Superfund Program Implementation Manual FY 04/05

Chapter II: Program Planning and Reporting Requirements

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Chapter II
Program Planning and Reporting Requirements

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CHAPTER II
PROGRAM PLANNING AND REPORTING REQUIREMENTS

II.A INTRODUCTION

The Government Performance and Results Act (GPRA) establishes a general framework within which the Agency plans its activities. It focuses the Agency on planning strategically (in consultation with both internal and external customers), developing annual performance plans with annual performance goals, and carrying out regular program evaluations to ensure these goals are met effectively and efficiently.

The Office of Emergency and Remedial Response (OERR), Office of Site Remediation Enforcement (OSRE), the Federal Facilities Enforcement Office (FFEO), and the Federal Facilities Restoration and Reuse Office (FFRRO) are responsible for overall program planning, including implementing the requirements of GPRA and reporting on Superfund program accomplishments. ***The Superfund Comprehensive Accomplishments Plan (SCAP) is the process by which the Assistant Administrator for the Office of Solid Waste and Emergency Response (AA SWER), Assistant Administrator for the Office of Enforcement and Compliance Assistance (AA OECA), and senior Superfund managers monitor progress towards meeting GPRA annual performance goals.*** In addition, SCAP will continue to be used as a management tool to project and track activities that contribute to these GPRA goals and support resource allocation. Regions should continue to plan and report accomplishments in WasteLAN as they have done traditionally.

To more clearly reflect the relationship between GPRA and the SCAP process, GPRA annual performance goals and measures and program targets and measures are defined as follows:

- **GPRA Annual Performance Goals (APG) and GPRA Annual Performance Measures (APM)** - The Agency's Annual Plan describes the specific annual performance goals, annual measures of outputs and outcomes, and activities aimed at achieving the performance goals that will be carried out during the year. APGs are the specific activities that the Agency plans to conduct during the fiscal year in an effort towards achieving its long-term strategic goals and objectives. APMs are used by managers to determine how well a program or activity is doing in achieving milestones that have been set for the year. The annual performance goals will inform Congress and Agency stakeholders of the expected level of achievement for the significant activities covered by the GPRA objective. The goals are a subset of the overall planning and budgeting information that has traditionally been tracked by the Superfund program offices.

- **Program Targets and Measures** are activities deemed essential to tracking overall program progress. Program targets are used to identify and track the number of actions that each Region is expected to perform during the year and to evaluate program progress. Program measures are used to show progress made in achieving program priorities. A subset of these program measures will be targeted for work planning purposes.

Successful planning requires the reflection and accurate costing of program priorities in the budget and workload model, and translation of the priorities and resource requirements into specific commitments via the SCAP. Candid evaluation of performance against these commitments is essential to assess the viability of program priorities, resource requirements and overall program effectiveness.

II.B INTEGRATED PLANNING

Integrated planning is the responsibility of HQ and Regional program offices; Regional finance offices; the States; Tribes; affected communities; the Office of Regional Counsel (ORC); DOJ; and other Federal agencies. Information on planned activities should also be coordinated with the Natural Resources Trustees and the Agency for Toxic Substances and Disease Registry (ATSDR). To provide adequate resources to achieve Superfund's GPRA objectives and sub-objectives, HQ allocates resources within and between the response, enforcement, and Federal facilities programs. Regions are responsible for providing data on the level of resources needed to accomplish those priority activities and negotiate commitments consistent with realistic site planning. Regions should not accept targets that require completion of activities that cannot be funded or staffed within the resources provided. This requires Regions to reconcile FY 04/05 targets and their Superfund pipeline with the financial operating plan proposed by HQ.

Flexibility is greatest in the budget planning years. Realistic out year planning data (milestones and funding needs) allows HQ to prepare requests for resources based on Regional needs. Exhibit II.1 summarizes levels of flexibility as the operating year is entered. Major phases in the decision making continuum include:

- *Formulation of the out year GPRA annual performance plan and budget occurs 12 to 18 months prior to the FY.* The GPRA annual performance plan includes objective, results-oriented, quantifiable and measurable performance goals; resources necessary to meet goals; performance indicators to assess outputs, services, and outcomes; and verification and validation procedures. Development of the budget includes identification of major program issues, analysis of program costs, and alignment of resources among competing priorities. Activities receive resource allocations that are established by the Administrator and the Assistant Administrator for the Office of Solid Waste and Emergency Response (AA SWER) or the Assistant Administrator for the Office of Enforcement and Compliance Assurance (AA OECA).

