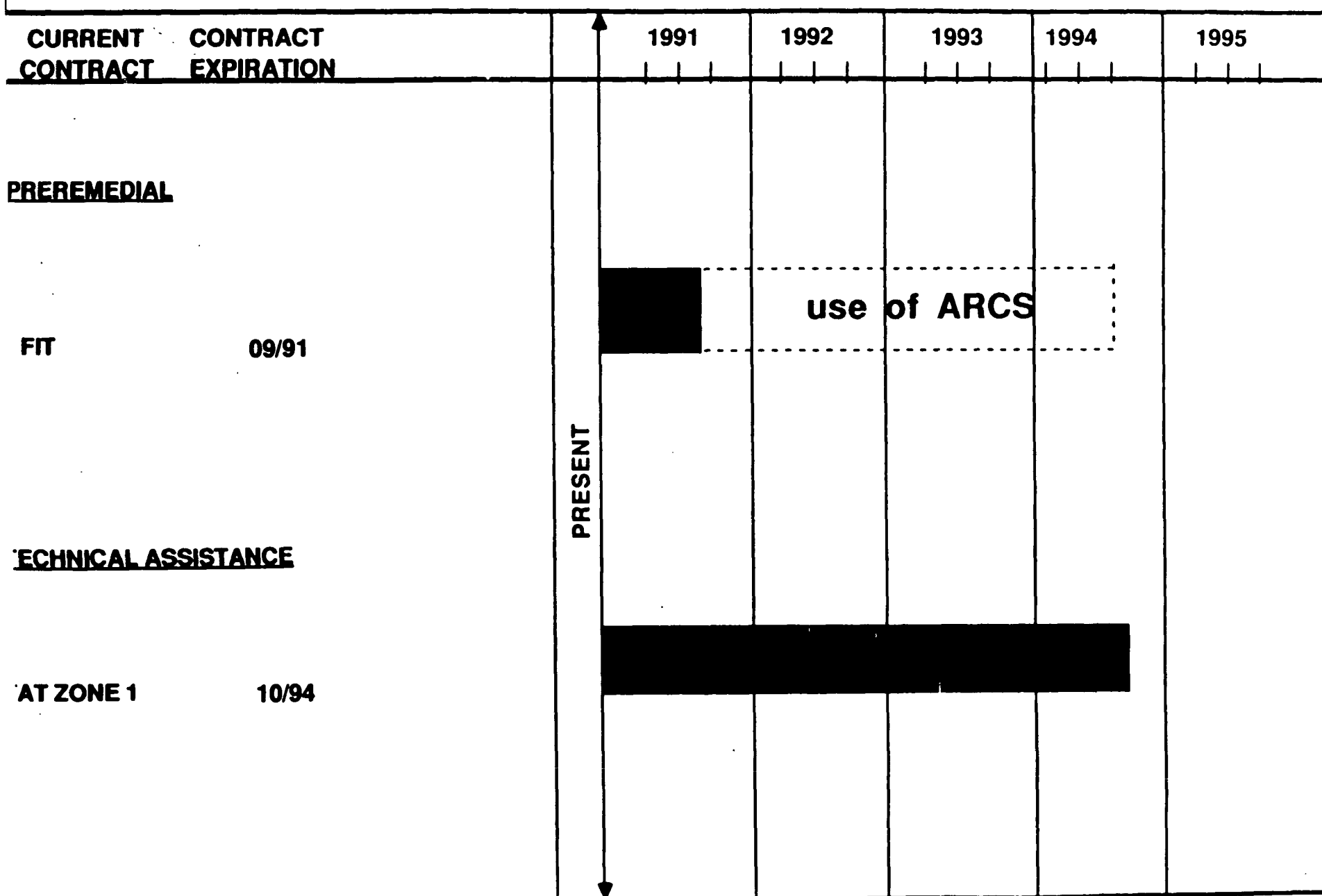
Detailed Plan

Due Date for Detailed Implementation Plan:

Interim FIT/ARCS: submitted

Long-term FIT/TAT: April 1991

TIME TO IMPLEMENT STRATEGY COMPONENTS



Response Action Contractors

Designated Lead

The Hazardous Site Control Division is the designated lead for this component. The Office of Waste Programs Enforcement and the Emergency Response Division will serve as leads for their programmatic issues arising under this component.

