United States Environmental Protection Agency

Office of Solid Waste and Emergency Response

EPA

DIRECTIVE NUMBER: 9345.2-03

TITLE: Regional Site Assessment Program Objectives for FY 90

APPROVAL DATE: January 5, 1990

EFFECTIVE DATE: January 5, 1990

ORIGINATING OFFICE: Superfund OERR/HSED

☒ **FINAL**

☐ **DRAFT**

STATUS:

REFERENCE (other documents):

United States Environmental Protection Agency
Washington, DC 20460

EPA OSWER Directive Initiation Request

1. Directive Number: 9345.2-03

2. Originator Information

Name of Contact Person	Mail Code	Office	Telephone Code
B. VanEpps, SDC	OS-240	OERR, OPM, MSDS	475-8864

3. Title

Regional Site Assessment Program Objectives for FY 90

4. Summary of Directive (include brief statement of purpose)

I am transmitting the subject document for your use in implementing the Regional site assessment program during FY 90.

5. Keywords

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	Date
Betti VanEpps, Superfund Document Coordinator	January 5, 1990
10. Name and Title of Approving Official	**Date**
Henry L. Longest II, Director Office of Emergency and Remedial Response	January 5, 1990

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

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

JAN 5 1990

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE
OSWER Directive 9345.2-03

MEMORANDUM

SUBJECT: Regional Site Assessment Program Objectives for FY 90

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

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

PURPOSE

I am transmitting the subject document for your use in implementing the Regional site assessment program during FY 90.

BACKGROUND

This document updates earlier documents entitled, "Regional Pre-Remedial Program Objectives for FY 89 and First Quarter of FY 90" (OSWER Directive 9345.2-02; March 10,1989), "Pre-Remedial Priorities" (Memo from Longest to Division Directors, April 4, 1988) and "Pre-Remedial Strategy for Implementing SARA" (OSWER Directive 9345.2-01; February 12, 1988).

OBJECTIVES

The overall goal of Regional pre-remedial activity remains the identification of the most serious hazardous waste release sites in the nation and evaluating them for the National Priorities List (NPL). Specifically, eight Regional objectives for FY 90 are outlined:

1) Continue EPA's policy of conducting preliminary assessments (PA) within one year of CERCLIS listing in order to prevent the build-up of a PA backlog and to quickly define the appropriate response for each site;

2) Maintain site inspection (SI) momentum during the transition to the revised HRS, particularly in those Regions that have yet to achieve the SARA goal of conducting SIs on all appropriate sites that were in CERCLIS prior to October 17, 1986.

3) Continue the effort initiated in FY89 to review completed SIs to determine which sites require listing site inspections (LSIs) or the development of HRS listing packages. Participate with Headquarters in designing appropriate prioritization factors to assure that "worst sites" are moved to the front of the listing queue.

4) Enter all site assessment decisions/priority recommendations at each step of the evaluation process and all appropriate identifiers (Federal facilities, RCRA, Indian lands, etc.) into CERCLIS as rapidly as possible to facilitate overall program planning and to expedite response to Congressional and public inquiries.

5) Assist Headquarters in finalizing the remaining proposed sites on the NPL.

6) Using Agency sponsored Total Quality Management techniques, work with the Field Investigation Teams, appropriate State agencies, Headquarters quality assurance contractors, and Headquarters Regional coordinators to develop and improve PA, SSI, LSI, HRS package preparation procedures.

7) Participate in the design and implementation of guidance and training activities to implement the revised HRS and new NPL procedures.

8) Participate in the preparation of listing packages for the first NPL Update issued under the revised HRS, presently planned for submittal to OMB by September 30, 1990.

IMPLEMENTATION

The attached document contains implementation guidance to help you address the above objectives. Please review this guidance carefully and apply it to your site assessment efforts over the next year.

CONTACTS

I would like to thank you and your staff for providing many helpful comments on our previous draft. Please call Larry Reed (FTS 475-8602) or Penelope Hansen (FTS 382-6357), if you have questions regarding this document.

Attachment

cc: Superfund Branch Chiefs (Regions I-X)
Superfund Section Chiefs (Regions I-X)
Betti VanEpps

REGIONAL SITE ASSESSMENT PROGRAM OBJECTIVES FOR FY 90 (OSWER Directive 9345.2-03)

PURPOSE:

This document contains the Office of Emergency and Remedial Response (OERR) site assessment objectives for EPA Regions during FY 90. It updates earlier documents entitled, Regional Pre-Remedial Program Objectives for FY 89 and First Quarter of FY 90 (OSWER Directive 9345.2-02; March 10, 1989), "Pre-Remedial Strategy for Implementing SARA" (OSWER Directive 9345.2-01; February 12, 1988) and "Pre-Remedial Priorities" (Memo from Longest to Division Directors, April 4, 1988). It is recommended that the reader review these formerly published directives since all policies of those documents remain in effect unless otherwise changed by this document.

