



SMART MOVES IN SUPERFUND - REVITALIZATION ONE YEAR LATER

Periodic Bulletin
Superfund Revitalization Office

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It has been a year since EPA announced that it would take aggressive action to revitalize the Superfund program. The goal has been to make the Superfund program more effective, efficient, and equitable. Since then, many important changes have taken place. Regional Decision Teams are being formed to make best use of our cleanup authorities to rapidly reduce risks. Actions are being taken to improve the ways we manage our contractors. Enforcement activities are being started earlier with an eye to improving the information flow to responsible parties.

Change is in the air. We feel it; we hear about it constantly. There are internal activities within the Superfund program that tell us that this is not business as usual within Superfund. Priorities are changing. Emphasis is moving from "pipeline" progress to construction completions. States have been brought in to enlighten and inform. The Regions have been canvassed for good ideas and lessons learned. EPA regional offices convened more than 2,000 public meetings near Superfund sites last year, distributed more than 6,000 different Fact Sheets, and awarded \$5.4 million in Technical Assistance Grants to community groups at more than 100 sites. Public forums are being held throughout the nation to solicit suggestions on how to make further improvements.

Regional and Headquarters personnel this year have begun the difficult process of changing the way we do business. Thirty-two pilot projects have been initiated across the nation to test different aspects of the revitalization effort. The response program is being streamlined, site assessments are being performed more efficiently. There is a greater emphasis on cleanup actions. Cleanup construction projects are underway or have been completed at over one half of the 1,236 National Priorities List (NPL) sites.

The purpose of this bulletin is to highlight some of our accomplishments during this first year of revitalization.

NPL CONSTRUCTION COMPLETIONS

Fiscal year 1992 saw construction completions for sites on the NPL more than double to a total of 149 sites. The sites are located throughout the nation, and represent a wide spectrum of problems and solutions. The number of completions jumped

REVITALIZATION ACTIVITIES

- **EFFECTIVENESS**

NPL Construction Completions
Accelerating Cleanup/SACM
Risk Assessment/Risk Management
- **EFFICIENCY**

Long-Term Contracting Strategy
ARCS Contracts Management
Contract Laboratory Program
- **EQUITY**

Enforcement Policies
- **OTHER ACTIVITIES**

Success Stories
Public Forums
State Meetings

due to strong national and regional leadership and a lot of hard work by staff across the country. Our ability to significantly increase the number of completions also was partially due to the significant amount of groundwork and evaluation already completed at some of these sites. Our goal for fiscal year 1993 is 200 construction completions...an average of one completion a week! We are on our way with a total of 155 construction completions at the end of the first quarter of this fiscal year.

ACCELERATING CLEANUP

To speed up the Superfund process, EPA is rethinking the way sites are evaluated and addressed. The goal is to improve the rate at which risks are reduced by **creating greater flexibility** for taking quicker actions to reduce risks, **reducing duplicative activities** to improve response efficiency, and

applying lessons learned in selecting remedies and setting soil cleanup levels.

Superfund Accelerated Cleanup Model (SACM)

- Regional Decision Teams
- Early Actions that use both removal and remedial response authorities
- Early enforcement and potentially responsible party (PRP) search efforts
- Early community and State involvement
- Improved communications and more realistic expectations for longer-term actions such as groundwater restoration
- Greater efficiency in the site assessment process

SACM Overview

In March 1992, EPA announced a new process to streamline Superfund cleanups -- SACM (Superfund Accelerated Cleanup Model). SACM lays out a formula that merges the quick action of the removal program with the cleanup capabilities of the remedial program, while maintaining the integrity of both programs. "Enforcement First" is still being emphasized in SACM.

SACM is in its pilot stage. The rules that govern Superfund response actions will continue to evolve as Regions implement the principles of the SACM paradigm and discover what works and what doesn't. There is much more work to be done, but much has been accomplished during the past year.

- Thirteen pilots are currently underway to test SACM, including the "lightning ROD" pilots in Region 6 and pilots in Regions 2 and 8 to test combining the site assessment stages of the response action.
- Regional Decision Teams are being formed in most Regions to begin to address sites in a comprehensive manner.
- Annual planning tools (STARS and SCAPS) are being revised to reflect the new flexibility in regional responses, and Headquarters is coordinating with On-Scene Coordinators (OSCs) and Remedial Project Managers (RPMs) to disseminate information about how best to implement SACM.

