

# Chapter 2

## Major Initiatives

In addition to efforts aimed at accelerating the pace of cleanup, the Agency launched major initiatives to improve other aspects of the Superfund program, including

- Improving management and accountability through the appointment of a National Superfund Director and the creation of the Superfund Revitalization Office (SRO);
- Promoting consistency in risk assessment and risk management;
- Advancing the use of innovative treatment technologies;
- Refining contract management; and
- Enhancing communication with the public on the success of the Superfund program in eliminating threats to human health and the environment and on progress in performing environmental restoration.

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### 2.1 THE SUPERFUND REVITALIZATION OFFICE

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Created by the Administrator in October 1991 to improve management and accountability in the Superfund program, SRO consists of a team of 20 “trouble shooters,” led by the National Superfund Director. The mission of SRO is to improve the effectiveness and efficiency of Superfund cleanup and administration, and to assure equity in Superfund enforcement.

SRO supports this mission through two groups: the Superfund Acquisition Group and the Program

and Enforcement Group. During FY92, the Superfund Acquisition Group managed implementation of the improvements to Superfund contracts programs and resolution of U.S. Army Corps of Engineers (USACE) contract issues. The SRO Program and Enforcement Group supported Agency initiatives to accelerate the pace of cleanup and oversaw matters associated with risk assessment and risk management, enforcement, federal facilities, the Department of Justice, and states. Exhibit 2.1-1 illustrates the responsibilities of these groups and highlights the major initiatives pursued by the Agency in FY92.

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### 2.2 PROMOTING CONSISTENCY IN RISK ASSESSMENT AND RISK MANAGEMENT

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During FY92, the Agency implemented several initiatives to enhance consistency in risk assessment and risk management in the Superfund program. By improving consistency in these areas, EPA may more accurately quantify the health threats posed by hazardous substances and improve the decision-making processes for determining how to best address such threats.

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#### 2.2.1 Risk Assessment Initiatives

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Risk assessment is the evaluation of the nature and magnitude of threats to human health and the environment that result from exposure to hazardous substances. The 30-Day Study Task Force examined

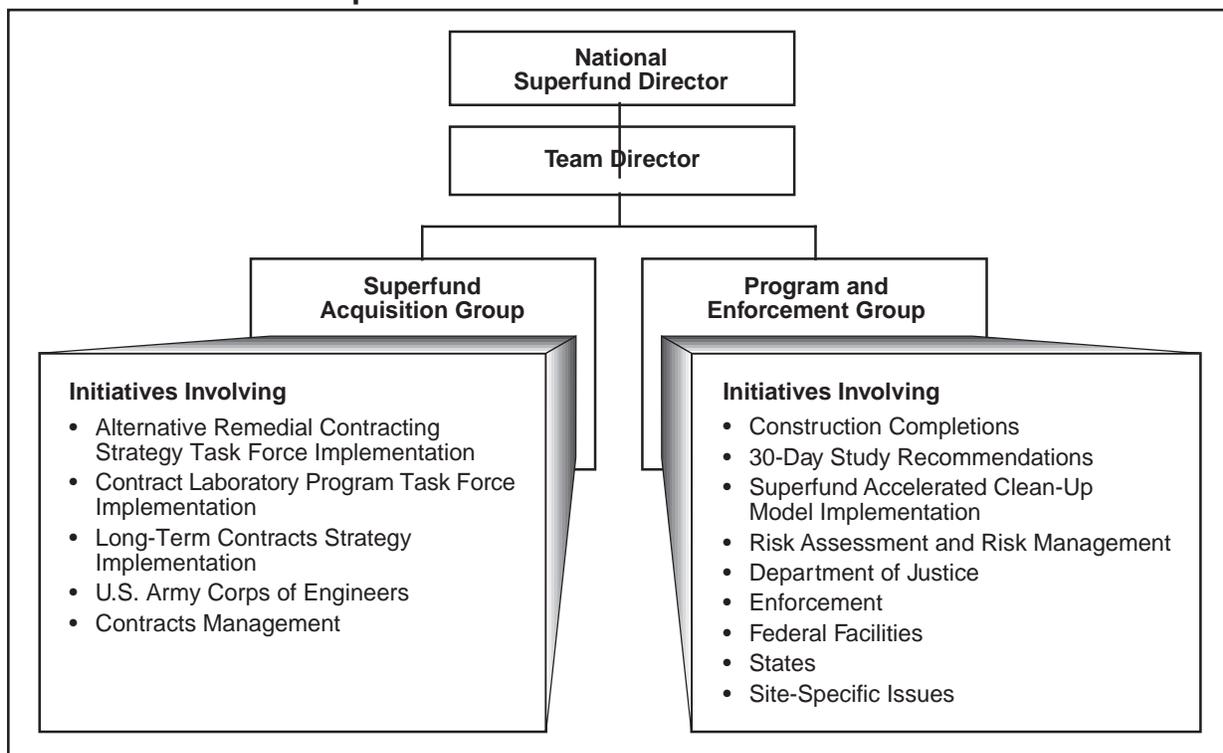
| Acronyms Referenced in Chapter 2 |   |
|----------------------------------|---|
| ARCS                             | Alternative Remedial Contracting Strategy           |
| ATTIC                            | Alternative Treatment Technology Information Center |
| CLP                              | Contract Laboratory Program                         |
| DOD                              | Department of Defense                               |
| DOE                              | Department of Energy                                |
| NPL                              | National Priorities List                            |
| OERR                             | Office of Emergency and Remedial Response           |
| OIG                              | Office of Inspector General                         |
| ORD                              | Office of Research and Development                  |
| OSWER                            | Office of Solid Waste and Emergency Response        |
| PRP                              | Potentially Responsible Party                       |
| RCRA                             | Resource Conservation and Recovery Act              |
| RME                              | Reasonable Maximum Exposure                         |
| SITE                             | Superfund Innovative Technology Evaluation          |
| SRO                              | Superfund Revitalization Office                     |
| START                            | Superfund Technical Assistance Response Team        |
| STL                              | Superfund Technical Liaison                         |
| TIO                              | Technology Innovation Office                        |
| TSC                              | Technical Support Center                            |
| USACE                            | United States Army Corps of Engineers               |