BACKGROUND:

Site assessment program objectives for FY 90 remain substantially the same as outlined in FY 89; to maintain momentum in evaluating sites for inclusion on the National Priorities List (NPL), while factoring in the new requirements of the revised Hazard Ranking System (HRS). Headquarters development of training programs and guidance to implement the revised HRS will begin after the rule has completed Red Border and has been submitted to OMB.

Other than the overriding goal of identifying the most serious hazardous waste release sites in the nation and evaluating them for the NPL, the elimination of the backlog of pre-SARA sites requiring Site Inspections (SIs) prior to reauthorization remains the most important goal of this program. Headquarters is working with the Regions that have not yet achieved the pre-SARA SI goal to evaluate various alternatives for the achievement of this goal prior to reauthorization of SARA.

OBJECTIVES:

Regional objectives for FY 90 are listed below:

1) Continue EPA's policy of conducting preliminary assessments (PAs) within one year of CERCLIS listing in order to prevent the buildup of a PA backlog and to quickly define the appropriate response for each site (i.e., a recommendation to the Removal Program for further evaluation, a recommendation for an SI, or a determination that no further Federal response is warranted).

2) Maintain site inspection momentum during the transition to the revised HRS, particularly in those Regions that have yet to achieve the SARA goal of conducting SIs on all appropriate sites contained in CERCLIS prior to October 17, 1986. Other

than the overriding goal of identifying the most serious hazardous waste release sites in the nation and listing them on the NPL, the elimination of the backlog of pre-SARA sites requiring SIs prior to reauthorization remains the most important goal of this program.

3) Continue the effort initiated in FY89 to review all completed SIs to determine which sites require listing site inspections (LSIs) or the development of HRS listing packages. Participate with Headquarters in designing appropriate prioritization factors to assure that "worst sites" are moved to the front of the listing queue.

4) Enter all site assessment decisions/priority recommendations at each step of the evaluation process and all appropriate identifiers (Federal facilities, RCRA, Indian lands, etc.) into CERCLIS as rapidly as possible to facilitate overall program planning and to expedite response to Congressional and public inquiries.

5) Assist Headquarters in finalizing the last remaining proposed sites on the NPL.

6) Using Agency sponsored Total Quality Management (TQM) techniques, work with the Field Investigation Teams, appropriate State agencies, Headquarters quality assurance contractors, and Headquarters Regional site assessment coordinators to develop and improve PA, SSI, LSI, HRS package preparation, and Headquarters listing procedures.

7) Participate in the design and implementation of guidance and training activities to implement the revised HRS and new NPL procedures.

8) Participate in the preparation of listing packages for the first NPL Update issued under the revised HRS, presently planned for submittal to OMB by September 30, 1990.

IMPLEMENTATION:

Specific comments concerning different components of site assessment activities covered by the above objectives are provided below.

PRELIMINARY ASSESSMENTS (Objective #1):

All comments contained in last year's Directive on this subject still pertain and should be reviewed. In addition, Regional staff, along with FIT contractors and State personnel responsible for conducting PAs, should review the Preliminary

Assessment Guidance for Fiscal Year 1988 (OSWER Directive # 9345.01). This guidance remains in effect and adherence to the prescribed methodologies guarantees consistent decision making throughout the nation. The SCAP goal for FY90, 1875 PAs, has been reduced from that of previous years due to a decrease in CERCLIS entries. All appropriate sites submitted to the Agency for assessment under the Superfund program or identified through Regional discovery activities are to be entered into CERCLIS as expeditiously as possible and evaluated within one year.

SITE INSPECTIONS (Objective #2):

Only Regions VI and X achieved the SARA goal of completing SIs on all appropriate pre-SARA sites by January 1, 1989. We expect Regions III, VII, VIII and IX to achieve this goal in 1990. Regions I, II, IV, and V have a formidable task ahead if they are to eliminate their pre-SARA SI backlog prior to reauthorization. Headquarters and these Regions are working together to evaluate various alternatives for the achievement of this goal. The SCAP target for FY90 has been raised to 1660 SIs, and we expect this number to be exceeded.

Last year's comments on both SSIs and LSIs remain accurate and should be reviewed. Guidance set forth in the SI/HRS Information Bulletin, vol 1, no 1, November 1987, and SI/HRS Information Bulletin, Issue #2, April 1989 (OSWER Directive 9200.5-302) should continue to be used along with the Expanded Site Inspection Transitional Guidance for Fiscal Year 1988 (OSWER Directive 9345,1-02, October 1987) to conduct SIs until additional guidance is issued later in the year. This year all HRS packages will be prepared through a cooperative effort of Headquarters, Regional, State and contractor staff. This will ensure consistant decision making on a national basis for our first NPL update under the revised HRS (see objective #8).