Current State

Currently, 45 Regionally-managed Alternative Remedial Contracting Strategy (ARCS) contracts provide support for federal-lead remedial activities except remedial actions. ARCS contracts also support selected enforcement oversight activities.

Strategy Goal

The strategy integrates all enforcement oversight activities into the current ARCS contracts, and adds support for nontime-critical removals to the scope of contract activities. Integration of remedial and all enforcement oversight activities will reduce handoffs among contractors when actions change from fund-lead to responsible party-lead. Inclusion of all enforcement oversight activities will increase use of existing ARCS capacity. Until an orderly transition to a combined FIT/TAT contract program occurs, preremedial support will be provided through the ARCS contracts (see FIT/TAT discussion.)

Implementation Timeline

The ARCS contracts begin to expire in 1998. The transfer of all enforcement oversight activities to the ARCS contracts will occur in December 1993 with expiration of the Technical Enforcement support (TES) zone contracts. Integration of nontime-critical removal actions with ARCS will begin in June 1991 as the ERCS Contracts expire.

Potential Implementation Issues to be Considered

- o Procedures for short-term integration of preremedial support with ARCS (see FIT/TAT discussion -- Hazardous Site Evaluation Division will serve as the Designated Lead.)
- o Resolve the issues of switching between fund and enforcement-lead, potential conflicts of interest, phase-in of enforcement oversight
- o Issue of removal program access to ARCS contracts for nontime-critical removals