- *Development of the initial operating plan occurs six months prior to the FY and generally is finalized early during the FY.* OSWER and OECA provide resources to support the program through the Advice of Allowance (AOA) and workload process. Regions are expected to work within the annual Regional budgets established at the start of the year until the mid-year evaluation. Regions have flexibility within the general budget and AOA structure to shift funds as needed to meet priority activities. (See Chapter III for additional information on shifting funds.) Once the operating plan is established at the start of the year, additional resources generally can be shifted to a Region only at the expense of resources from other Regions. However, HQ may shift funds among the Regions depending on the level of use and need.

- *Use of the mid-year evaluation to realign resources in the current FY.* Current year resource adjustments focus on changes needed due to cost and project schedule modifications. Changes may result in shifts within program areas and among Regions, and revised annual funding levels. Estimates developed in April/May for the upcoming FY represent the first formal opportunity for changing resources among program areas at a national level. The revised resource estimates also serve as a "baseline" for examining program needs in the budget year.

Exhibit II.2 describes the information flow and HQ and Regional responsibilities associated with integrated planning.

II.C INTRODUCTION TO THE SUPERFUND COMPREHENSIVE ACCOMPLISHMENT PLAN (SCAP)

The SCAP process is used by the Superfund program to plan, budget, track, and evaluate progress toward achieving Superfund GPRA objectives and sub-objectives. The SCAP planning process is a dynamic, ongoing effort that has a significant impact on Superfund resource allocation and program evaluation. Planned obligations and reporting of GPRA annual performance goals and measures are generated through SCAP and influence the Superfund budget and evaluation process. Such planning is a day-to-day responsibility of the Regions. An annual process has been established through which HQ and Regions formally develop work plans for the future. WasteLAN serves as the conduit for the SCAP process by providing both HQ and Regions with direct access to the same data. Through WasteLAN, reports can be produced allowing for daily interactive updates of planning and site cleanup progress information.

II.D RELATIONSHIP OF SCAP TO OTHER MANAGEMENT TOOLS

The SCAP process is crucial to Superfund program planning, tracking, and evaluation. As the Superfund program's central planning mechanism, it is interrelated with all Agency and Superfund program specific planning and management systems, including the GPRA annual performance plan, the Superfund budget, Agency Operating Plan, Memorandum of Agreement/Management Agreements and the Superfund workload models. GPRA annual performance goals are designed to reflect the strategic plans and the Agency's goals, objectives, and sub-objectives for the upcoming year. As such, SCAP serves as the Superfund Program's Memorandum of Agreement. In some cases, new categories are developed, or the projections for activities are adjusted, to match these goals.

II.D.1 Management Tools

Most of the Superfund program's budget is based on planning and accomplishment data recorded in WasteLAN. The operating year's budget is developed 18 months prior to its beginning. For example, data existing in the third quarter of FY 04 will be used to formulate the FY 06 budget. The site schedules reflected in WasteLAN serve as the foundation for determining out year budget priorities, such as the dollar levels to be requested in the budget. Because dollars for Fund-financed remedial actions (RAs), and remedial designs (RDs) dominate the overall Superfund budget, it is critical that the Regions identify RD and RA candidates and projected funding needs. Cost estimates for RAs should be derived using the draft feasibility study or record of decision estimates.

In FY 04/05, each Region's FTE distribution continues to be frozen at the FY 90 distribution ratio. While the freeze ensures that the total Regional Superfund resources are not affected, shifting of resources within the Region among the different program areas to support Agency/Regional program priorities may occur. All shifts will be based on the national budget (see Chapter III) and program priorities (see Chapter I and Appendices). Guidance for reprogramming between Program Results Codes (PRCs) are provided in the Agency's operating plan.