exposure assumptions used in the Superfund program to assess risks. The task force found, with minor exceptions, that the Superfund exposure assumptions were consistent with those used in other EPA programs. The Agency, however, also identified aspects of the exposure assumptions warranting further study and determined that there is a need for better coordination with other Agency programs.

### 30-Day Study Recommendations

As recommended by the 30-Day Study Task Force, the Agency sought internal and external review of Superfund risk assessment guidance. The Office of Emergency and Remedial Response (OERR) directed a review of all FY91 Superfund risk assessments conducted by the Agency. Regional interpretations and applications of risk assessment policies were also reviewed to identify any modifications warranted.

**Exhibit 2.1-1  
Superfund Revitalization Office Structure**



Source: Superfund Revitalization Office.

51-013-25B

The Science Advisory Board and Risk Assessment Council initiated reviews of Superfund risk assessment guidance to identify specific areas that require coordination with other Agency programs. The Science Advisory Board also initiated a review of the new Integrated Exposure Uptake Biokinetic Model, which predicts the lead level in blood of persons exposed to the contaminant. At the end of FY92, the board's reviews were still in progress.

### Risk Assessment Council Evaluation

In February 1992, the Risk Assessment Council completed a review of Agency-wide risk characterization practices. The Agency issued the council's findings in *Guidance on Risk Characterization for Risk Managers and Risk Assessors*. The guidance targets improvements in three principal areas of Agency risk assessments.

- *Characterization of Risk*: The council recommended that risk assessments provide a more thorough characterization of risk, including open discussion of the data and methods used. The guidance suggests that descriptive information accompany numerical risk estimates to ensure a more objective and balanced characterization of risk.
- *Comparability and Consistency*: The council recommended that the Agency work to bring about greater comparability among Agency risk assessments. For example, the estimated risk for an "average" person contracting a disease cannot be accurately compared to the risk for the "most exposed individual." The risk characterization guidance cited above advocates the use of multiple risk descriptors and ranges of exposure for both individuals and the general population to present a more complete and comparable measure of risk.
- *Use of Professional Scientific Judgement and Explanation of Special Circumstances*: The risk characterization guidance highlights the role of professional scientific judgement in overall risk assessment. The guidance calls for detailed explanations when special circumstances preclude a full risk assessment.

During the fiscal year, the Agency began developing Superfund guidance to adopt the council's risk characterization findings. The key change for Superfund risk assessment will be the use of multiple risk descriptors.