SI REASSESSMENT PROJECT (Objective #3):

Thousands of sites are listed in CERCLIS as having received SIs, but not a decision on further NPL activity. We are unable to tell States and the general public the status of these sites, i.e. if the site is classified NFRAP or is an LSI or NPL candidate. The goal of the SI reassessment project is identical to the goal of 1988's PA reassessment [project, i.e., to review all previously completed SI reports that do not have decisions indicated in CERCLIS and make the decision that (1) an LSI should be conducted or an HRS package developed, or (2) that inadequate information exists to make the decision and additional data must be gathered; or (3) that no further Federal Superfund activity is appropriate.

Although the SI reassessment project was originally projected to be completed in FY89, few Regions were able to review all of the documents necessary to make decisions for all sites that may require further federal activity beyond the SI. For this reason, this project is extended into FY90. Please review last years comments on Objective #3 for more detailed instructions on carrying out the reassessment.

Efforts to determine a nationally consistent method of prioritizing sites for LSIs and the development of HRS packages will be discussed at subsequent Site Assessment Workgroup meetings. The method developed should ensure national consistency while at the same time allowing for specific Regional priorities. It is expected that this issue will be the subject of an OERR Directive in the third quarter of this fiscal year.

This reassessment process to evaluate previous SI documents should be considered part of the original SI work. Therefore, for SCAP purposes, the decisions made as part of the reassessment will not count towards SCAP Completed SI targets.

COMPLETING THE CERCLIS UPDATE (Objective #4):

Although most Regions have done an excellent job of updating CERCLIS and keeping it current, a few Regions have not completed this task. These Regions have recently received memos from Henry Longest on this issue. We suggest that readers review last year's comments on Objective #4, particularly those on the site qualifiers.

NPL FINALIZATION (Objective #5):

Enormous efforts were made in 1989 by everyone concerned to keep to the very ambitious schedule set out at the beginning of the year for listing hundreds of sites final prior to the promulgation of the revised HRS. As you know, 90 sites were proposed last year in four Updates, and 101 sites were finalized in two Final Rules. We are now coming into the home stretch and must complete the finalization of 209 remaining sites before April. Final Rule 8, containing 73 sites, is scheduled for January; Final Rule 9 with approximately 90 sites is scheduled for February 1990; and Final Rule 10, containing some of the most difficult policy decisions the Agency has had to face, is scheduled for March 1990. We request that any information needed from the Regions to assist in finalizing specific sites be sent as soon as possible.

TQM IMPROVEMENTS TO SITE ASSESSMENT (Objective #6):

As was discussed with the Regional Site Assessment Staff at the recent San Francisco Workgroup Meeting, the Agency has committed itself to the continuous improvement of the way in which we conduct the nation's environmental business. The evaluation and listing of sites under Superfund has been selected as one of the pilots for this program. The goal of TQM is to make constant small, but significant, changes to the process in which one is involved in order to make that process more efficiently produce products of higher quality. This initiative could not come at a better time for our program. Because we are making numerous changes pursuant to the revised HRS, we are in an excellent position to institutionalize the process of continuous improvement. While we are only in the beginning stages of this effort, we are interested in the creative ideas and participation of all members of the site assessment community. A TQM workgroup was formed in San Francisco to assist Headquarters in the development of this project. More information on this important initiative will be forthcoming in the near future.

GUIDANCE AND TRAINING DEVELOPMENT (Objective #7):

We expect to begin work with the Guidance and Training Development Workgroup recently formed in San Francisco, after the HRS is sent to OMB. This workgroup is expected to work closely with the TQM workgroup mentioned above. The major difference between the two will be that the guidance and training workgroup is expected to focus on the more technical aspects of work conducted for site assessment, e.g., field procedures, sampling techniques, aerial photography utilization, population data bases, etc. (The TQM group will focus on the more procedural aspects of site assessment and listing.) Documents to be developed will include at a minimum guidance on PAs, SSIs, LSIs, HRS packages, PreScore, Regional QC, and Headquarters QA.

FIRST NPL UPDATE UNDER THE REVISED HRS (Objective #8):

Headquarters, Regional, FIT and State staff, along with Headquarters contractor QA staff, will participate together in the preparation of listing packages for the first NPL Update to be issued under the revised HRS. This update will consist primarily of sites evaluated under Phase I and Phase II of the revised HRS testing program, although other sites may also be considered. SAB plans to implement Total Quality Management objectives in preparing HRS packages under the revised HRS. This will involve more interaction earlier in the process to ensure HRS packages are complete when they are submitted for QA review. This Update is presently planned for submittal to OMB by September 30, 1990.

CONCLUSION:

Directive 9345.2-02 (FY89 program objectives) should be used as a supplement to this document. I have attached a copy for your convenience. If you need any other documents referenced in this directive or have any questions or comments please contact Larry Reed at FTS 475-8602 or Penelope Hansen at FTS 392-6357.

Attachment