EXHIBIT II.1
FLEXIBILITY SCALE FOR BUDGETING/PLANNING

← **Minimum**		**Maximum** →
Operating Year Budget (FY 04)	**Planning Year Budget (FY 05)**	**Out Year Budget (FY 06)**
1. Operating Plan establishes funding ceiling (03/4)	2. Development of Operating Plan begins 6 Months Prior to FY and is based on prior years obligations and Regional projections for the upcoming years (Begins 04/2)	3. Formulations Begins 12-18 months prior to FY; largely dependent on Regional planning data in WasteLAN (Begins 04/3)
1. Semi-annual targets are set - Targets can be changed only through a written request from the Regional Division Director to the OERR, OECA, or FFRRO Office Directors.	2. Regional GPRA annual performance goals finalized in September	3. National targets are set based on schedules and estimated costs for program activities, which drive budget request
1. Additional funds can only be obtained through special requests	2. The budget is set but there is more leeway to make adjustments based on proven need	3. Budget is constrained based on resources cap imposed by AA and Administrator unless exception can be justified
1. Regions have flexibility within general budget and AOA structure to shift funds to meet priority activities	2. Regions request funds to meet GPRA annual performance and Regional pipeline goals	3. Maximum flexibility to design budget to optimize cross-program priorities
1. Mid-Year evaluation used to realign current year resources	2. Final GPRA annual performance goals set final resource levels (04/4)	3. N/A
1. Resources for response actions will be funded based on the Priority Panel decisions	2. Candidate sites are identified for the Priority Panel	3. N/A

EXHIBIT II.2
HQ/REGIONAL INTEGRATED PLANNING RESPONSIBILITIES

Regional Responsibilities	HQ Responsibilities
Manage projects to integrate Enforcement and Fund milestones and to ensure schedules and time lines are met	Establish a combined Fund, Enforcement, and Federal facilities hierarchy of program priorities in consultation with the Regions to be used in work planning and adjustment of targets
Involve the State, ORC, and finance offices in the planning process	Review integrated operating plans and site commitments proposed by the Regions prior to work planning
Provide accurate, complete, and timely project planning data in WasteLAN	Coordinate OSWER, OECA, DOJ, Financial Management Division (FMD), and the Office of Administration and Resources Management (OARM) activities throughout the planning process
Follow established planning procedures and requirements so that HQ has a common basis with which to evaluate Regional proposals (See Chapter III and the Appendices)	Work with Regional managers to formulate preliminary resource requests and determine how resources should be adjusted to meet program priorities
Assess Federal agencies environmental projects identified as part of the Office of Management and Budget (OMB) Circular A-11 process and the Federal Agency Environmental Management Program Planning Guidance (FEDPLAN)	Communicate with the Regions on changes/additions to schedules
Identify multi-media planning and cleanup opportunities	Provide funding consistent with each Region's active pipeline phases, shifting Regional resources if needed to support priority activities
Achieve program commitments	Develop policy and guidance in response to Congressional or Agency initiatives
Improve program efficiency by identifying potential unused funds and return them to HQ within reasonable time frame for redistribution	

II.D.2 Superfund Information Systems

Effective management of the Superfund program requires the availability of accurate information on Superfund sites throughout the country. CERCLIS was developed in the mid-1980s as an integrated system to hold national site assessment, remedial, removal, enforcement, and financial information. In FY 97, all Regions began using the third generation of CERCLIS, now called WasteLAN, to record Superfund planning and accomplishment information. (See Appendix E for more information on WasteLAN)

II.E OVERVIEW OF THE PLANNING PROCESS (SCAP)

The SCAP process generates data that fulfill the following functions:

- Tracking of accomplishments against GPRA annual performance goals and measures and program targets;
- Updating planning assumptions (schedules and funds) for the current FY;

- Developing planning data for the upcoming FY; and
- Providing data for out year budget planning purposes.