Presumptive Remedies

EPA is making better use of past experience in cleaning up Superfund sites. Instead of evaluating a dozen potential remedies at every site, EPA will identify two or three remedies that have been selected historically at certain types of sites, such as woodtreater sites or municipal landfills. In this way, data collected will be targeted at a limited number of presumptive remedies, and feasibility studies can be completed faster and at a lower cost.

Much has been accomplished this year in the area of presumptive remedies:

- Preliminary guidance on presumptive remedies for woodtreater sites has been completed and is currently being circulated for comment.
- Guidance is underway for presumptive remedies for solvent-contaminated sites, municipal landfills, and lead-acid battery sites.
- EPA is looking into ways to use innovative technologies along with presumptive remedies, and wants to improve State and public interaction at sites with presumptive remedies.

In addition, the presumptive remedy concept is being tested in Region 9 through the use of "plug-in" RODs, and in Region 10 for sites contaminated with PCBs, as well as coal gasification sites and grain storage sites.

Soil Cleanup Levels

Establishing cleanup standards for chemicals commonly found at Superfund sites can streamline site risk assessments and save time and money. An EPA Workgroup is currently focusing efforts on 30 commonly-found chemicals, and plans to expand the list to about 100 chemicals before its work is complete. Initial risk-based levels for the 30 chemicals address direct contact threats resulting from chronic exposure via inhalation and ingestion in soil.

- Draft list of risk-based levels for 30 chemicals was circulated on March 31, 1992;
- Analysis of past RODs and background levels was completed in June 1992;
- The final report is currently being prepared on soil cleanup levels for 30 common chemical contaminants in soil, stressing consistency between Federal Superfund and RCRA hazardous waste programs.

RISK ASSESSMENT/RISK MANAGEMENT

Risk Assessment

One of the recommendations of the 30-day Study was that the Science Advisory Board (SAB) review the *Risk Assessment Guidance for Superfund* to ensure consistency and reasonableness in the underlying assumptions that may significantly affect the calculation of the perceived risks at Superfund sites. In April 1992, the SAB initiated its review; a final report is anticipated shortly.

Risk Management

Some of the most difficult issues in the Superfund program fall under the heading "risk management." Issues such as "how clean is clean?" are addressed at every site and have significant equity and efficiency implications. The selection of final remediation levels at a site hinges directly on the assumptions made about future land use -- residential, industrial -- and site access. **How much importance should be placed on current land use or historical land use?** Local governments often have the best understanding of the value of specific parcels of land in a community, but they often do not have the advantage of a national perspective in selecting the optimal remedy for a local site.

Headquarters and regional Waste Directors met on June 30, 1992 to discuss major risk management issues, and additional meetings are planned with State agencies to continue the dialogue. Policy directives are being developed to provide guidance to RPMs on difficult risk management issues, such as future land use and groundwater remediation time frames.

IMPROVING CONTRACTS MANAGEMENT

The Agency has taken important steps to improve contracting in Superfund, including the development and implementation of the Long-Term Contracting Strategy (LTCS). The LTCS is built on several key principals: (1) support for the SACM "One Program" approach to site assessment, enforcement, and cleanup; (2) enhancement of competitive opportunities for small and disadvantaged businesses, and (3) greater regional delegation of responsibility for the contracts.

ARCS Contracts Management

The Agency also is engaged in extensive efforts to enhance the management and performance of the Alternative Remedial Contract Strategy (ARCS) contracts. The primary focus is on ensuring that Superfund ARCS contracts are managed efficiently (e.g., contract administrative costs are minimized), and that contractors provide outstanding support to the program. Different aspects of contract management are being reviewed, including the proper application of the award fee process to ensure that the range of the award fees more accurately reflects performance, and "bad" performers lose

opportunity to do additional work. The box below highlights several of our accomplishments to date in the area of improving ARCS contract management and administration.

ARCS CONTRACTING

- Reduction in ARCS program management costs to about 14% of total contract costs for FY92.
- ARCS Regional Management Teams established in each Region to oversee contract management improvements.
- Development of draft guidance directing use of Independent Government Cost Estimates to improve project scoping, as well as greater cost control by the RPMs.
- Contracts management training for regional Waste Directors and Branch Chiefs completed.
- Improvements to award fee process to increase responsiveness and more directly link performance with future work.

