

May 9, 2011

Integrated Cleanup Initiative Introduction

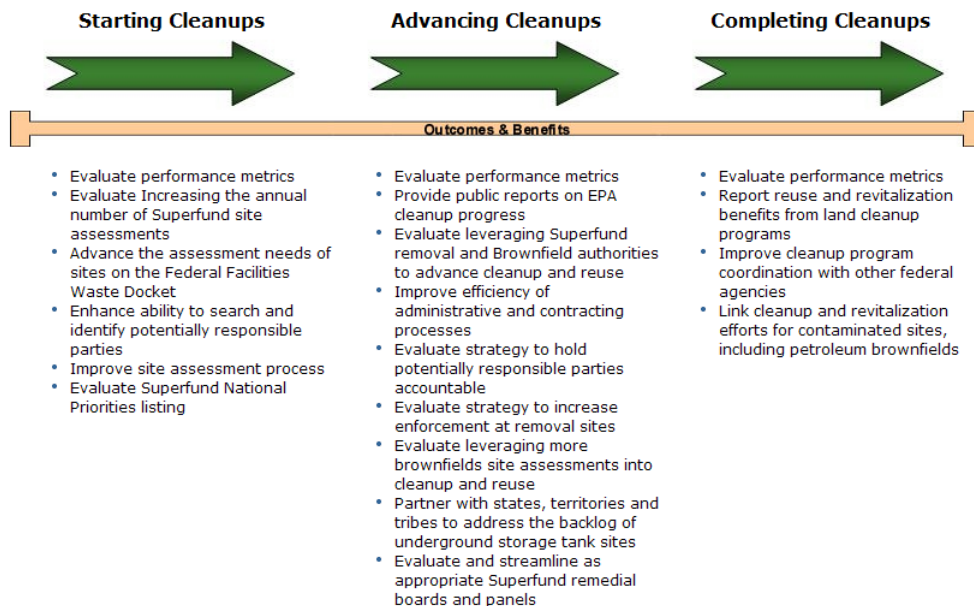
EPA's Office of Solid Waste and Emergency Response (OSWER) in partnership with the Office of Enforcement and Compliance Assurance (OECA) has launched a three-year strategy, the Integrated Cleanup Initiative (ICI or the Initiative), to identify and implement improvements to the Agency's land cleanup programs. The goal of the Initiative is to better use the Agency's land cleanup authorities to accelerate cleanups where possible, address a greater number of contaminated sites, and put these sites back into productive use while protecting human health and the environment.

This Initiative reflects the continued evolution of the nation's land cleanup programs which began in the 1980s. EPA and its key state, tribal, and local partners, including affected communities, have matured in our collaborative approaches to identifying and cleaning up these sites. While progress has been made on many fronts, new challenges and opportunities continue to emerge. For example, large, complex sites demand a much larger portion of EPA's Superfund resources today than was the case in the early years. In addition, some communities are grappling with a number of contaminated sites that are being addressed through multiple EPA and State programs. EPA and its partners want to maximize opportunities to spur cleanup by anticipating how the site could best be cleaned up and reused — an approach that has evolved during the last several decades.

Integrating approaches and leveraging best practices across the full spectrum of contaminated sites — Superfund, brownfields, Resource Conservation and Recovery Act (RCRA) corrective action, federal facilities, and underground storage tanks — is a critical part of this Initiative. Similarly, providing information in a transparent way with opportunities for meaningful engagement will help ensure that affected communities can play an active role in getting sites cleaned up and returned to productive use. Under the Initiative, the Agency will also focus on enforcement activities and continue to seek accountability from those responsible for cleaning up contaminated sites.

Consistent with our new annual 2011 performance measure, Remedial Action Project Completions, a strong project management focus and managing projects to completion are overarching principles for this Initiative. With an enhanced project focus, we will be able to further demonstrate progress at various stages of the cleanup and further optimize the work within the cleanup pipeline.

EPA has developed this Implementation Plan to further describe the goal and objectives of the Initiative and to identify ongoing or new actions the Agency will advance with our partners during the next three years. As depicted below, we use the three stages of the cleanup process common to all EPA's land cleanup programs — starting cleanups, advancing cleanups, and completing cleanups.



The *Starting Cleanups* actions focus on site identification and assessment activities in the early stages of the cleanup continuum. The *Advancing Cleanups* actions emphasize coordination during cleanup activities, including enforcement strategies. The *Completing Cleanups* actions focus on pilot projects aimed at accelerating clean up, reporting to the public and leveraging revitalization efforts as cleanups are completed. Throughout the continuum, there are opportunities for improved performance metrics, communication and coordination among EPA’s programs and partners. These opportunities have been grouped together to form objectives four and five. The *Evaluate Performance Metrics and the Effectiveness of the ICI Activities* actions focus on performance measurement. The *Communicating the Progress* actions focus on communicating the benefits of our cleanup programs.

Collectively, the actions establish a framework of activities, milestone dates, and deliverables that will effectively address a greater number of contaminated sites, accelerate cleanups where possible, return sites to productive reuse where appropriate, and increase transparency across all of EPA’s cleanup programs. Many of the actions identified in this Implementation Plan are already underway; some are complete; others have not yet started. For every action, EPA has identified activities that outline the steps the Agency has taken or will take, the current status, and the scheduled timeframe for the action. The Implementation Plan also designates which OSWER or OECA office will lead each action and identifies other key players (e.g., EPA regional offices, States, Tribes) needed for successful completion. We recognize that there are differences in programs where EPA has the lead versus the States or Tribes. We have tried to focus many of the actions where EPA has the lead so as to minimize any burden to the States and Tribes. Clearly, though, we want to have an open line of communication and share lessons learned amongst all of our regulatory partners. We are committed to working closely with our state and tribal partners as we implement this plan. We anticipate adding more actions or specific activities as the Initiative evolves.

EPA will be transparent and accountable for the actions taken under this Initiative — we are seeking the public and our partners' input on this Implementation Plan, sharing progress along the way, and reporting results.

Integrated Cleanup Initiative Implementation Plan

The Integrated Cleanup Initiative (ICI) Implementation Plan identifies specific actions that EPA's Office of Solid Waste and Emergency Response (OSWER) and the Office of Enforcement and Compliance Assurance (OECA) will evaluate and, where appropriate, undertake in order to meet the goal and objectives of the Initiative. Additional and alternate actions may be identified at a later date.

GOAL **BETTER USE EPA'S ASSESSMENT AND CLEANUP AUTHORITIES, IN AN INTEGRATED, TRANSPARENT AND ACCOUNTABLE FASHION, TO ADDRESS A GREATER NUMBER OF CONTAMINATED SITES, ACCELERATE CLEANUPS WHERE POSSIBLE, AND PUT THOSE SITES BACK INTO PRODUCTIVE USE WHILE PROTECTING HUMAN HEALTH AND THE ENVIRONMENT.**

Objective 1 Starting cleanups

Action 1 – Advance the assessment needs of sites on the Federal Facilities Hazardous Waste Docket

There are over 500 federally-owned contaminated sites (Federal Facilities) in EPA's hazardous waste database for which the disposition is either unknown or unclear. Data shows that some of these sites have not had any actions recorded for an extended period of time—in some instances, up to fifteen years. A workgroup has been developed to review these sites and determine which have been assessed and which have not, and whether any of these sites may pose threats to human health and the environment. Activities under Action 1 include:

- Work with EPA Regional Offices to compile a complete list of sites considered inactive (Completed).
- Determine the disposition of the sites and categorize them accordingly (50%-65% of the sites will be categorized by mid-Summer 2010) (Completed).
- Identify specific obstacles surrounding the progress of inactive sites, gaps in documentation preventing proper site progress, and recommendations for moving sites forward (4th Quarter/FY 2011).

