



Smart Moves in Superfund – Regional Pilots and Initiatives

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SACM TO STREAMLINE CLEANUP

EPA's Office of Emergency and Remedial Response (OERR) is initiating the Superfund Accelerated Cleanup Model (SACM) to speed and streamline the cleanup process. This model involves four steps.

- (1) Combine the multitude of current site assessment steps into a single process, thereby removing redundant features of that process.
- (2) Create "Regional Decision Teams" to prioritize sites and to select appropriate action.
- (3) Address immediately and comprehensively those sites that pose the greatest threat to public health, notifying the public when these "Early Action" starts begin and end, and using these sites as a primary measure of success.
- (4) Create a list of "Long-term Action" starts for those sites that will require lengthy remediation (e.g., sites with extensive groundwater contamination), explaining to the public that these sites will take years to be cleaned up but pose no immediate threat to health.

OERR is working with the Office of Waste Programs Enforcement and the Superfund Revitalization Office to pilot SACM during FY 92 and FY 93. The strength of SACM is its ability to improve the cleanup system without diminishing important elements of the current system. These elements include early enforcement activities, public participation, and State involvement.

SACM will focus funds on cleanup and assessments that support the goal of cleanup. A premium will be placed on blending the four "cultures" involved in site cleanup – the removal, pre-remedial, remedial, and enforcement staff – to allow for "Early Action" starts to be more widely understood and accepted.

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SACM PLANNING SESSION

On April 14-16, Regional and Headquarters managers met to discuss the implementation of the Superfund Accelerated Cleanup Model (SACM). The focus of this meeting was to understand and resolve the issues involved in accelerating the Superfund cleanup process and implementing the SACM approach. These issues include

- Further combining the assessment process,
- Clarifying the distinction between early action and long-term action, and
- Identifying necessary program management and contractual changes.

Discussions were targeted at developing a well-defined framework for implementation of SACM. Discussion groups defined the implementation plan, addressing when implementation will begin, how the

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Sponsored by the Superfund Revitalization Office (SRO), this bulletin serves as an exchange for Regional information on activities to streamline Superfund. The SRO reports to Richard Guimond, Deputy Assistant Administrator for OSWER, and is directed by Tim Fields

SUGGESTION BOX

As you come up with new ideas on Superfund Revitalization or preliminary findings from your pilots and other initiatives, we want to hear about them and so do the other Regions. This is not necessarily a forum for official policy, but an opportunity to exchange thoughts on streamlining the process. Please send your suggestions to Jan Young, HQ, OS-100, Room 2827, (202) 260-1691.

REGIONS TEST SACM

Incentive funding has been approved for the following Regional pilots that test the recently introduced Superfund Accelerated Cleanup Model (SACM).

Through the START initiative, Region 1 hopes to take advantage of the down time prior to the start of the remedial investigation/feasibility study (RI/FS) at NPL sites in order to accelerate the Superfund process. This time could be used to develop technical strategies that will allow the RI/FS work plan to be more specific, focus investigations towards more promising remedial alternatives, and identify appropriate use of early action removal authorities. Region 1 will also apply the decision team assessment process to 10 more NPL sites

Region 2 and Region 8 plan similar pilots that aim to combine and streamline the expanded site inspection (ESI) and RI/FS, and complete the work by the time a site is proposed for the NPL. The Regions will select high priority Fund-lead sites (likely to score over 28.5 on the HRS) to test this strategy. At the sites, a single ARCS contractor will perform the ESI and RI/FS activities while simultaneously preparing the HRS package. Region 2 suggests that this pilot may be effective at groundwater contamination sites because early identification of plume movement is possible.

A previously approved pilot in Region 3 is another example of a SACM test pilot. The Region is assembling an interdisciplinary team to develop and implement an approach for identifying NPL sites where removal and remedial action can be integrated. The team will develop a questionnaire to be used to screen sites and criteria for determining which program authorities and funding mechanisms can be used at candidate sites.

Region 6 is combining the techniques now being used in the Lightning ROD pilots with the integration

themes of SACM (such as an emphasis on Regional teams) to shorten the overall Superfund process for both Fund- and RP-lead sites by five years. Remedial actions will start in the year following site placement on the NPL.

Region 10 plans to conduct the response action through the removal program at the Yakima Plating site. The site is small (three acres) and the metal contamination is well characterized. The surface soil contamination can be handled by excavation and disposal. Region 10 also has pilots at two NPL sites that require surface contamination removal, but no groundwater restoration. Cleanup could be expedited by conducting removal actions following the completion of the RI and risk assessment. In place of a ROD, the Region will prepare an action memorandum.

Additional SACM pilots are being initiated in Region 5, Region 6, and Region 9. More information on these pilots will be included in the next bulletin.

For further information on these pilots, contact Dennis Huebner in Region 1 at FTS 833-1610, Vincent Piruzzello in Region 2 at FTS 264-3984, Thomas C. Voltaggio in Region 3 at FTS 597-8181, Carl Edlund in Region 6 at FTS 255-6664, Paul S. Arell in Region 8 at FTS 330-7658, or Carol Rushin in Region 10 at FTS 399-7151.

SACM PLANNING SESSION

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program will be implemented, and who will be responsible for the implementation stages. The implementation plans were presented to Don Clay, Assistant Administrator of the Office of Solid Waste and Emergency Response at a plenary session on April 16. Don Clay expressed his commitment to and support for the SACM implementation process.

Finally, before adjourning, the implementation team reviewed the next steps in the long-term implementation of SACM. These include

- Developing an on-going communications strategy,
- Establishing a standing committee of Headquarters and Regional members to address the implementation process, and
- Initiating a process for evaluating the successes of SACM implementation.