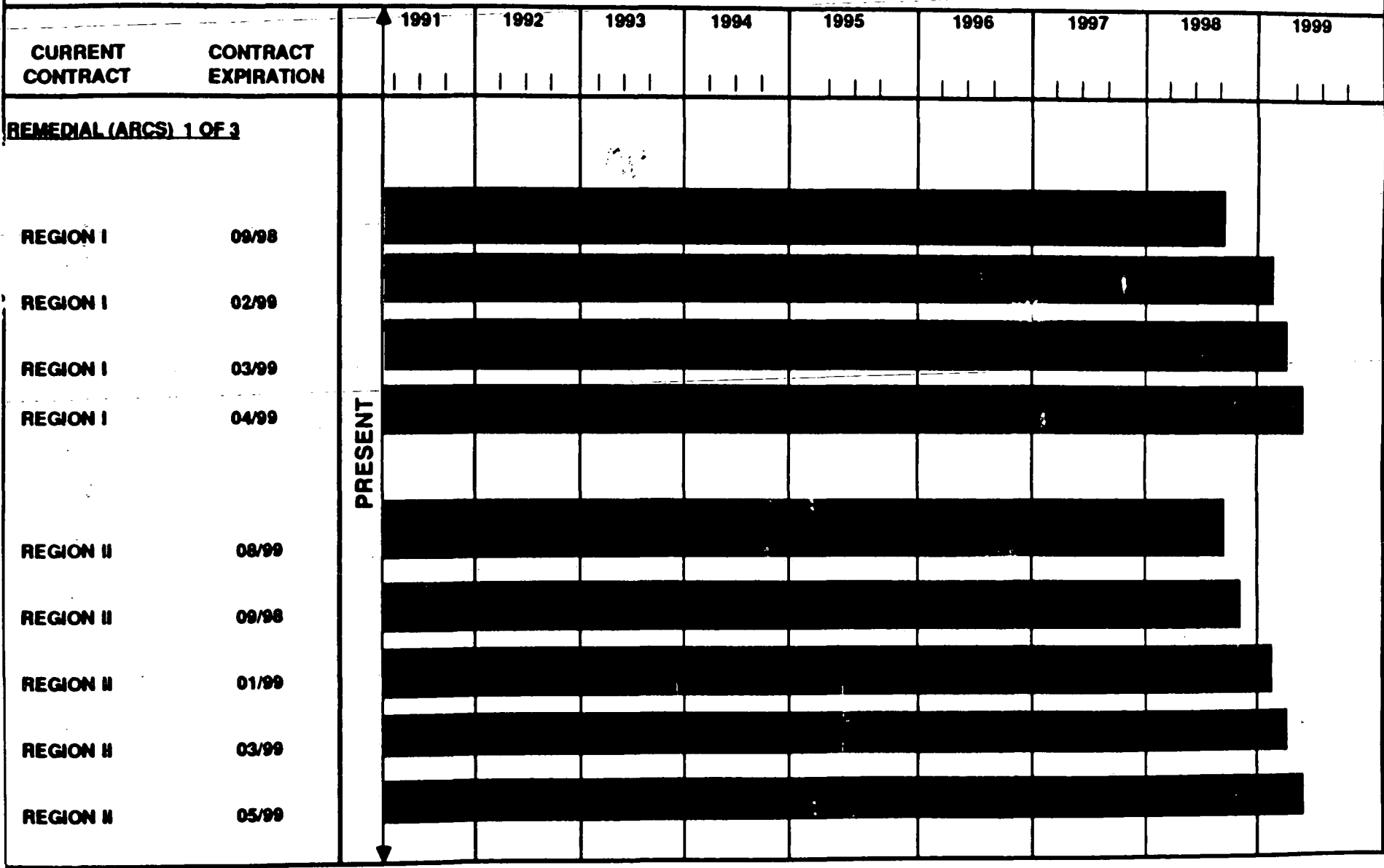
Detailed Plans

Due Date for Detailed Implementation Plan: February 1991 for removal programmatic issues (ERD). Hazardous Site Control Division must develop procedures for accessing for nontime-critical removals by May of 1991 due to the first expiration date of ERCS in June of 1991.

April 1991 for enforcement oversight programmatic issues (OWPE). Hazardous Site Control Division must develop procedures for all oversight functions based on the OWPE plan.

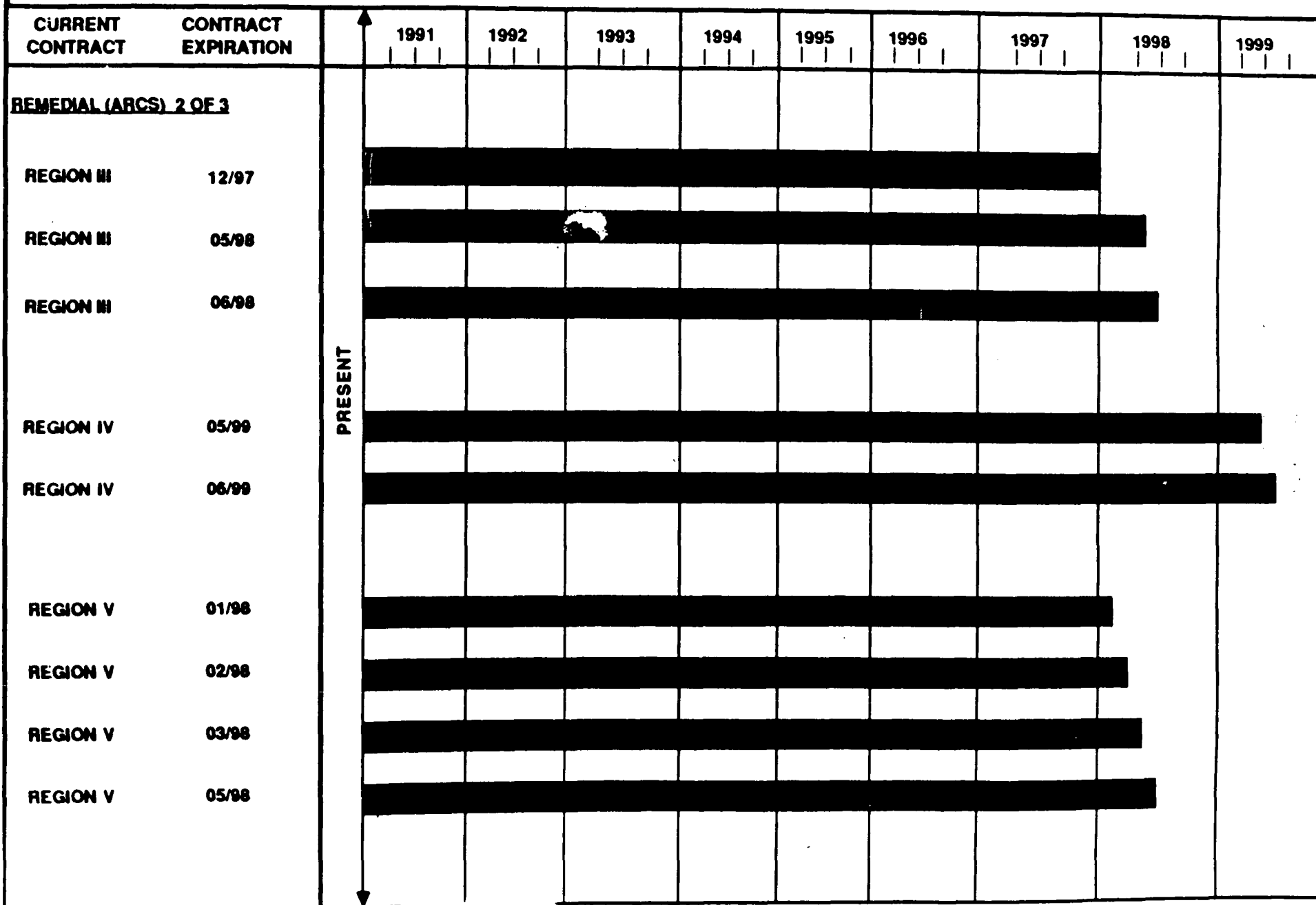
The Hazardous Site Control Division has the main responsibility for coordinating these efforts under the response action contracts (ARCS).