Lead office: FFRRO

Key players: Regions

Action 2 – Strengthen the Comprehensive Environmental Response, Compensation, and Liability Act’s (CERCLA) site assessment and listing processes

In itself, the Superfund Program represents a national site assessment program. While the program assesses a large number of sites, about 4 percent will be placed on the National Priorities List (NPL) and many, including those that are “NPL caliber,” are often best addressed under other cleanup programs. The Superfund site assessment process is a multi-phase approach: starting with pre-CERCLIS screening and concluding with a decision to list a site on the NPL, to seek cleanup under another program, or to consider the site as not needing a response action. EPA utilizes the Hazard Ranking System (HRS) as the principal mechanism for determining whether a site is NPL caliber. In addition, the Superfund Program is implemented with significant work sharing with State programs.

Action 2A – Improve the effectiveness of the current site assessment process under CERCLA

Prior to a site being proposed for listing on the NPL, there are multiple phases of review. Currently, a backlog of about 3,000 sites awaits an assessment decision or final disposition, and each year approximately 200 new sites are added. EPA plans to evaluate the process and seek out new opportunities to either streamline or change existing procedures and policies to make the limited use of site assessment funding as efficient as possible. Activities under action 2A include:

- Evaluate the current backlog of non-Federal sites to determine whether sites are appropriately in the queue (2nd Quarter/FY 2011).
- Evaluate the use and effectiveness of the state and tribal deferral/coordination process (3rd Quarter/FY 2011).
- Identify best practices and innovative methods for assessing sites to reduce the time and costs it takes to complete assessment work (3rd Quarter/FY 2011).
- Determine whether new national policy/guidance could address improving the site assessment process (4th Quarter/FY 2011).

Lead office: OSRTI

Key players: OSRTI, FFRRO, OBLR, ORCR, CPA, OEM, Regions, Tribes, and States

Action 2B – Explore opportunities to revise the Hazard Ranking System (HRS) and related policies

The HRS is the process used to determine whether a site warrants consideration for potential inclusion on the NPL. With greater awareness of new exposure pathways and other emerging issues, EPA will explore whether potential revision of HRS may be warranted. As the HRS is a rule, any revisions would be subject to full notice and comment and therefore may take a significant amount of time. EPA may also explore options to address these concerns through other means if appropriate and available. Activities under Action 2B include:

- Evaluate the HRS to determine which issues of concern would warrant potential revisions (Ongoing).
 - Continue discussions with States and Tribes regarding listing policies.
 - Broaden public dialogue and solicit input on potential revisions.

- Evaluate whether vapor intrusion needs to be more specifically addressed in the HRS through potential rulemaking (2nd Quarter/FY 2012).
- Anticipate issuing an FR notice to begin public dialogue and solicit opinions on potential revision to HRS that will address vapor intrusion (Completed).
- Seek stakeholder input and determine whether new policy/guidance could address some of the emerging issues of concern, *e.g., sensitive populations and soil benchmark for lead* (1st Quarter/FY 2012).

Lead office: OSRTI

Key players: OGC, FFRRO, OPEI, Regions, States, Tribes, and other federal agencies

Action 2C – Improve the transparency and effectiveness of the NPL listing process

Once EPA determines that a site will be proposed for listing on the NPL and, eventually, listed on the NPL, the formal rulemaking process begins. EPA will review its existing processes and look for opportunities to increase efficiency and improve transparency. Activities under Action 2C include:

- In addition to the two NPL listing packages normally issued each year, publish special NPL rulemakings when special circumstances dictate (*e.g., following the regularly scheduled September 2009 NPL rulemaking, EPA issued a special final rule in November 2009. EPA will continue to issue special rules on an as-needed basis.*) (Ongoing).
- Review the universe of proposed NPL sites (Completed).
- Pilot method for streamlining the HRS documentation process (Completed).
- Pilot the use of state programs for completing HRS listing and documentation record (Completed).
- Pilot site discovery initiatives that target categories of sites that have greater potential to be NPL sites (3rd Quarter/FY 2011).
 - EPA regional offices will compile past and present discovery efforts and describe the level of success to which those efforts have led to sites that warrant further evaluation being brought to EPA's attention (Completed).
 - EPA will evaluate this information and identify potential strategies for a proactive discovery initiative (3rd Quarter/FY 2011).
- Determine whether revised policy could improve the transparency and effectiveness of States and Tribes coordination on National Priorities Listing decisions (3rd Quarter/FY 2011).

Lead office: OSRTI

Key players: Regions, FFRRO, OGC, and States

Action 2D – Improve the transparency and effectiveness of the Superfund Alternative Approach (SAA)

The Superfund Alternative Approach is a tool for cooperative Potentially Responsible Parties (PRPs) to conduct a Remedial Investigation/Feasibility Study (RI/FS) and remedial

actions at “NPL-caliber” sites using an enforceable agreement without listing the site on the NPL. The approach saves costs associated with listing, may accelerate cleanup because of the time associated with listing, and provides another standardized CERCLA option for sites where there is a viable, capable PRP. EPA will evaluate possible changes that will enhance the transparency of this approach and further ensure that work under these agreements is equivalent to that at sites on the NPL. Activities under Action 2D include:

- Conduct baseline review of the SAA (Completed).
- Review existing guidance, policies, procedures, and develop enhancements that will promote and support consistency between those sites that use SAA and NPL sites (Completed).
- Explore opportunities to increase transparency and accountability in the process (Completed).
- Evaluate the viability of bringing potential SAA sites to the NPL Listing Panel for review (Completed).
- Determine whether new or revised policy/guidance could improve the transparency and effectiveness of this approach (2nd Quarter/FY 2011).

Lead office: OSRTI and OSRE

Key players: FFRRO, OBLR, ORCR, FFEO, Regions, and States

Action 3 – Process for early identification of responsible parties to support changes in site assessment, NPL listing and early enforcement activities

By finding PRPs as early in the cleanup process as possible, EPA can maximize the opportunities for PRP performance of work throughout the pipeline, including the removal and RI/FS stages, and preserve Trust Fund monies for sites where there are no responsible parties or where parties cannot or will not perform the cleanup. Current processes for initiating and completing PRP searches will be evaluated to identify potential opportunities for earlier and more thorough completions. Activities under Action 3 include:

- Research and analyze data on the costs and benefits of regional PRP search programs and communicate current practices for PRP searches, including issuance of the PRP Search Benchmarking/Regional Practices Evaluation (Completed).
- Evaluate and analyze existing regional and headquarters resources and training needs for PRP search activities and issue proposed recommendations, if any, for changes in PRP search resources and training (1st Quarter/FY 2012).
- Evaluate opportunities for accelerating PRP search activities to maximize PRP performance of the work earlier in the pipeline and revise national PRP search guidance, policies, and/or performance measures, as appropriate, to reflect any recommended changes (2nd Quarter/FY 2012).