Under existing policies, Superfund risk assessments identify the reasonable maximum exposure (RME), a standard that was designed to protect the most exposed and vulnerable individuals. Although the Superfund program will continue to use the RME in evaluating the action necessary to protect human health, the Agency will also consider providing average, or central tendency figures. In addition, the Agency will consider providing estimates of population risk, which typically have not been a part of Superfund risk assessments.

### Other Risk Assessment Initiatives

The Agency responded to concerns raised by industry to EPA's June 1990 policy banning potentially responsible parties (PRPs) from performing risk assessments at Superfund sites. The Agency initiated a year-long study to re-evaluate this policy, examining coordination, duration, and enforcement issues and soliciting public comments.

Other EPA initiatives to improve risk assessment for lead and radionuclides and to enhance risk assessment guidance are discussed in Chapter 3.

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### 2.2.2 Risk Management Initiatives

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Risk management is the process of identifying the actions that can or should be taken to mitigate risks and determining appropriate clean-up levels. In examining Superfund risk management, the 30-Day Study Task Force identified a number of aspects that may lead to variation and inconsistency in decision making. To examine these issues, the Agency established the National Superfund Risk Management Workgroup. During FY92, the workgroup finalized two policies:

- Using a baseline risk assessment for determining the need for remedial action; and
- Distinguishing between principal and low-level threat wastes to determine whether a remedy

using treatment, or using containment and institutional controls, is warranted.

The workgroup also began developing policies on three additional issues: selecting clean-up goals based on cumulative risk for ground water and soil, projecting future land use as it affects remedy selection, and identifying appropriate remediation time frames for ground-water actions.

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## 2.3 ADVANCING THE USE OF INNOVATIVE TREATMENT TECHNOLOGIES

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CERCLA requires that, when selecting a remedy for a Superfund site, EPA give preference to treatment remedies that reduce the toxicity, mobility, and volume of waste at a site. To increase the use of treatment remedies, the Agency works to expand the pool of proven cost-effective treatment technologies available and facilitate access to information about these technologies. Exhibit 2.3-1 illustrates the steps required to develop and implement innovative treatment technologies.

The need for effective treatment technologies is apparent from the increasing universe of contaminated sites. As of the end of FY92, there were 1,275 National Priorities List (NPL) sites, and the number will grow. In particular the number of complex federal facility sites is expected to increase rapidly. In addition to Superfund sites, there are active industrial sites that require corrective action under the Resource Conservation and Recovery Act (RCRA), underground storage tank sites that require soil and ground-water remediation, and sites that are to be cleaned up under state programs.

In 1990, the Agency created the Technology Innovation Office (TIO) to promote the use of innovative treatment technologies for site cleanup. TIO solicited input from technology users—federal and state project managers, consulting engineers, Superfund PRPs, and owners/operators of RCRA facilities—to identify barriers in using innovative treatment technologies. To eliminate obstacles to innovative technology use, the Agency is working on

- Increasing the amount of credible cost and performance data available;
- Centralizing and providing increased access to information;
- Examining ways to overcome regulatory barriers to the development and use of these technologies; and
- Providing technical support to speed cleanup and introduce technology.

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### 2.3.1 Increasing the Availability of Cost and Performance Data