TIME TO IMPLEMENT STRATEGY COMPONENTS



PRESENT

TIME TO IMPLEMENT STRATEGY COMPONENTS



TIME TO IMPLEMENT STRATEGY COMPONENTS

CURRENT CONTRACT	CONTRACT EXPIRATION	1991	1992	1993	1994	1995	1996	1997	1998	1999
REMEDIAL (ARCS) 3 OF 3										
REGIONS VI-VII	09/98									
REGIONS VI-VII	10/98									
REGIONS VI-VII	12/98									
REGIONS VI-VII	03/99									
REGIONS VI-VII	06/99									
REGIONS IX-X	02/99									
REGIONS IX-X	03/99									
REGIONS IX-X	04/99									
REGIONS IX-X	06/99									

PRESENT

Site Specific Contracts

Designated Lead

Region IV is the designated lead for this component.

Current State

Currently, site specific contracts are relatively short-term contracts providing tailored site support. Regions III, IV, V and VII have awarded site specific contracts. The types of services supplied by these contracts varies dramatically from provision of bottled water to excavation of contaminated soil at 27 dioxin sites.

Strategy Goal

The strategy promotes increased use of site specific contracting to maximize cost efficiencies. Decentralizing contracts management to the Regions should encourage increased use of these contract mechanisms.

Implementation Timeline

Use of site specific contracts is ongoing. The Regions are expected to continue evaluating opportunities to use these contracts.

Potential Implementation Issues to be Considered

- o Methods to share information and experience on site specific contracting across Regions
- o Guidelines for developing site specific statements of work and accompanying procurement packages

Detailed Plans

Due Date for Detailed Implementation Plan: February 1991.

TIME TO IMPLEMENT STRATEGY COMPONENTS

CURRENT CONTRACT	CONTRACT EXPIRATION		1991 	1992 	1993 	1994
TECHNICAL ASSISTANCE						
	TAT ZONE I	10/94				
	TAT ZONE II	10/94				

PRESENT

Enforcement Support Contracts

Designated Lead

The Office of Waste Programs Enforcement, CERCLA Enforcement Division is the Designated Lead for this component.

Current State

Currently, there are 8 zone Technical Enforcement Support (TES) contracts; three recently expired. These contracts provide support for selected enforcement oversight activities, PRP searches, negotiations support and litigation support.

Strategy Goal

The strategy integrates all enforcement oversight activities into the ARCS contracts (see Response Action Contracts discussion.) Specialized enforcement support activities (e.g. PRP searches) will be supplied by small Regionally-based contracts. RCRA enforcement support will be supplied through separate contracts. The smaller Enforcement Support contracts will enhance competition and encourage small business participation. Potential responsible party oversight for removal actions will continue to be performed by the removal program Technical Assistance Team.

Implementation Timeline

The Regional Enforcement Support contracts must be implemented by December 1993 when the majority of the TES contracts expire.