Lead office: OSRE

Key players: OSRTI, OEM, and Regions

Objective 2 Advancing cleanups

Action 4 – Leverage Superfund removal and Brownfield authorities to advance cleanup and reuse

The Removal and Brownfields Programs present a great opportunity to leverage program resources to bring more sites from assessment to cleanup and reuse. Working across all regions, this effort will develop consistent approaches for linking and leveraging the Removal and Brownfields programs toward this goal. Activities under Action 4 include:

- Identify regional workgroup (completed), and map out and document in greater detail examples of Regional best practices for decision approaches on possible Brownfields and Removal linkages (examples where Regions are using the Removal or Brownfields authorities and resources to complement the goals of each program and put more sites on the path to productive reuse). Explore and develop additional opportunities for program leveraging. (Completed)
- Distribute these practices and ideas to all Regions; describe potential Removal/Brownfields program liaisons (3rd Quarter/FY 2011 – preparing to finalize and circulate among the regions for review).
- Regions will undertake a comprehensive review of each respective program and research and analyze existing brownfield sites, opportunities for use of the Removal Program, and conversely, where Brownfields resources (including technical assistance) can be used to return old removal sites to productive reuse. (Ongoing).
- Continue to collect data on the complementary use of these two programs and continue to collect and post success stories (Ongoing).

Lead offices: OBLR and OEM

Key players: OSRE, Regions

Action 5 – Opportunities to achieve Human Exposure Under Control at NPL Sites

EPA tracks the Superfund human exposure measure to communicate to the public progress being made towards protecting human health at Superfund National Priorities List (NPL) sites. The Human Exposure (HE) environmental indicator is designed to document long-term human health protection by measuring the incremental progress achieved in controlling unacceptable human exposures at Superfund NPL sites. Sites are assigned to the Under Control category when assessments for human exposures indicate there are no unacceptable human exposure pathways. When EPA does not have sufficient information to determine whether people are exposed at unsafe levels at a site, the site is characterized as Human Exposure Insufficient Data (HE ID). EPA will explore opportunities to facilitate bringing HE ID sites into the status of Under Control more quickly. Activities under Action 5 include:

- Release FY 2009 Evaluation of HE sites (Completed. Report on Human Exposure NUC sites released July 2010).

- Assess exposure conditions and site cleanup progress at Human Exposure Insufficient Data (HE ID) sites (Completed).
- Identify sites where increased focus may move the site out of HE ID and eliminate barriers to moving sites forward (Completed).

Lead office: OSRTI

Key players: FFRRO, OSRE, Regions, Superfund National Environmental Indicators Work Group

Action 6 – Improve efficiency of administrative grant and contracting processes

Action 6A – Superfund

The Superfund Program (*e.g.*, remedial, removal, enforcement, and federal facilities) annually expends more than half a billion dollars to fund or oversee site work. Work at these sites is performed through Potentially Responsible Parties or federal facilities with EPA oversight, EPA-awarded contracts, interagency assisted acquisitions, and by States through cooperative agreements. The Program depends on a suite of tools, including contracts that are flexible enough to meet the Program's needs while using responsible procurement practices. EPA will explore opportunities to improve efficiency within the Superfund contracting processes. Activities under Action 6A include:

- Identify opportunities to move away from high risk contract types (Completed – Phase 2 of Contracts 2010 will address implementation).
- Conduct a resource analysis of remedial construction services options, to create a Draft Construction Delivery Analysis document (3rd Quarter/FY 2011).
- Continue review of existing contracting strategy including issues such as capacity, flexibility, efficiencies, and socio-economic considerations. This includes incorporation of the Office of Management and Budget's recent memoranda related to improvements and efficiencies in the acquisition process. (See http://www.whitehouse.gov/omb/assets/procurement_gov_contracting/increasing_competition_10272009.pdf) (Spring 2011). Finalize and issue the Superfund Contracts 2010 Strategy to guide the acquisition of services. (3rd Quarter/FY 2011).
 - In addition, a supplemental review of the Superfund Remedial Program acquisition process is being conducted:
 - Approach to initial data collection (Completed)
 - Conduct interviews and finalize data collection (3rd Quarter/FY 2011)
 - Draft strategy ready for review (4th Quarter/FY 2011)
 - Final Superfund Remedial Program acquisition strategy and implementation plan (4th Quarter/FY 2011)

Lead office: OSWER-OPM, OARM-OAM Joint Lead

Key players: OSWER - OSRTI, OEM, FFRRO; OECA - OSRE; OA - OSBP, Regions, SRMAC

Action 6B – Brownfields

EPA is undertaking a comprehensive review of process changes to help speed the delivery of brownfields grant resources to cooperative agreement recipients. The scope of the potential changes will include the proposal review processes, the Headquarters selection decision process (including press releases), the Regional award process, and the post award processes for any modifications needed to the cooperative agreement scope of work or timeline. Activities under Action 6B include:

- Work with the Lead Region for this action to identify opportunities to further reduce the grant proposal review timeframe. Develop a model grant announcement process (e.g., press releases, Internet postings). Identify and distribute to Regional brownfield staff and Grants Management Officials best practices for timely award of brownfields grants (Completed).
- Work with the Office of Grants and Debarment (OGD) to review its data on average grant award time frames for each Region and convene a work group to analyze time differences and develop recommendations for reducing times for award, and for making award timelines more consistent. Develop recommendations to enhance post-award efficiencies (e.g., scope changes, etc.) (Completed).
- Adopt and implement any accepted changes (4th Quarter/FY 2011).
- Implement several of the competition-related grant efficiencies in the FY2011 Assessment, RLF, and Cleanup grant competition. (Completed)
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Lead office: OBLR

Key players: OGD, Regions

Action 7 – Streamline, as appropriate, Superfund remedial boards and panels

EPA established the cross regional National Remedy Review Board (NRRB) and the Contaminated Sediments Technical Advisory Group (CSTAG) to improve national consistency in Superfund remedy selection, improve remedy cost-effectiveness, confirm that decision-making at high cost sites is technically sound, and ensure that decisions are in accordance with current laws, regulations, and guidance.

Action 7A – Streamline, as appropriate, National Remedy Review Board

The NRRB provides an expert peer review of high cost proposed remedies, usually near the end of the RI/FS process. EPA will evaluate the operation of the National Remedy Review Board to ensure the Board effectively meets its mission without undo delays, while providing transparency and opportunities for external input (e.g., tribal and community). Activities under Action 7A include:

- Develop revisions to the NRRB “Questions and Answers” Manuals (Completed).
- Evaluate opportunities to improve the functioning of the NRRB (3rd Quarter/FY 2011).
- Evaluate opportunities for increased community, state, and tribal input for use by Board members during internal EPA deliberations (4th Quarter/FY 2011).

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Lead office: OSRTI

Key players: Board members, Regions, OSWER managers, FFRRO, OSRE

Action 7B – Streamline, as appropriate, Contaminated Sediments Technical Advisory Group (CSTAG)

The CSTAG provides expert technical advice throughout the study and implementation phases for large-scale contaminated sediments cleanup projects. EPA will evaluate the operation of the Contaminated Sediments Technical Advisory Group to ensure that it effectively meets its mission without undo delays, while providing transparency and opportunities for external input (e.g., tribal and community). Activities under Action 7B include:

- Evaluate opportunities to improve the functioning of the CSTAG (Ongoing).
- Update guidance addressing CSTAG's role and procedures (2nd Quarter/FY 2011).
- Evaluate opportunities for increased community, state, and tribal input for use by CSTAG members during internal EPA deliberations (4th Quarter/FY 2011).

