

United States  
Environmental Protection  
Agency

Office of  
Solid Waste and  
Emergency Response



**DIRECTIVE NUMBER:** 9345.1-16

**TITLE:** Integrating Removal and Remedial Site Assessment  
Investigations

**APPROVAL DATE:** October 21, 1993

**EFFECTIVE DATE:** October 21, 1993

**ORIGINATING OFFICE:** OERR/HSED

**FINAL**

**DRAFT**

**STATUS:** [ ] A- Pending OMB approval  
[ ] B- Pending AA-OSWER approval  
[ ] C- For review &/or comment  
[ ] D- In development or circulating

**REFERENCE (other documents):** headquarters

**OSWER OSWER OSWER**  
**VE DIRECTIVE DIRECTIVE D**



United States Environmental Protection Agency  
Washington, DC 20460

# OSWER Directive Initiation Request

1 Directive Number  
9345.1-16

## 2. Originator Information

Name of Contact Person S. Caldwell	Mail Code	Office OERR/HSED	Telephone Code
---------------------------------------	-----------	---------------------	----------------

3. Title  
Integrating Removal and Remedial Site Assessment Investigations

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

Provides a model of an integrated assessment process that the Regions can apply in developing plans to meet their specific needs

## 5. Keywords

Integrating, Removal, Remedial

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>Setti Van Eyck</i>	Date 10/5/94
10. Name and Title of Approving Official Henry Longest, II	Date 8/25/94

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

OCT 21 1993

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

Oswer Directive # 9345.1-1685

**MEMORANDUM**

**SUBJECT:** Integrating Removal and Remedial Site Assessment Investigations

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

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

**PURPOSE**

The purpose of this directive is to implement the Superfund Accelerated Cleanup Model (SACM) objective of integrating assessment activities across programs. This directive focuses primarily on the early aspects of the assessment process, typically prior to a determination that a site will be included on the National Priorities List (NPL). It is intended to provide a conceptual model of an integrated assessment process that the Regions can apply in developing plans to meet their specific needs. The directive is intended to support full implementation of SACM in FY 94.

**BACKGROUND**

Many aspects of assessments for removal actions and pre-remedial site assessments are similar or even identical. In spite of that, the two programs have typically operated independently, occasionally duplicating effort at a site or conducting activities with less than optimal efficiency. For example, one program may collect samples that could be used for



Recycled/Recyclable  
Printed with Soy/Candis Ink on paper that  
contains at least 50% recycled fiber

the other program's decision-making but might omit some element critical to the other program's mission (e.g., a background sample, analysis of physical characteristics of sample, etc.).

Integrated assessments under SACM are designed to ensure that all appropriate assessment work is done in the most efficient manner possible. That involves identifying the common denominators as well as the differences across programs and designing systems of data collection so that only the data needed for appropriate decisions are collected at a site. Thus, integrated assessments are more than simply coordinating sampling plans or collecting all possible removal and remedial data needs in a single assessment. Integrated assessments will require that each Region redesign their site notification/discovery efforts, screening processes, and all other aspects of the assessment data collection and decision processes.

#### **OBJECTIVES**

The primary objectives of this integrated assessment process are:

- Faster assessment and response times
- Improved efficiency by eliminating redundant work
- Improved communications
- Better assessment and response decisions

Specific objectives of the integrated removal and remedial site assessments are:

- Perform the initial visit to the site so that it serves the needs of both programs
- Collect common data elements so that they are usable by both programs
- Collect only the data specifically needed for decisions at the site -- e.g., don't collect removal data if the site is clearly not a removal candidate
- Coordinate sample plans across all interested programs
- Minimize "down time" between operations

The conceptual model presented in the fact sheet offers an approach that can meet these objectives. The similarities and differences in approaches are summarized, providing the Regions with information that can be used to develop implementation plans.

## IMPLEMENTATION

The Regions have been developing various solutions to the problem of integrating removal and pre-remedial site assessments. Given the variation in Regional organization structures, somewhat different approaches are to be expected among Regions. However, each Region should develop a conceptual approach that takes into account the general principles of this fact sheet and meets the needs of removal and pre-remedial assessments as efficiently as possible.

The degree of integration will also vary from one site to another. For example, at many sites it is possible to conclude early in the process that no remedial action will ever be taken, even if there is a clear need for a removal. Under those circumstances, the focus of an integrated assessment would be removal data needs. At other sites, pre-remedial site assessment data needs would be foremost. In some cases, both sets of data needs should be addressed. What is of paramount importance is that the possible need to integrate assessment activities is taken into account at every site. Having an integrated assessment process is not simply a matter of performing some integrated assessments that meet the definition of the SCAP measure at selected sites.

While the Regions should be fully operational for integrated assessment in FY 94, we recognize that the current contractor support approach (ARCS and TAT) is not optimal. Under the START contracts, expected to be operational by early FY 95, both removal and pre-remedial site assessment support will be by the same contractor, facilitating the process.

If you have comments or questions regarding this aspect of SACM assessments, please call Steve Caldwell (HSED) at 703-603-8817 or Art Johnson (ERD), 703-603-8705.