SIX REGIONS ACCELERATE CLEANUP THROUGH EARLY ENFORCEMENT

Six Regions are developing innovative approaches in the areas of enforcement and voluntary cleanup that are being piloted in the Superfund program.

Over the next six to eight months, Region 1 is restructuring the Statement of Work (SOW) that accompanies consent decrees at selected pilot sites. Restructuring the SOW will provide incentives and disincentives in the RD/RA negotiation process, resulting in more timely PRP remedies. Discounts on oversight costs or financial incentives for completing cleanup ahead of schedule are examples of the types of incentives proposed.

Region 3 is planning a proactive settlement with 551 *de minimus* parties at the Tonolli Corporation site. The Region will send a letter with the waste-in list to the *de minimus* group announcing a "kick off" meeting and encouraging the parties to organize and establish a steering committee. The purpose of the committee is to develop a single settlement proposal for negotiations.

Region 4 is implementing an "enforcement first" program at the Greenback Industries site and two other sites. The Region combined ESI and RI/FS activities into one event led by the PRPs. The ESI/RI/FS work is being performed simultaneously with the NPL listing activities. Voluntary PRP cleanup (under an administrative order on consent) with EPA oversight is the major benefit of this strategy. Region 4 is also starting a pilot at Aquatech on early *de minimus* settlements concurrent with on-going removal and enforcement activities.

In Region 8 negotiations, the PRP is willing to clean up the Kennecott Mine site and address all other environmental issues in order to continue operating the mine for the remaining years of its life. The final product of the negotiations is anticipated to be an enforceable consent decree in which Kennecott will perform the investigations and all cleanup with oversight by EPA and the State.

Another pilot in Region 8 is planned for the Annie Creek site. The Region intends to use both Superfund and Clean Water Act authorities in a cross-media project to expedite cleanup at the site.

Region 9 proposes to accelerate RD/RA activities at the Operating Industries, Inc. site by pressing for an early settlement with the 3,500 *de minimus* PRPs. The Region plans to notify the parties of liability and negotiate remedy implementation by the end of 1993. Precedents for size, monetary value, and time frame would be set if a *de minimus* settlement of this nature could be achieved.

In Region 10, a pilot is planned to improve the quality and timeliness of PRP searches to address the

"perception of fairness" issue in enforcement activities and settlements. The Region will make available to Headquarters and other Regions its recommendations for streamlining the PRP search process and will include discussions on equity issues in the enforcement program.

Regions 1, 3, and 8 are also planning additional enforcement pilots. These pilots will be described in the next issue of this bulletin.

For further information on these pilots please contact Ira Leighton in Region 1 at FTS 833-1650, Larry Miller in Region 3 at FTS 597-3169, Richard D. Green in Region 4 at (404) 347-5065, Eva Hoffman in Region 8 at (303) 293-1534, Nancy Lindsay in Region 9 at FTS 484-2421, or Carol Rushin in Region 10 at FTS 399-7151.

PRESUMPTIVE REMEDIES USED IN THREE REGIONS TO SPEED CLEANUP

Three Regions continue work in areas that meet the Pilot Projects Program objectives of the 30-Day Study.

Region 9 proposes the use of "plug-in" RODs to accelerate the cleanup at a site near Phoenix. The northern (NIBW) and southern (SIBW) sections of the Indian Bend Wash site have similar contamination and geology. Consequently, the RODs developed for the operable units (OUs) at the NIBW site are almost directly applicable to the SIBW site. The Region plans to use the RODs and alternatives analysis developed for soil and groundwater VOC contamination at NIBW to quickly create new RODs for the OUs at the SIBW site.

Region 7 proposes to develop standard cleanup goals, remedy types, ROD and Statement of Work language, and risk assessment scenarios for grain storage sites, PCB sites, and coal gasification sites. Pilot sites will be selected for application of the standards. A process will be developed to update the standards as science and regulations change.

Region 6 is currently piloting a project that will shorten the RI/FS timeframe by 75 percent at three sites. Details on this pilot are available in the March issue of this bulletin in "Region 6 Cuts Time Between NPL Listing and Design."

For further information on these projects, please contact Jeff Rosenbloom at FTS 484-2362 in Region 9, Gene Gunn at FTS 276-7776 in Region 7, and Steve Gilrein at FTS 255-6710 in Region 6.

PILOTS THAT ARE NOT SITE SPECIFIC

Three regions have introduced innovative projects that aim to improve the Superfund program in general

Region 10 plans to employ an Outreach Specialist to impart the accomplishments of Superfund to the public, the press, Congress, and interested groups. The goals of the pilot are to improve communications and to open an avenue to counter criticism of the program.

Region 3 is focusing on improving the quality of data collected through the Contract Laboratory Program. The Region is updating data protocols and streamlining documentation, providing training to private sector labs, and producing a guidance document for data audits.

Additionally, Region 8 is planning a pilot that will accelerate FY 1993 completions. More information about this pilot will be available in the next edition of this bulletin

For information on these projects, please call Bob Loiselle in Region 10 at FTS 399-6901, and Orterio Villa in Region 3 at FTS 652-2299

BRANCH CHIEF CONFERENCE CALLS

At the May Branch Chiefs meeting in New York, the Branch Chiefs requested that the SRO coordinate monthly conference calls to discuss the status of pilot projects. During the first conference call on June 10, the SRO presented a process for documenting and evaluating pilot findings. Well-documented findings are necessary to facilitate the transfer of improvements to other sites. This process relies on monitoring teams composed of a Regional project manager, a Headquarters contact, and a Regional Counsel contact.

Conference calls were also held on July 8, August 5, and September 2, during which the Regions discussed their monitoring and evaluation plans and their experiences to date. All calls are scheduled for 4:00 p.m. EST. (The next issue of the bulletin will describe the monitoring process in more detail.)



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