Potential Implementation Issues to be Considered

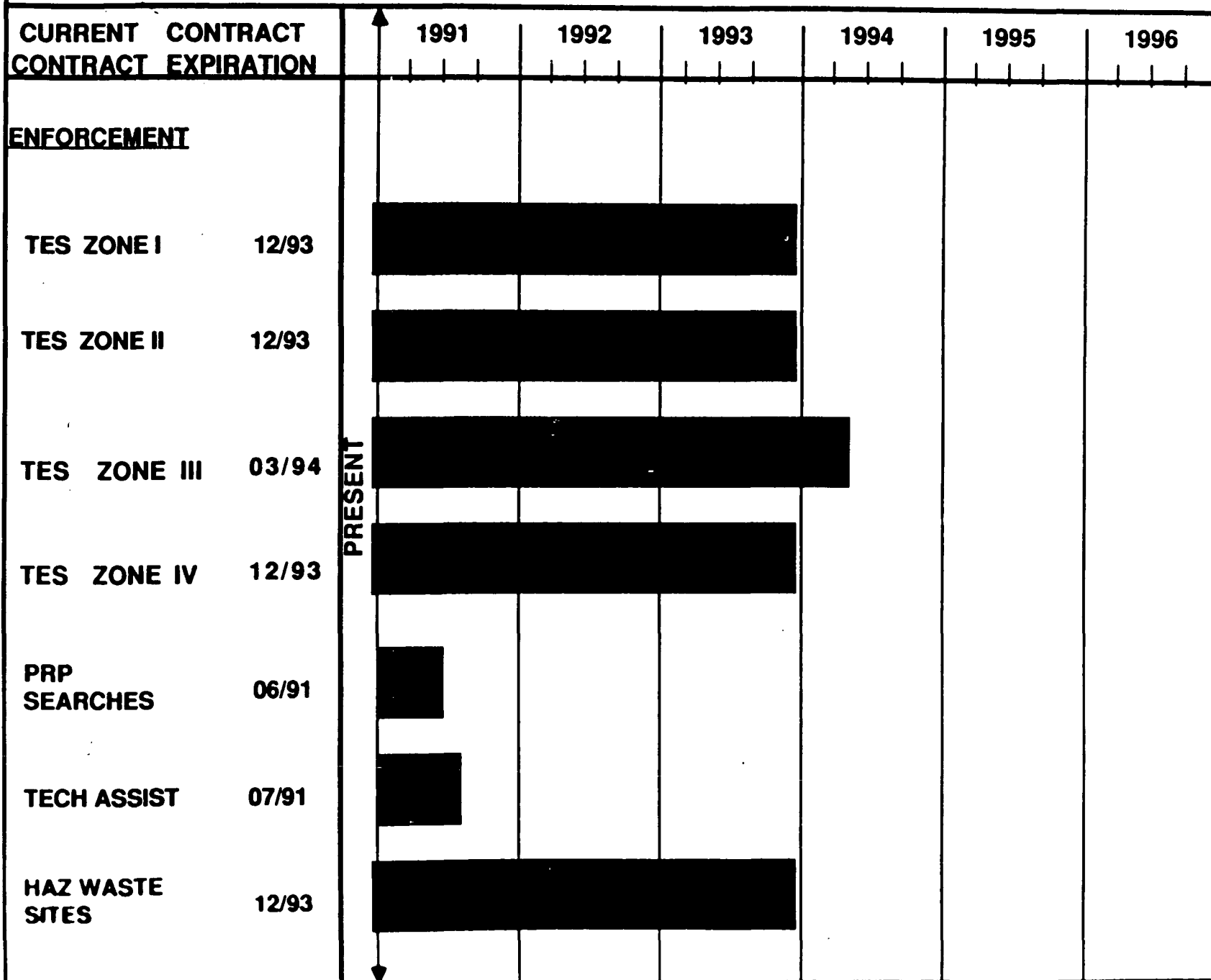
- A strategy for creating separate contracts for RCRA enforcement support.
- o A statement of work will define the functions of the new Enforcement Support contracts and other elements of the procurement packages in view of tasks to be moved to the Response Action Contracts
- o Procedures for allocating funds to compete and administer enforcement support contracts
- o Procedures for allocating funds to response action contracts for oversight (see response action contracts section)
- o Linking regional contracts to CERCLIS/WasteLAN

Detailed Plans

Due Date for Detailed Implementation Plan: February 1991.