Superfund Analytical Services

Analytical operations must be fast and reliable for the Regional Decision Teams to efficiently and effectively develop a strategy for site remediation early in the cleanup process. EPA is developing several useful tools to enhance the speed and quality of analytical services available to OSCs and RPMs.

- **CADRE--Computer Aided Data Review and Evaluation** is a software package designed to expedite the data review process by providing an automated method for reviewing summary data submitted by the Contract Lab Program (CLP) labs. When combined with the average 14-day turnaround times for both organic and inorganic analyses at contract labs, the overall response time for data analysis and review should be reduced significantly.
- **Quick-Turnaround Method (QTM)** is ready and operational. QTM provides rapid (48-hour) turnaround of data from the analysis of water, soil/sediment, and waste samples. QTM produces data of known and documented quality and is available through the CLP.

ENFORCEMENT POLICY/EQUITY

The Superfund revitalization effort is emphasizing increased use of *de minimis* settlements. The hope is that although *de minimis* settlements require time and resources, in the final analysis, there should be increased equity and efficiency, by focusing on the major waste contributors at a site and by reducing transaction costs. To date, the Agency has entered into 81 *de minimis* settlements.

The Agency is collecting information on mixed funding to determine the efficacy of our current policy.

To further reduce transaction costs and assist companies in resolving their liability quickly, EPA in conjunction with the State agencies, is developing a strategy for conducting voluntary cleanups. Some companies are having difficulty obtaining loans and insurance due to potential Superfund liability. Under the voluntary cleanup concept, companies would be able to conduct cleanups, with appropriate oversight, years before the site would be listed on the NPL.

SUCCESS STORIES

Remediating Superfund sites is a huge job, with lots of challenges. At times, regional offices have met these challenges in slightly different ways, with varying degrees of success. At the direction of Rich Gumond, the National Superfund Director, traveling teams visited all ten Regions to identify "success stories" and "lessons learned." The teams solicited from each Region examples of solutions to problems that the Region views as particularly successful. Some innovative approaches represented small changes in the way business is conducted, but resulted in big differences in the efficiency and effectiveness of the program. All of the success stories are currently being compiled; the document will be sent to the Regions in early 1993.

INTERAGENCY COOPERATION

Region 3 produced a handbook with the Department of Defense (DoD), entitled *The Road to ROD*, which provides "tips" on how to streamline administrative procedures at DoD Superfund sites. The manual is well written and imaginatively illustrated, besides providing important insights into ways to shorten the remedy selection and ROD process while being consistent with Superfund policy and the National Contingency Plan.

PUBLIC FORUMS

Good ideas can come from lots of different and varied sources, and the Superfund revitalization effort is soliciting good ideas from all parties interested and concerned about making the Superfund program work better. Public forums have been held on June 24, 1992, in Washington, D.C., and on November 12 and 13, 1992, in Chicago, to solicit suggestions from States, local governments, industry, environmental groups, and the general public. The next public forums are scheduled for February in San Francisco, and May in Dallas.

STATE MEETINGS

Many of the challenges currently facing the Superfund program have been met many times before by some State government. The Federal and State governments are partners in meeting environmental challenges; the Superfund program can learn from their mistakes and from their successes. Regional EPA managers and their State counterparts meet frequently on many site-specific and program management issues. In addition, EPA Headquarters' management and staff have met with State representatives on several different occasions this past year. Issues of discussion included the State role in Superfund revitalization and State experiences in enforcement and community relations, as well as technical issues (e.g., soil cleanup levels), policy issues (e.g., risk management and future land use), and procedural issues. These meetings have been both informative and extremely helpful; we look forward to continuing this constructive national and regional dialogue.

CONCLUSIONS

Major challenges were met in getting 149 NPL site constructions completed. The streamlining of the Superfund response process has begun. The risk assessment procedures have been reviewed, and improvements to our risk management policies are being made. Major improvements to our contracts management program have been implemented. Although many different offices are working on different aspects of Superfund revitalization, all the parts are working for the common goal: accelerated risk reduction through increased efficiency, effectiveness, and equity. Much has been accomplished this year, but much still remains to be done.