Lead office: OSRTI

Key players: Board members, Regions, OSWER managers, FFRRO

Action 8 – Opportunities to improve the timeliness, transparency, and quality of remedy decision documents at Superfund sites

Remedy Decision Documents legally document the Agency's remedy selection decision and remedial action plan for the site. These decision documents, among other things, provide the public with a summary of the basis and rationale for the selected remedy. This area is critical because remedy selection becomes the foundation for all future activities at sites. EPA will evaluate the Remedial Investigation /Feasibility Study /Cleanup Decision Making Processes that have evolved over the past 30 years to look for ways to improve efficiency and transparency. Activities under Action 8 include:

- Develop and implement a consistent process for earlier resolution of site-specific Superfund remedy selection issues between Headquarters and Regional offices (Completed).
- Evaluate opportunities to expand community and tribal involvement (Ongoing).
- Convene a Regional/HQ group to evaluate existing guidance and process and identify the need for additional guidance based on emerging issues (Completed).
- Develop training focused on the future of CERCLA remedy selection, expectations for high quality decisions and decision documents, and examples of best regional practices to achieve high quality decisions (3rd Quarter/FY 2011).
- Review and consolidate headquarters' consultation requirements including concurrence process for decision documents for non-NPL and Non-Time Critical Removal Actions (4th Quarter/FY 2011).

Lead office: OSRTI

Key players: Regions, OSRE, FFRRO, and OGC

Action 9 – Record of Decision (ROD) improvement for Federal Facilities (Accelerating and Improving Remedy Decisions)

Develop approaches to improve the quality, timeliness, transparency, and community involvement of Records of Decision documents at Federal Facilities. This action will involve developing a ROD Toolkit, a collection of examples of supplemental graphics, figures, and tables that can make a ROD more succinct and understandable. It will address the need to ensure transparency with regards to the ICs selected and the associated land use restrictions that are part of the selected remedy. The ROD Toolkit will be fully consistent with EPA's *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents* (EPA, July 1999). Activities under Action 9 include:

- Work with the Department of Navy to produce a draft final product, which will be sent to the EPA Regions and to the Navy field offices for review (Completed).
- Finalize the toolkit and work with Navy to disseminate (3rd Quarter/FY 2011).
- Coordinate with the Department of Defense and the other components to encourage the use of the ROD toolkit. Assist DoD with implementation (4th Quarter/FY 2011).

Lead office: FFRRO

Key players: U.S. Department of Navy, DoD, OSRTI

Action 10 – Opportunities to provide greater support in optimizing cleanup of Superfund sites

EPA is continuously seeking to improve the performance, protectiveness and cost efficiency of its Superfund remedies while also exploring opportunities to reduce the impacts of these remedies. Remedy optimization is a set of tools to help evaluate remedies and achieve these goals. It may include third-party site-wide evaluations conducted by expert teams, the use of mathematical tools (e.g., statistical models, decision support and optimization software) to determine optimal operating parameters or monitoring networks, or the consideration of emerging technologies and strategies. EPA has applied these tools to a limited extent over the past ten years, but this action seeks to broaden the application and advances in these tools to sites throughout the cleanup process. Activities under Action 10 include:

- Develop criteria to prioritize categories of sites (consider Fund-lead, PRP-lead, State-lead, and O&M optimization candidate sites) where optimization reviews may provide the greatest benefit to the protectiveness and/or the efficiency of site cleanup activities (3rd Quarter/FY 2012).
- Provide technical support mechanisms to site managers for third-party reviews of select sites throughout the cleanup process. Use the reviews to provide site and program managers information on opportunities to enhance protectiveness and efficiency (Ongoing).
- Provide expertise, information, educational opportunities, and direct support to assist project managers in implementing optimization recommendations (Ongoing).

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- Document suggestions and track implementation progress and results at sites for use in site-specific reviews and to develop and improve optimization practice and education (3rd Quarter/FY 2012-beyond).

Lead office: OSTRI

Key players: OSRE, FFRRO, Regions, States, Other Agencies

Action 11 – Expedite response action by holding all parties accountable to negotiation timeframes and scheduled cleanup commitments

Action 11A – Expedite remedial action by holding all parties accountable to negotiation timeframes

The Superfund enforcement program plays a critical role in helping to achieve timely cleanups by responsible parties. EPA recently issued a revised negotiations policy for remedial design/remedial action (RD/RA) which emphasizes promptly concluding negotiations with PRPs and more aggressively using our enforcement tools. As this policy is implemented, EPA will pursue additional opportunities to expedite the initiation and completion of negotiations with responsible parties in order to begin cleanups as soon as practicable. Activities under Action 11A include:

- Develop new report to monitor planned Records of Decisions (RODs) and upcoming or ongoing RD/RA negotiations for use at dockets, OSRTI and DOJ bi-weekly meetings, and other regional visits to better track compliance with the negotiations policy (Completed).
- Issue recommendations on potential use of an RD/RA negotiation “expeditor” to work with negotiation teams to help manage issues that may delay negotiations and to elevate unresolved issues in a timely manner (Completed).
- Conduct evaluation of the negotiation policy 18 months after implementation to explore its effectiveness and possible actions that may be necessary to improve the process, such as identifying program measures or using a signed Unilateral Administrative Order if negotiations continue beyond a certain date after Special Notice Letters are issued (Begin 3rd Quarter/FY 2011).

Lead office: OSRE

Key players: OSRTI, Regions, and DOJ

Action 11B – Expedite response action by holding parties accountable to scheduled cleanup commitments

The Superfund Enforcement program works to ensure responsible parties meet the cleanup commitments they have made under Superfund enforcement instruments (e.g., consent decrees, administrative orders on consent, unilateral administrative orders, federal facility agreements). EPA recently issued guidance on identifying and tracking substantial noncompliance (SNC) with enforcement instruments that require PRPs to perform work at Superfund sites. EPA also modified CERCLIS, the primary Superfund data system, to facilitate efficient tracking of substantial noncompliance. Building upon these efforts, EPA will explore

opportunities to ensure timely and appropriate enforcement responses to bring parties into compliance to ensure cleanups are completed in a timely manner. Activities under Action 11B include:

- Establish and analyze baseline data on the status of PRP compliance with work obligations under enforcement instruments (Completed).
- Issue a memorandum encouraging Regions to consider unilateral EPA modification of deficient PRP deliverables as a tool to limit cleanup delays, with attached sample letters to PRPs (3rd Quarter/FY 2011).
- Develop and implement an SNC tracking measure supporting timely and appropriate EPA enforcement responses to bring responsible parties into compliance with enforcement instruments (4th Quarter/FY 2011).
- Evaluate compliance trends and existing procedures for responding to significant noncompliance and develop a compliance strategy, if appropriate, for ensuring that cleanups are completed in a timely manner, with emphasis on supporting timely project and construction completion (4th Quarter/FY 2012).

Lead office: OSRE

Key players: FFEO, OSRTI and Regions

Action 12 – Earlier enforcement in the Pipeline at Removal and RI/FS Stages

Action 12A – Promote strategy for early enforcement at removals

The Superfund enforcement program helps get potentially responsible parties (PRPs) to perform removal actions at contaminated sites, which allows Trust Fund monies to be used at other removal sites and increases the number of removals performed overall. EPA will explore opportunities to increase and maximize the involvement of PRPs in removal activities at Superfund sites. Activities under Action 12A include:

- Restate EPA’s commitment to “Enforcement First” at removals and review and analyze EPA guidance, policy, and measures for possible revisions that promote early enforcement at removals (3rd Quarter/FY 2011).
- Enhance coordination between technical, enforcement and legal staff at both the headquarters and regional levels, including creation of a national EPA Removal Enforcement Workgroup, to foster consistent and efficient enforcement practices and to ensure that enforcement options are thoroughly considered before federally funded work is performed at removals (3rd Quarter/FY 2011).
- Identify and communicate best practices that EPA uses to engage PRPs at removals (1st Quarter/FY 2012).