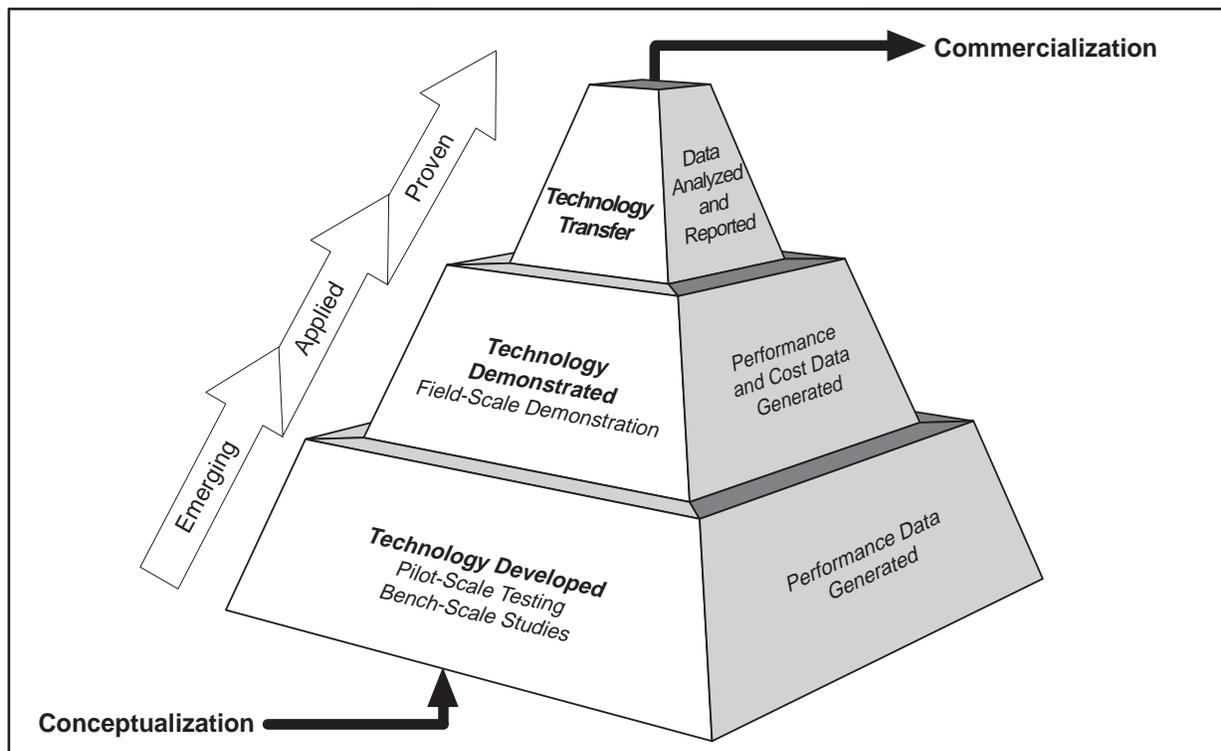
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Insufficient cost and performance data can discourage potential users from trying innovative treatment technologies. Lack of available information stems in part from the fact that many new technologies have not been tested on a pilot scale using actual waste. EPA, in conjunction with other federal agencies, states, and private groups, participated in several programs to demonstrate new treatment technologies and develop critical cost and performance data for promoting technology use and transfer.

#### Developing and Testing Innovative Treatment Technologies

Providing opportunities for technology transfer between the federal government and the private sector, the Superfund Innovative Technology Evaluation (SITE) program under EPA's Office of Research and Development (ORD) spent FY92, its seventh year, developing and evaluating new technologies. The program serves as a mechanism for evaluating field-scale demonstrations of innovative treatment technologies. According to EPA research, treatment technology developers who have conducted SITE field demonstrations have been involved in more than 700 treatability studies at hazardous waste sites and were selected to conduct remediation work at more than 50 percent of the sites. (See Chapter 5 for additional information on the SITE program.)

**Exhibit 2.3-1  
Development of Innovative Technologies**



Source: Office of Research and Development.

51-013-26D

TIO, Region 9, the Office of Federal Facilities Enforcement, ORD, the Department of Defense (DOD), state agencies, and Clean Sites, Inc. (a non-profit organization) sponsored a joint “public-private partnership project,” using federal facilities as the proving grounds to demonstrate innovative treatment technologies. Expanding upon the concepts of the SITE program and the Department of Energy’s (DOE’s) Integrated Technology Demonstration Program, the project involves private companies in the design and evaluation of treatment technologies tested at the federal facility sites. The goal of the project is that all parties accept the applicability of the innovative treatment technologies being tested without asking private groups to risk a trial of new technologies at their own sites. McClellan Air Force Base in Sacramento, California, will be the first public-private partnership project site. (Additional information on the use of federal facility sites to test innovative treatment technologies is provided in Chapters 5 and 7.)

Increasingly, EPA laboratories have conducted work in conjunction with industry through the facilitating mechanisms of the Federal Technology Transfer Act. EPA’s Risk Reduction Engineering Laboratory has developed several techniques. These techniques include a transportable rotary kiln incinerator; the “volume reduction unit,” an advanced mobile soil washer/extractor; the alkaline metal hydroxide-polyethylene glycol and base-catalyzed decomposition chemical treatment processes; and several improved bioremediation and soil-vapor extraction techniques.

#### Other Information Development Efforts

Throughout FY92, EPA worked to develop information on innovative treatment technologies. The Agency convened committees and roundtables composed of federal and private experts in engineering and technological fields to support this effort.