Programmatic issues for response action contracts: April 1991

TIME TO IMPLEMENT STRATEGY COMPONENTS



Regional Management Support Contracts

Designated Lead

Region VII is the Designated lead for this component.

Current State

No systematic contracting support exists for Regional administrative and information management tasks.

Strategy Goal

The strategy creates small, Regionally-based contracts providing administrative and information management support. The contracts should encourage more efficient use of EPA OSCs', SAMS', RPMs', RPOs' and Information Management Coordinators' time by supporting their administrative duties. The small contracts should also enhance competition and encourage participation by small business.

Implementation Timeline

Implementation of the Regional Management Support contracts is not contingent on any existing contract timeframes or on the other strategy components. Implementation can occur as Regional needs dictate.

Potential Implementation Issues to be Considered

- o A new statement of work to define the functions of the new Regional Management support contracts.
- o The procurement process (e.g., model SOW, award responsibility)
- o Allocation of funds for procurement and administration of Regional Management Support contracts

Detailed Plans

Due Date for Detailed Implementation Plan: February 1991.

Transportation and Disposal Broker

Designated Lead

The Designated Lead will be determined by the Advisory Committee.

Current State

Prime ERCS and ARCS are responsible for subcontracting transportation and disposal. In addition, most treatment and recycling is performed by the cleanup contractors. The program has experienced delays in arranging for transportation and disposal due to regulatory complexities. The determination of availability of facilities meeting all regulatory requirements and competitive procurement requirements has proven to be confusing and logistically difficult.

Strategy Goal

The strategy must further define functions of a transportation and disposal broker. Two options have been considered. One option is to establish a broker as an information clearinghouse and central point of contact on disposal. The second option would entail the broker not only serving the information function but also conducting actual subcontracting for disposal. Additional analysis of the problems encountered and selection of the appropriate option will be required.

Implementation Timeline

The evaluation of options and analysis of problems should be completed in fiscal year 1991.

Potential Implementation Issues to be Considered

- o RCRA off-site contacts in each Region must be contacted individually regarding facility compliance and inspection issues
- o Each state must be contacted to determine the capacity assurance arrangements
- o Each OSC/RPM must determine whether waste requires treatment prior to disposal
- o Identification of cost-effective alternatives to disposal
- o Coordination of disposal/treatment of materials from sites which may be similar

Detailed Plans

This is a cross-programmatic issue requiring coordination between removal, remedial, and enforcement programs. The Long-Term Strategy Implementation Advisory committee will determine lead responsibility and due date for a detailed implementation plan.

Contract Laboratory Program

Designated Lead

The Analytical Operations Branch of the Hazardous Site Evaluation Division is the Designated Lead.

Current State

The Contract Laboratory Program consists of a contract for the Sample Management Office and multiple contracts with individual laboratories to perform analysis of the majority of samples taken for Superfund sites. This is a Headquarters managed effort.

Strategy Goal

The strategy deferred any decision regarding the decentralization of the Contract Laboratory Program. A separate analysis of this issue is being performed by HSED.

Implementation Timeline

Early in fiscal year 1991 a briefing of upper management will occur on this issue.

Potential Implementation Issues to be Considered

- o Delegation to Regions before or after award
- o Program contractors subcontracting for analytical services
- o Expansion of ESAT

Detailed Plans

A detailed implementation plan will be submitted upon decisions made by upper management.

TIME TO IMPLEMENT STRATEGY COMPONENTS

CURRENT CONTRACT	CONTRACT EXPIRATION	1991	1992	1993	1994	1995	1996
CLP							
CLP-QA TECH	02/94						
CLP-SMO	09/94						

V. Next Steps

Several key steps will need to occur within the next two quarters of the fiscal year (1991). Dates include:

1. Coordination on ARCS/FIT and ERCS issues 12/90
2. Memo to Regions calling for participation 12/90
3. Meeting of the Advisory Committee 1/91
4. Submission of ERCS implementation plan 1/91
5. Submission of all other implementation plans 2/91 - 4/91
6. Advisory committee review of all plans 3/91 - 5/91