Lead office: OSRE

Key players: OEM, OSRTI, and Regions

Action 12B – Ensure enforcement authorities are used, when appropriate, to maximize PRP performance of remedial investigations/feasibility studies

Consistent with EPA's 2005 memorandum entitled, "Enforcement First at Superfund Sites: Negotiation and Enforcement Strategies for Remedial Investigation/Feasibility Studies (RI/FS)," the Agency looks to responsible parties for performance of the RI/FS at a site, when appropriate. Each year, there are sites where the RI/FS is performed by EPA but the subsequent remedial design/remedial action is performed by potentially responsible parties (PRPs). EPA will evaluate the site-specific cases to ensure the Agency is aggressively using its enforcement authorities to maximize PRP performance of the RI/FS and preserve Trust Fund dollars for those Superfund sites where there are no viable PRPs to perform the work. EPA will determine if opportunities exist to improve the effective and efficient involvement of PRPs in the performance of the RI/FS. Activities under Action 12B include:

- Gather site-specific data and information related to EPA's decision to use the Trust Fund to perform the RI/FS at a site to evaluate whether EPA's current approach for ensuring "enforcement first" for RI/FS is effective at maximizing PRP performance of the RI/FS (3rd Quarter/FY 2011).
- Issue a recommendation to continue the current approach or develop and implement improvements to further promote PRP-lead RI/FSs (4th Quarter/FY 2011).

Lead office: OSRE

Key players: OSRTI and Regions

Action 13 – Effective use of enforcement authorities at RCRA corrective action facilities to ensure timely and protective cleanups

EPA and authorized States have set a goal of attaining final remedy construction at 95 percent of the 3,747 facilities on the RCRA Corrective Action 2020 baseline to clean up environmental contamination at RCRA hazardous waste treatment, storage and disposal facilities by the year 2020 (2020 Corrective Action Goal). To achieve this goal, EPA will look to increasing, and encouraging States to increase, enforcement capacity and develop, promote and communicate nationally consistent enforcement and compliance assurance principles, practices, and tools. In addition, EPA will work with States to evaluate cleanup progress and identify RCRA corrective action facilities where enforcement may be appropriate to help further the 2020 Corrective Action goal. Activities under Action 13 include:

- Issue a national enforcement strategy for RCRA Corrective Action to help achieve the 2020 Corrective Action Goal (Completed).
- Compile and share available data with Regions regarding cleanup status and enforcement history for the 2020 universe of RCRA corrective action facilities (Completed).
- Assess and prioritize EPA-lead RCRA corrective action facilities for targeted use of enforcement in FY 2011, as appropriate (Completed).
- Deliver a workshop, with representatives from Regions and States, that will address how RCRA enforcement and permitting programs can work together to ensure cleanup objectives are met (Completed).
- Identify additional issues that present challenges to pursuing enforcement in a timely manner and evaluate tools, such as the use of CERCLA authorities, to help facility cleanup progress (Ongoing).

- Evaluate the effectiveness of increasing capacity to use enforcement at RCRA corrective action facilities (Begin 1st Quarter/FY2012).

Lead office: OSRE

Key players: ORCR, FFEO, Regions, and States

Action 14 – Partner with states, territories and tribes to address the backlog of Leaking Underground Storage Tank (LUST) sites

EPA is conducting an in-depth analysis of the leaking underground storage tank backlog in partnership with 14 States. The analysis will characterize the backlog of LUST releases within these 14 States to better understand the scope of cleanup work remaining in the tanks program. The analysis will be completed in the 4th Quarter of 2011 and will suggest opportunities for EPA and States to pursue state-specific and national strategies to address the backlog of LUST releases. Activities under Action 14 include:

- Completion of the Backlog Characterization Study (4th Quarter/FY2011).
- EPA will continue to engage States, other stakeholders and communities to identify and prioritize strategies (3rd Quarter/4th Quarter/FY2011).
- EPA and/or States have begun and will continue to pilot strategies (Throughout FY2011).

Lead office: OUST

Key players: OSRE, States, private owners, operators and communities

Action 15 – Evaluate the impacts of brownfields assessment and cleanup grants

In an effort to better understand and demonstrate program benefits, OSWER is conducting a national evaluation of the socioeconomic impacts of brownfields assessment and cleanup grants to determine how the Brownfields Program benefits the people and communities who reside near contaminated or formerly contaminated land (e.g., by improving values of nearby properties, reducing vacancy rates, or attracting capital investment.) Through the use of an evaluation design, we will attempt to determine the extent to which Brownfields grants result in reuse and the improved socioeconomic conditions of surrounding areas. Activities under Action 15 include:

- Develop evaluation goals, framework and timeline. Collect data on assessed brownfields that require no further cleanup action (Completed).
- Using the Brownfields database, ACRES, identify properties that received a Brownfields assessment or cleanup grant (targeting grants from 2003-2008 in first phase). Determine how many of these properties have reported reuses. Based on this initial review of properties, develop and implement a strategy for collecting additional data on reuse (Completed).
- Identify a sample of properties for evaluation. Using Census and other geographical data, estimate socioeconomic changes that have occurred in close proximity to properties over various stages of assessment, cleanup, and reuse (3rd Quarter/FY 2011).

- Analyze the extent to which these changes can be attributed to receipt of Brownfields assessment or cleanup grants (3rd Quarter/FY 2011).
- Based on the results of this analysis, and by developing a more structured and consistent outreach plan to existing Assessment grantees (connecting them to cleanup resources), implement potential Program improvements (4th Quarter/FY 2011 or 1st Quarter/FY 2012).

Lead office: OBLR and CPA

Key players: OPEI/NCEE, Regions, States

Objective 3 Completing cleanups

Action 16 -- Meet the RCRA Corrective Action 2020 Goals

EPA is working closely with its State partners to achieve the 2020 Corrective Action Goal, an aspirational goal to achieve remedy constructions and human health and groundwater environmental indicators for 95% of the 3,747 facilities believed to need corrective action. EPA has met its annual targets for these goals in part due to the corrective action reforms during the late 1990s and the training and program improvement implemented during the early 2000s. Close coordination within EPA and with the 43 States authorized for RCRA corrective action, as well as the utilization of available tools and resources (including the many State voluntary cleanup programs), was key in enabling EPA to meet its goals and will be key as EPA and its State partners continue to make progress toward attaining our 2020 Corrective Action Goal. Action 13, using enforcement authorities where appropriate, is also an essential component of accelerating cleanup progress to attain our 2020 Corrective Action Goal. Activities under Action 16 include:

- Meet the GPRA goals as we work toward the aspirational 2020 Corrective Action Goal
 - EPA has worked closely with its State partners to develop 2020 Corrective Action Workplans, and will continue to build on these as progress in assessing and addressing sites is made.
 - The effort uses a combination of RCRA corrective action, Superfund and Brownfields authorities, and State voluntary programs.
 - Update Regional 2020 workplans to account for changes to targets, goals, and State resources (2nd Quarter/FY 2011).
 - Work with Regions and States to identify innovative approaches (Ongoing).
- Enhance our focus on Federal facilities
 - Build on existing relationships, at the senior management and staff level, with Federal corrective action partners (e.g., Army, Navy, Air force, NASA, DOE).
 - Identify opportunities to facilitate coordination between Federal facilities and State RCRA programs.
 - Determine if unique circumstances/opportunities exist with Federal facilities to expedite corrective action (e.g., BRAC, stimulus funds, PCBs) (Ongoing).
- Highlight progress of cleanups at key facilities