*Bioremediation Action Committee:* EPA created the Bioremediation Action Committee to develop and communicate information about bioremediation, one of the most promising innovative treatment technologies. Bioremediation involves using naturally occurring bacteria to destroy contaminants. The contaminants, a carbon source, are eradicated as they are consumed by the bacteria.

The Bioremediation Action Committee is composed of experts from federal and state agencies, academia, the bioremediation industry, and potential users. The committee developed information on common goals and research needs, coordinated joint actions, generated treatability testing protocols and manuals, collected information for ORD's Alternative Treatment Technology Information Center (ATTIC) bulletin board, and communicated bioremediation experience and progress. With the committee, EPA launched a bioremediation field initiative to evaluate and communicate experience in applying bioremediation to site cleanup.

*Wastech '92:* Wastech '92 was a joint effort by EPA and the American Academy of Environmental Engineers to develop reports on the state-of-the-practice of innovative treatment technologies. The reports, which were under development at the end of FY92, will be reviewed by members of technical and professional societies, engineers, scientists, and members of the waste management community to develop consensus on the benefits, limitations, design criteria, and relative economic viability of innovative treatment technologies.

*Federal Remediation Technologies Roundtable:* The Federal Remediation Technologies Roundtable, composed of representatives of EPA, USACE, DOD, DOE, and the Department of Interior, developed a comprehensive record of performance and cost on innovative treatment technologies used by federal departments and agencies. The information compiled was documented in three publications: *Synopses of Federal Demonstrations of Innovative Site Remediation Technologies; Bibliography of Federal Reports and Publications Describing Alternative and Innovative Treatment Technologies for Corrective Action and Site Remediation;* and *Accessing Federal Data Bases for Contaminated Site Clean-Up Technologies.*

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### 2.3.2 Centralizing Access to Information

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To provide centralized access to information about innovative technologies, TIO and ORD offered several organized and targeted sources of information. Three electronic information sources include ATTIC, the Vendor Information System for Innovative Treatment Technologies, and the Clean-Up Information System. TIO and ORD prepared publications providing information on new developments and the application of innovative technologies, including *Innovative Treatment Technologies: Semi-Annual Status Report; Tech Trends* and *Ground-Water Currents* bulletins; *Innovative Hazardous Waste Treatment Technologies: A Developer's Guide to Support Services;* and *Citizen's Guide to Innovative Treatment Technologies.* The Agency also developed satellite video training seminars and conducted its annual domestic and international forum on innovative hazardous waste treatment technologies. (Additional discussion of these information sources is provided in Chapter 5.)

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### 2.3.3 Overcoming Regulatory Barriers

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During FY92, the Office of Solid Waste and Emergency Response (OSWER) evaluated barriers posed by environmental regulations to the development and commercialization of innovative technologies. Having found that the existing volume-testing limit for an exemption from certain RCRA requirements is insufficient for some pilot-scale testing of innovative treatment technologies, the Agency will propose expanding the testing limit for soil from 1,000 kilograms to 10,000 kilograms.

The Agency will also generate a directive to encourage and accelerate approval of new technology testing at permitted facilities. Testing may occur through the permit modification process or through new research and development permits. To further promote new technology development, EPA will promulgate regulations to address and facilitate the use of bioremediation.

### 2.3.4 Providing Technical Support

ORD provided Superfund Regional staff with direct technical support through five ORD Technical Support Centers (TSCs), Superfund Technical Assistance Response Teams (START), and the Superfund Technical Liaison (STL) Program. The goal of each of these programs is to increase the speed and quality of Superfund cleanups, and reduce their costs, by providing Regional Superfund staff with direct access to the technical expertise and resources of the Agency's active researchers.

- The TSCs provided Regional Superfund staff access to EPA's active researchers in the areas of ground-water remediation, risk assessment, engineering, site characterization, and modeling. TSCs responded to over 443 requests for technical support in 1992.
- The START program provided long-term, intensive engineering assistance to Regional staff for more than 59 sites.
- The STLs are senior ORD scientists who are permanently stationed in Regional offices. The STLs provided direct technical assistance to Regional staff, facilitated interaction with and among ORD laboratories and Headquarters offices, promoted the application of good science within the Regional waste programs, and provided feedback to ORD science planners on Regional technical needs.

## 2.4 IMPROVING AGENCY CONTRACTING

Seeking to balance its environmental mission with effective contract management, the Agency undertook actions for

- Improving Agency contract management and accountability;
- Eliminating excess contract capacity;
- Controlling costs; and

- Securing quality work from contractors by providing incentives for good work and penalties for poor performance.

Agency efforts were based on recommendations made in several studies of EPA contracting methods that were conducted over the past several years. These studies included an FY92 review of Agency-wide contracting by the Standing Committee on Contracts Management.

### Review of the Standing Committee on Contracts Management

In March 1992, the Standing Committee on Contracts Management convened to conduct an in-depth, comprehensive review of EPA contract procurement and management practices and to identify necessary reforms. The committee identified several systemic and process changes to achieve a balance between environmental protection and fiscal management, outlining major reforms in the way EPA operates internally and does business with private companies that provide services to the Agency.

The committee recommended improving the organizational structure of Agency procurement and contract management; increasing the number of Agency procurement, Office of the Inspector General (OIG), and contract debarment and suspension staff; improving human resource procedures to enhance the Agency's ability to attract and retain quality staff for contract management; clarifying the roles of the Agency and its contractors; regulating contractor costs; and increasing the security of Agency information systems. Many committee recommendations reinforced earlier strategies adopted for individual contracts, such as the Alternative Remedial Contracting Strategy (ARCS) contracts. The Agency began implementing committee recommendations during FY92.

### Continuing Contract Initiatives

Other contracting recommendations originated in task force and OIG reviews of two major Superfund contracting strategies: the ARCS program, used to provide contract support for conducting Superfund remedial clean-up actions, and the Contract

Laboratory Program (CLP), used for obtaining laboratory analysis of samples from Superfund sites.

To improve ARCS management processes and oversight, EPA initiated changes to reduce contractor program management costs, eliminate excess contract capacity, improve contract controls and financial reviews, and redesign the award fee process as a more effective tool to enhance contractor performance.

To improve the CLP, the Agency took steps to strengthen internal controls for validating data quality and monitoring laboratory performance, improve management and accountability within the program, centralize methods development, explore alternatives for laboratory certification, and reduce program costs. As recommended by the OIG, the Agency launched an effort to collect all original documentation relating to the analyses conducted under the CLP for use in any future litigation between EPA and PRPs. The Agency also undertook actions to prevent and deal with potentially fraudulent laboratory practices.

Highlights of actions taken during FY92 and the resulting improvements to EPA's contracts programs are discussed in the following sections.

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#### **2.4.1 Improving Contract Management and Accountability**

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To implement a national program that will balance the Agency's environmental mission with effective contract management, the Standing Committee on Contracts Management outlined actions to develop a strong management and leadership presence for EPA.

- The Agency designated a new high-level management position, Senior Resource Official, to bridge the gap in accountability between program and procurement offices and ensure well-managed contracts.
- To reinforce the new direction in EPA contracting, 85 percent of EPA's senior executives attended a training program in contract management and ethics.
- To give the office responsible for contract finance and administration more authority and account-

ability, EPA consolidated contracts, grants, and suspension and debarment functions under the soon-to-be-created Deputy Assistant Administrator for Acquisition and Assistance Management.

Increased Agency resources for managing contracts were also recommended by the committee. To respond, EPA allocated an additional \$3 million for new procurement staff in FY92. The Agency has also increased funding for the OIG by 76 percent over the last four years. EPA will also seek to increase, by 50 percent, the staff overseeing suspension and debarment of contractors, and will broaden the focus of the traditionally criminal-oriented agenda to include suspension and debarment for poor contractor performance.

To attract and retain qualified people in contract management positions, the Agency will improve workforce planning, recruiting, training, career management, rewards, and recognition. During FY92, EPA launched one of the largest and most comprehensive contract management training programs in its history. The Agency added more hours to mandatory training for Remedial Project Managers, including both contract-specific and program-specific training. The Agency developed a training course for Regional Superfund Division Directors to assist them in determining where the Regions need to improve their contract management practices. New EPA job announcements were amended to advise all interested candidates that they will be expected to manage projects.

To oversee implementation of measures to improve ARCS, the Agency established an ARCS Council and Regional management teams. The Agency also created the position of Superfund Acquisitions Manager, in SRO, to oversee all Superfund acquisition activities and decisions.