- Better communicate to the public the significant milestones at sites making progress.
- Target long-term, complex, high visibility facilities to highlight.
- Work with Regions to identify facilities to highlight. (1st Quarter/FY 2012)
- Finalize a new RCRAInfo code to better communicate progress at operating facilities as they reach construction completion. (3rd Quarter/FY 2011)

Lead office: ORCR

Key players: Regions, States, OSRE, FFRRO, FFEO

Action 17 – Accelerate and improve the management of Superfund remedial projects

A number of initiatives are underway to explore cost effective options for accelerating remedial action projects and for otherwise improving the way we manage Superfund remedial projects to completion. In some cases, site-specific pilots will demonstrate the effectiveness of region-specific best practices, while in others they are designed to evaluate the potential benefit of new approaches to site project management. Activities under Action 17 include:

- Select pilot projects (Completed).
 - Nine pilots have been identified which are expected to demonstrate a broad range of efficiencies throughout the remedial process.
- Establish project teams and develop management plans (Pilot-specific/Ongoing).
 - Management plans for pilot projects will be developed based on specific project characteristics.
 - Contractors and Agency staff will be selected for activities associated with the delivery of design and construction services.
 - Experts from USACE may assist with scoping and managing project delivery, where appropriate.
- Implement projects and document approaches and results (Pilot-specific/Ongoing).
 - Management approaches, schedules and costs will be documented.
 - Analyses and comparisons of costs and schedules to projected estimates of those that may have resulted from conventionally applied approaches will be performed for each pilot (as appropriate).
 - Additional analysis of project characteristics most favorable to application of acceleration techniques or project management improvements will be analyzed and reported.
- Regions and Headquarters develop list of “best management practices” (BMPs) for managing remedial projects to completion. Regions review and adopt, as appropriate (Completed).
- Headquarters and the Regions will work together to strengthen Superfund remedial site-related technical support (Ongoing).
- OSRTI, OECA, FFRRO, and the Regions will explore options for sharing information about cleanup progress and for publishing schedules related to planned future work (4th Quarter/ FY 2011).

Lead office: OSRTI

Key players: Regions, OSRE, FFRRO, OGC, USACE, other government agencies and contractors

Action 18 – Revitalization, Institutional Controls, and Five Year Review activities

Action 18A – Improve consideration of institutional controls

Institutional controls (ICs) are administrative or legal controls that help to minimize the potential for human exposure to contamination and/or protect the integrity of a response action by limiting land or resource use or by providing information to prevent unsafe exposure. One barrier EPA and others have faced in determining the effectiveness of ICs is the lack of reliable information on the site-specific status of ICs. ICs at construction completion NPL sites are being recorded in the institutional controls tracking component of the Superfund Enterprise Management System (SEMS) to help ensure the long-term effectiveness of ICs. In addition, guidance is needed to provide information for planning, implementing, monitoring, and enforcing ICs. Activities under Action 18A include:

- Ensure sustained implementation of new and existing ICs at NPL sites that are construction complete; track and report progress; ensure transparency by making IC progress at sites readily available to the public (Ongoing).
- Issue interim final guidance *Institutional Controls: A Guide to Planning, Implementing, Monitoring, and Enforcing Institutional Controls at Contaminated Sites* (Completed).
- Issue guidance *Recommended Evaluation of Institutional Controls: Supplement to the “Comprehensive Five-Year Review Guidance”* (3rd Quarter/FY 2011).
- Investigate the potential for using SEMS for those sites with ICs that have been implemented at NPL sites that are not yet construction complete (1st Quarter/FY 2013).
- Issue guidance *Institutional Controls: A Guide to Preparing Institutional Control Implementation and Assurance Plans at Contaminated Sites*. (1st Quarter/FY 2012).

Lead office: OSRTI

Key players: OSRE, FFRRO, ORCR, OUST, OBLR, OEM, Regions

Action 18B – Improve community understanding of five-year reviews

Under CERCLA, a five-year review (FYR) may be required or appropriate when a remedial action leaves hazardous substances on a site at levels that do not allow for unlimited use and unrestricted exposure. Each fiscal year, OSRTI prepares an annual Report to Congress documenting completion of FYRs at sites and their protectiveness determinations. OSRTI tracks the implementation of FYR recommendations that are necessary to make sites protective. Activities under Action 18B include:

- Issue annual report *FY 2009 Superfund Five Year Review Report to Congress* (Completed).

- For sites with “not protective” FYR determinations, develop a report that provides information on the status of implementing recommendations to make the sites protective (3rd Quarter/FY 2011).
- For sites with significant community interest, investigate ways to solicit additional community input during the data gathering for FYRs and explore ways to communicate implementation of FYR recommendations (4th Quarter/FY 2011).

Lead office: OSRTI

Key players: FFRRO, Regions, OSRE, other Federal Agencies, States

Action 18C – Improving timeliness and quality of Five Year Reviews at federal facilities

To improve management controls for five year reviews conducted at federal facilities, FFRRO and FFEO will develop a policy memorandum to the Regions that will outline procedures for tracking, monitoring and implementing five year review recommendations; resolving nonconcurrence of protectiveness statements; and clarify enforcement tools and strategies that are available for submission of late, or technically inadequate reports. Activities under Action 18C include:

- Federal facility five-year review memorandum to the regions (4th Quarter/FY 2011).
- Explore outreach efforts to other federal agencies stressing the importance of timely and high-quality five-year reviews (Completed).

Lead offices: FFRRO and FFEO

Key players: OSRTI, Regions

Action 19 – Link cleanup and revitalization efforts for contaminated sites, including petroleum brownfields

OUST is working in conjunction with EPA’s Office of Brownfields and Land Revitalization (OBLR) and EPA’s Office of Sustainable Communities to deliver technical assistance and provide information to promote the revitalization of former gas stations and other petroleum-contaminated sites. Working in partnership with State and Regional tank programs, local planners and community groups, OUST will identify policy, technical and legal barriers to the reuse of petroleum brownfield sites, with an emphasis on corridor development. Communications and outreach assistance will be used to enhance resource coordination as well as assessment and corrective action planning to support community-inspired redevelopment and other Agency and State initiatives related to sustainability, sustainable communities, and area-wide planning. Activities under Action 19 include:

- Participation in workshops, charrettes, and planning sessions associated with corridors and in-fill development (Ongoing).
- Support of Technical Assistance and Analysis of Revitalization Barriers (Ongoing).
- Development of a Community Workbook to Assist Redevelopment (4th Quarter/FY 2011).

- Development of Informational Document on Petroleum Brownfields Opportunities (3rd Quarter/FY 2011).
- Work with Tribal communities to increase participation in applying for petroleum brownfields grants (Ongoing).

Lead office: OUST

Key players: OSRE, Regional Brownfields, Land Revitalization and UST programs, state and tribal regulatory, Brownfields and economic development offices, smart growth and brownfields advocates, developers, local and tribal government officials and agencies and communities.

Objective 4: Evaluate performance metrics and the effectiveness of the ICI activities

Action 20 – Performance Metrics

OSWER is reviewing our existing performance measures considering transparency, integration of our various authorities and managing to project completions. By presenting performance results in a clear and integrated fashion, we hope to promote greater analysis and an improved understanding of our program.