Management of the CLP was improved as the Agency elevated national program management responsibilities from the branch level to the division level within the Hazardous Site Evaluation Division of OERR. The Agency also increased resources for management of the program. ORD was tasked to take the lead in establishing a process for standardizing the development and validation of the

analytical methods used in the CLP and in continuing a project to study methods integration.

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### **2.4.2 Eliminating Excess Contract Capacity**

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The Agency took steps to eliminate excess capacity in the ARCS contracts. EPA reduced the ARCS contract capacity by \$2 billion and will continue to assess and adjust ARCS contract capacity annually. The Agency also raised the ceiling for remedial actions under the contracts from \$5 million to \$15 million. The new ceiling will enable the Agency to use ARCS contractors to perform the larger scale remedial actions that were formerly conducted solely by USACE. The Agency also issued guidance to the Regions to assist them in assigning work, emphasizing the use of USACE to review the design and construction activities of ARCS contractors.

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### **2.4.3 Controlling Costs**

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The Agency increased controls over contractor costs that are not related to environmental protection, including certain indirect costs and program management costs. Financial monitoring and reviewing were strengthened to detect unallowable costs.

#### **Indirect Costs**

EPA convened a two-day meeting with representatives of EPA's largest contractors and the Defense Contract Audit Agency to discuss plans for tightening contract management generally, and for controlling indirect costs in particular. Indirect costs, or contractor overhead costs such as office rent and general equipment costs, are billed indirectly to the government at a rate established through audits of a contractor's operating expenses.

Although "reasonable" employee morale costs (such as company picnics) are allowable under federal regulations, the Agency will no longer pay for such activities. EPA will clarify its policy on the kinds of indirect charges that it considers unacceptable.

#### **Program Management Costs**

Program management costs consist of charges directly billed to the government for administration and technical support of a contract, in contrast to costs associated with specific contract services such as site clean-up activities. During the fiscal year, the Agency took steps to reduce and regulate program management costs under the ARCS contracts.

The Agency set a national target of 15 percent for ARCS program management costs for FY92. Program management cost goals were established for each separate ARCS contract. When aggregated on a Regional basis, costs would result in the 15 percent goal.

The Agency successfully lowered program management costs for the ARCS contracts from the FY91 national average of 19.7 percent to 14.0 percent in FY92. To achieve the target and assure continued low program management charges, the Agency issued guidance to support cost management activities, provide direction for allocating program management costs to site-specific work assignments for purposes of cost recovery, and improve cost tracking by distinguishing the technical and administrative components of program management costs. EPA also notified ARCS contractors that up to 25 percent of their award fee would be based on their program management cost level.

EPA will incorporate the revised ARCS program management cost concept into future Superfund contracts so that start-up costs, administrative costs, and other clean-up support costs are distinguished, monitored, and controlled.

#### **Financial Monitoring and Reviews**

Both the Standing Committee on Contracts Management and the ARCS Task Force called for increased resources for EPA's OIG to audit Agency contracts and for improvements to contract controls. The Agency issued directives to the Regions requiring invoice reviews and emphasizing the requirement to develop independent government cost estimates for comparison to contractor cost estimates. To further the use of the independent government cost estimates, the Agency evaluated and improved existing cost estimating tools.

To improve the administration of government-owned equipment used by ARCS contractors, the Agency began evaluating the establishment of regional, government-owned, contractor-operated warehouses where all equipment not required on a regular basis could be stored and accessed by ARCS contractors. During FY92, Region 9 began a project to test this approach. The Agency also initiated a study to identify other measures for effective administrative controls of government-owned equipment used by contractors.

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#### **2.4.4 Securing Quality Work from Contractors**

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The Standing Committee on Contracts Management, the ARCS Task Force, and the CLP Task Force recommended measures to assure receipt of quality work from contractors. The Standing Committee on Contracts Management recommended that EPA broaden its debarment and suspension focus to include cases of poor contractor performance.

The Agency took steps to reinforce the dual-incentive approach for affecting contractor performance on ARCS contracts: factoring contractor performance in determining the amount of fee awarded to a contractor and also in assigning future work. The Agency modified the ARCS contractor performance evaluation criteria to include the quality of contract administration in addition to the quality of remedial work. The Agency included reducing program management costs and meeting program management cost targets as significant factors affecting a contractor's award fee. The Agency also issued guidance to reinforce its policy on factoring contractor performance in assigning work.