Action 20A – Performance metrics and cross-program measures and indicators

OSWER's Measures Workgroup is working to craft measures that will better communicate EPA's accomplishments and progress across the spectrum of the site reuse process, from assessment through cleanup. Additional cross-program measures and indicators are being developed to report the progress of our land cleanup programs in an integrated manner. OSWER included a new RA project completions measure in the FY 2011 President's Budget (Action 20B below). The Workgroup's efforts will work in concert with the development of the Agency's FY 2011-2015 Strategic Plan that will occur through the Summer of 2010. OSWER is also exploring the possibility of developing a measure for a set of long-term, complex RCRA cleanups to communicate interim progress as portions of these sites are cleaned up. Activities under Action 20A include:

- Determine if a cross-program protective for people/human exposure under control measure can be included in the Agency's FY2011 - 2015 Strategic Plan (Completed).
- Explore how to align existing site assessment measures to report as one indicator and report out on options (3rd Quarter/FY 2011) – will roll into Action 26A – the FY2011 progress report.
- Finalize measures definitions (Completed).
- Baseline measures (Underway - 1st Quarter/FY 2012).
- Identify options to gather and report site status across the cleanup continuum (3rd Quarter/FY 2011) – will roll into Action 26A – the FY2011 progress report.
- Report annual accomplishments (1st Quarter/FY 2012).

Lead office: CPA and OSWER Measures Workgroup

Key players: OSRTI, OEM, FFRRO, OBLR, OSRE, ORCR, OUST, OPM, Regions

Action 20B – Develop and implement a new Superfund Program Measure, “Remedial Action Project Completions at National Priorities List Sites”

The Superfund Program will begin reporting on a new measure, “Remedial Action (RA) Project Completions at National Priorities List (NPL) Sites,” in FY 2011. The new measure is intended to augment the site-wide Construction Completion measure and reflect the large amount of work being done at Superfund sites. Reporting on the new measure will provide valuable information to communities by demonstrating incremental progress in reducing risks to human health and the environment at sites. The new measure reflects the essential building blocks to achieve several key milestones, including site-wide construction completion, site reuse, and deletion from the NPL. Activities under Action 20B include:

- Establish initial FY 2011 target of RA Project Completions (Completed).
- Develop tools to ensure accurate and consistent reporting (Completed).
- Evaluate program planning data to develop appropriate out year targets (Completed).
- Supplement current guidance on the definition of RA Projects:
 - Establish and utilize a national workgroup to assess current approaches to managing the implementation of remedial action projects, including potential inconsistencies (Completed).
 - Utilize workgroup findings to develop a comprehensive definition of an RA Project and guidelines for the appropriate use of multiple RA projects to support the overall cleanup of a single site (Completed).
 - Finalize an updated definition upon release of the *FY11 Superfund Program Implementation Manual (SPIM)* (Completed).
 - Incorporate the final definition into the comprehensive update of the *Close Out Procedures for National Priorities List Sites* guidance document (4th Quarter/FY 2011).

Lead office: OSRTI

Key players: Regions, FFRRO, OSRE

Action 20C – Develop measurement tools that enhance program transparency by tracking sites from assessment through to completion

The Superfund Program funds a national program of site assessment. However, only a fraction of the sites that are assessed are placed on the NPL and many, including some that are “NPL caliber,” are best addressed under other environmental cleanup programs. EPA will develop a system of policies and program measures that will enhance transparency and ensure that all sites identified by the Superfund program are managed to completion, whether through Superfund or other cleanup Programs. Activities under Action 20C include:

- Track all assessments conducted by the Superfund Program in order to get a more comprehensive picture of workloads and accomplishments (Completed).

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- Finalize a new measure that accounts for all remedial assessments performed at sites addressed by the Superfund program (Completed).
- Develop approaches that allow EPA, States, Tribes, and the public to understand the cleanup status for “other cleanup activity” sites in CERCLIS (i.e., sites that have been deferred to other cleanup programs rather than listing on the NPL (1st Quarter/FY 2012)).

Lead office: OSRTI

Key players: States

Action 21 – Measure the effectiveness of the ICI activities and report annually on ICI

EPA is using a variety of tools to improve transparency and integration of OSWER’s cleanups. EPA plans to measure progress implementing this plan as well as assessing the quality or effectiveness of the tools or approaches used in the plan. Activities under Action 21 include:

- Annually review and report publicly on the progress made on all commitments in this Implementation Plan (4th Quarter/FY 2011, FY 2012, FY 2013).

Lead office: CPA

Key players: OSRTI, OEM, FFRRO, OBLR, OSRE, ORCR, OUST, Regions

Action 22 – EPA/DoD Goal Harmonization Project

Inconsistencies in measuring and reporting program accomplishments within and across governmental organizations may result in: 1) potential misunderstandings by stakeholders regarding program progress and accomplishments, and 2) potential increase in costs and delays. EPA and DoD are committed to working together to harmonize the critical performance measures for assessing Federal Facility and Superfund site cleanup progress. The EPA/DoD Measures Harmonization Workgroup is providing a process for the two agencies to work collaboratively to determine a consistent, transparent approach to performance measures currently used to indicate progress across these cleanup programs. Activities under Action 22 include:

- Develop an analytic cross walk between the federal agencies’ hazardous waste site cleanup reporting frameworks to promote a more consistent, integrated tracking and planning process (Completed).
- Identify the common element of performance measures currently used to track environmental cleanup progress and utilize commonalities to align reporting and work planning processes (Completed).
- Develop recommendations in a formal document for possible consideration and implementation (1st Quarter/FY 2012).
- Explore approaches to harmonizing metrics with DOE and coordinating on RCRA cleanups at Federal Facilities (2nd Quarter/FY 2012).

Lead office: FFRRO

Key players: ORCR and DoD

Action 23 – Improve communication with other federal agencies on measuring cleanup performance

EPA has a set of environmental cleanup metrics for Superfund cleanups. In the case where a different federal agency is responsible for the cleanup, that agency has its own cleanup metrics. Therefore, EPA takes the initiative to notify other federal agencies of their site cleanup progress and future planned accomplishments in a yearly letter. This correspondence updates them on recent FFRRO initiatives, but more importantly, provides the agencies with their planned site data on near-term Construction Complete, Sitewide Ready for Anticipated Use, Five-Year Review, and Environmental Indicator data. Activities under Action 23 include:

- Send out individualized letters, using mid-year FY10 data, to all 13 responsible federal agencies with a site on the NPL (Completed).
- Send out follow-up letters to the DoD Components (Army, Navy, AF, and DLA summarizing planning data and coordination efforts which resulted from the initial letters (Completed).

Lead office: FFRRO

Key players: All 13 federal agencies with a site on the NPL

Action 24 – FFRRO Regional target performance and statistical data analysis

EPA is providing new internal tools and support in an effort to improve future planning of site cleanups in the Federal Response Program. EPA is leading an effort which analyzes a variety of measures and variables, such as current regional targeting practices and historical accomplishment performance, in order to increase the success rate of cleanup target predictions. Activities under Action 24 include:

- Provide a suite of tools to EPA regions to assist with site-cleanup target setting (e.g., training Webinar, best practice guides, etc.) (Completed).
- Complete assessment of historical performance, run statistical analyses, and issue final report (Completed).
- Use the results from the final report to work with specific EPA regions and responsible federal agencies on improving planning processes (1st Quarter/FY 2012).
- Continue to monitor performance data in an effort to evaluate the impacts of increased management support (performed yearly at the end-of-fiscal year).

Lead office: FFRRO

Key players: Regions

Action 25 – Increase the consistency and reduce the cost of Quality Assurance Project Plans (QAPPs) in OSWER Programs

A QAPP presents the steps that should be taken to ensure that environmental data collected are of the correct type and quality required for a specific decision or use. It integrates technical and quality control aspects of a project throughout its life-cycle, including planning, implementation, assessment, and corrective actions. As discovered by GAO at Federal cleanups, QAPPs are widely inconsistent for similar types of projects. The timeline and cost associated with QAPP development and approval directly affects the desired cleanup goals - such as cost-effectiveness, efficiency, and reuse of property. Activities under Action 25 include:

- Develop and present a marketing strategy, for each applicable OSWER cleanup program, in order to encourage the increased use and implementation of QAPPs throughout OSWER (Completed).
- Develop customized QAPP templates for other OSWER cleanup activities, based on Region 2's QAPP implementation in clean-up activities beyond Federal Facilities, for consideration to develop additional regional pilots (4th Quarter/FY 2011).
- Deliver QAPP training to all Regions (i.e., webinar) (1st Quarter/FY 2012).
- Pilot the use of QAPP templates in selected regional clean-up programs (2nd Quarter/FY 2012).
- Develop and use metrics for the pilots to validate early results from initial QAPP implementation in other cleanup programs. Report out on these results (3rd Quarter/FY 2012).

Lead office: FFRRO

Key players: Regions, OBLR, OUST, OSRTI, ORCR, OSRE, States

Objective 5 Communicating the progress

Action 26 – Report reuse and revitalization benefits from land cleanup programs

EPA and its partners have developed several programs to clean up and reuse contaminated land. While early efforts focused on the development of performance measures to evaluate progress in assessing and cleaning up sites, more recently EPA has recognized the need to articulate the impact our programs have on the environment and the socioeconomic status of site-affected communities.

Action 26A – Release a revised OSWER Cleanup Program Progress Report

To communicate in a more integrated fashion the progress and benefits of OSWER's programs, OSWER will release an annual report on our progress. The 2010 report will integrate all of OSWER's cleanup programs and report on the following three indicators or measures: 1) the universe of sites that OSWER is currently involved with; 2) the number of sites and acres at which there is no complete pathway for human exposure based on current site conditions

(Protective for People); and 3) the number of sites and acres that are Ready for Anticipated Use. [Ready for Anticipated Use indicates that the site is a) protective for people; b) all cleanup goals have been achieved for media that may affect current or future use; and c) all institutional controls or other controls to help ensure long-term protection have been put in place.] The full scope of land in the U.S. that is currently contaminated and in need of assessment and cleanup is much larger than what is shown in the universe indicator. There are many other sites that are tracked only at the State or local level. Activities under Action 26A include:

- Release the OSWER Cleanup Program Progress Report, focusing on three indicators or measures (Completed).
- Release an OSWER Cleanup Program Accomplishment Report. Revise the Cross-Program Report to include additional EPA cleanup progress results across all the OSWER programs (1st Quarter/FY 2012).
- Post the Report annually on the Web (4th Quarter/FY 2012).

Lead office: CPA and IPCO

Key players: OSWER Program Offices, OSRE, Regions, and States

Action 26B – Finalize the *Handbook on the Benefits, Costs, and Impacts of Land Cleanup and Reuse*

The *Handbook* brings together the results of recent papers and workshops to provide up-to-date information and recommendations for conducting economic analyses of land cleanup and reuse. A further purpose of the handbook is to clarify important questions that remain in the economic literature. Activities under Action 26B include:

- Complete HQ Program Offices review.
- Complete EPA Economic Steering Committee review.
- Release the *Handbook* (3rd Quarter/FY 2011).

Lead office: CPA, NCEE

Key players: OSWER Program Offices, OSRE, Economic Steering Committee

Action 26C – Estimate the social benefits of cleanup activities by EPA’s Underground Storage Tank (UST) Program

EPA is using an integrated research effort to evaluate two different economic methodologies (hedonic property valuation and stated preference) for assessing the social benefits of UST cleanup. Activities under Action 26C include:

- Finalize the hedonic analysis of how residential property values are affected by leak and cleanup activity at UST sites.
- Finalize the stated preference analysis of how consumers perceive and anticipate responding to the risks of leaking USTs near their homes.
- Compare the two methods.
- Final report of the hedonic analysis (Completed).

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- Final report of the stated preference analysis (Completed).
- Final report comparing the two methodologies (Completed).

Lead office: CPA, NCEE

Key players: OUST

Action 26D – Measuring the economic impacts of Superfund site remediation

To date, EPA has remediated thousands of sites throughout the nation. Along with the associated environmental benefits, there exists anecdotal information on the economic benefits to the communities benefiting from the cleanup. EPA is currently conducting a study to measure the economic impacts of Superfund site remediation for those sites that were listed on the National Priorities List and have been cleaned up. Activities under Action 26E include:

- Coordinate both internal and external peer-reviews of the study (Completed).
- Finalize and release the study (The study has been completed. 3rd Quarter/FY 2011 for release).

Lead office: CPA and OSRTI

Key players: OPM

Acronym List

ACRES	Assessment, Cleanup, and Redevelopment Exchange System
BRAC	Base Closure and Realignment Commission
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CPA	Center for Program Analysis
CSTAG	Contaminated Sediments Technical Advisory Group
DOE	U.S. Department of Energy
DOJ	U.S. Department of Justice
DOD	U.S. Department of Defense
EPA	Environmental Protection Agency
FFEO	Federal Facilities Enforcement Office
FFRRO	Federal Facilities Restoration and Reuse Office
FY	Fiscal Year
FYR	Five Year Review
GPRA	Government Performance and Results Act
HE ID	Human Exposure Insufficient Data
HQ	Headquarters
HRS	Hazard Ranking System
IC	Institutional Controls
ICI	Integrated Cleanup Initiative
ICTS	Institutional Controls Tracking System
IPCO	Innovation, Partnerships, and Communication Office
LUST	Leaking Underground Storage Tank
NASA	National Aeronautics and Space Administration
NCEE	National Center for Environmental Economics
NPL	National Priorities List
NRRB	National Remedy Review Board
OA	Office of the Administrator
OAM	Office of Acquisition Management
OARM	Office of Administration and Resource Management
OBLR	Office of Brownfields and Land Revitalization
OECA	Office of Enforcement and Compliance Assurance
OEM	Office of Emergency Management
OGC	Office of General Counsel
OGD	Office of Grants and Debarment
OPEI	Office of Policy, Economics, and Innovation
OPM	Office of Program Management
ORCR	Office of Resource Conservation and Recovery
OSBP	Office of Small Business Programs
OSRE	Office of Site Remediation Enforcement
OSRTI	Office of Superfund Remediation and Technology Innovation
OSWER	Office of Solid Waste and Emergency Response

OUST	Office of Underground Storage Tanks
PCB	Polychlorinated biphenyl
PRP	Potentially Responsible Party
RA	Remedial Action
RCRA	Resource Conservation and Recovery Act
RCRAInfo	Resource Conservation and Recovery Information System
RD/RA	Remedial Design/Remedial Action
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
SAA	Superfund Alternative Approach
SNC	Substantial Noncompliance
SRMAC	Senior Regional Management Acquisition Council
USACE	United States Army Corps of Engineers
UST	Underground Storage Tanks