The Agency implemented both proactive and reactive controls to deter fraud in the CLP. The Agency improved internal controls for the oversight of laboratories and proposed a regulation to establish procedures for Superfund employees to follow when contract laboratories are under investigation for fraud. In a joint effort with DOD and DOE, EPA created a Data Authenticity Program to prevent fraudulent laboratory practices. The Agency also began

evaluating the use of performance bonds by contract laboratories to increase accountability of the laboratories for their performance.

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## **2.5 ENHANCING COMMUNICATIONS**

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To better communicate Superfund progress, the Agency improved measures of program accomplishments and launched new outreach approaches during the fiscal year.

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### **2.5.1 Improving Measures of Superfund Success**

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Historically, the public has measured the Superfund program by the number of sites deleted from the NPL. Although NPL deletions are the ultimate goal of the program, they do not adequately portray the progress that the Agency has achieved in the Superfund program. To be eligible for deletion from the NPL, a site has been assessed to determine the threats posed; remedial activities have been conducted (remedial investigation/feasibility study, remedial design, and remedial action) including construction of the remedy; and the remedy has operated until clean-up goals for the site have been achieved. This process takes years and may sometimes take decades if environmental restoration is involved. Until a policy change in FY92, a site also had to undergo a five-year review after meeting clean-up goals before it was eligible for deletion from the NPL.

Given the attenuated process, the Agency has taken several steps to better define and portray Superfund progress at sites.

- In December 1991, the Agency issued a policy that, for sites where clean-up goals have been achieved, EPA would no longer wait until after a five-year review had been completed to delete a site from the NPL. As of the end of FY92, the Agency proposed to delete nine sites from the NPL under this revised policy, including two sites that were deleted during the year. EPA will

continue to monitor these deleted sites, even though they are no longer on the NPL.

- In another measure to portray progress accurately, federal facility sites have been segregated on the NPL. This distinction will illustrate more clearly the responsibilities of EPA and other federal agencies. Although the common public perception is that EPA is responsible for cleaning up all sites on the NPL, other federal agencies are responsible for implementing Superfund policies at their sites.
- As recommended by the 30-Day Study Task Force, the Agency has measured and communicated its progress in completing clean-up activities necessary to classify sites as construction completions.
- The Agency has introduced the Superfund Accelerated Clean-Up Model to clearly identify the risk reduction and environmental restoration that is accomplished under the Superfund program.

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## 2.5.2 Public Outreach

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The Agency launched a number of outreach efforts to provide the public with information on the progress of the Superfund program. Efforts included issuing several publications, coordinating public meetings, and piloting new public outreach approaches.

### Publications

A number of new publications focusing on Superfund accomplishments were issued in FY92. In the *Superfund at Work* series, the Agency describes the history of Superfund activities at individual sites. The *Compendium of Good Ideas*, an SRO publication, documents successful, Regionally developed approaches to cleanup and enforcement.

To highlight individual clean-up and enforcement accomplishments, the Agency began publishing *Superfund Response Alerts*. As

recommended by the 30-Day Study, the Agency issued the alerts as press releases and sent courtesy copies to members of appropriate Congressional delegations. For especially significant actions, members of the EPA administration visited Superfund sites to meet with local communities.

Efforts to promote public understanding of the role of risk in Superfund site assessments and decision making were enhanced as the Agency developed formal communication plans for major Superfund risk assessment guidance, briefed key Congressional staff on Superfund risk assessment and management procedures, developed a brochure to be distributed to citizen groups, and published an article on the risk assessment process.

### Other Efforts

In June 1992, the Agency held a public meeting to discuss planned and ongoing Superfund initiatives. In this open forum, EPA was able to solicit input from the general public, industry, environmentalists, and interested groups. Following a general discussion, specific topics were examined in breakout sessions, including: fostering voluntary cleanups by PRPs; effectively involving states, communities, and other interested parties in the site clean-up process; communicating Superfund program expectations; and measuring progress of the program. The Agency will take steps to address recommendations made during the meeting and will convene additional public forums.

Seeking ways to improve outreach efforts, Region 10 launched a communications strategy through the OSWER Regional pilot incentive program. The Region employed an Outreach Specialist to convey the accomplishments of Superfund to the public, the press, Congress, and interested groups. The goals of the pilot are to improve communications and to counter criticism of the program.

Chapter 8 of this report provides more information about public outreach efforts conducted by the Agency during the fiscal year.