The SCAP planning process follows a semi-annual work planning schedule. The cycle begins in late March/April with a review of program progress and ends with a formal work planning session in October/November. Therefore, it is essential that planning and accomplishment data in WasteLAN remain current and up-to-date throughout the year and accomplishments be reported as soon as they occur. Site schedules and financial planning information should be reviewed and updated on an ongoing basis (at a minimum on a monthly basis). Note: All sites should be planned out through the deletion date as early as possible. By the time of the completion of a ROD, a site should have all planned dates entered into WasteLAN. As conditions change, the dates should be updated accordingly.

Following is a summary of the SCAP planning cycle for non-Federal facilities:

II.E.1 Planning Year

- *Third Quarter* - Regions continue their site planning using WasteLAN. The Regions should focus on their individual pipeline, the overall goals and priorities of the program as identified in the GPRA annual performance plan, and how they can achieve their portion of the national effort given proposed resources. In August, HQ issues a Call Memorandum that outlines the process and the procedures for the upcoming work planning sessions. The memorandum will include the finalized AOA structure, GPRA annual program performance targets and procedures to be used for developing the upcoming year's operating plan.

- *Fourth Quarter* - HQ pulls actual data for the current fiscal year and planning data for the next two FYs from WasteLAN on the fifth working day in September.

  Regions can assume in FY 04 that their removal budget will be held at the same level as FY 03 and is unaffected by this proposal. Also, funding for a new start and on-going remedial actions will be unaffected by this proposal.

  OERR reviews the CERCLIS/WasteLAN data and begins to develop a funding plan for the Remedial Action Advice of Allowance (AOA). OERR also uses these data to develop a draft Pipeline Operations AOA allocation that the regions use to develop initial pipline-related targets for the upcoming year. Because a reorganization at the headquarters level for managing the removal and homeland security programs is underway at the time of this writing, the process for planning for these programs will be revised and the SPIM updated during FY 2004.

  OSRE allocates the initial operating budget for technical enforcement for the upcoming fiscal year based on each region's share of the usage rate for enforcement activities. Legal enforcement funds are allocated equally between all ten regions. See Chapter 3 Section C for a more complete discussion on how funds are allocated.

- *October/November* - Regional work planning sessions will establish Regional budgets and targets (mid-year and end-of-year) and the operating plan (base budget plus increment) for the fiscal year.

II.E.2 Operating Year

- *Fourth Quarter (Planning Year) / First Quarter (Operating Year)* - Regional work planning sessions will establish proposed Regional budgets and targets (mid-year and end-of-year) and the operating plan (base budget plus increment) for the fiscal year. HQ will meet with the Division Directors to discuss the FY 04/05 Region-specific commitments and allocation of Regional funds based on the national GPRA annual program performance targets. The Superfund Federal Facilities Response Program will issue a memo that outlines Regional commitments and allocation of funds to both the Division Directors and the Superfund Federal Facility Program Manager.

- *Third Quarter* - At mid-year, HQ and the Regions will discuss Regional progress in achieving negotiated targets and Regional budget utilization (obligation rates). Based on these discussions, remaining funds will be allocated to the Regions to assure program targets are achieved. In some cases, this may involve a reallocation and shifting of resources among Regions. Enforcement extramural budget carryover amounts are calculated and the FY Regional enforcement budget allocation is finalized.

Regions are required to manage their funds and operate within the annual budgets established. Non-RA funds within the Region's budget must be reprogrammed to meet unexpected needs.

II.F CHANGE CONTROL REQUIREMENTS

Stability in the SCAP process through the year is essential to the success of planning and accomplishment reporting/evaluation procedures. The following procedures are used to control changes to items in SCAP:

- Changes (including additions or deletions) to targets, measures, definitions, methodologies, planning processes, accomplishment reporting, financial management, or any other process described in this Manual must be presented to the division director by the program office proposing the change, and receive the comments/concurrence of OSRE, OERR, FFRRO, and FFEO;

- All proposed changes must be sent to the Regions and all other program offices for review and comment prior to implementation; and

- The decision on whether to proceed with the proposed change must be documented in writing. Copies of all final decisions should be provided to all program offices and Regions. If the proposed change will be implemented, an addendum to the Superfund Program Implementation Manual may be issued.

II.G HQ/REGIONAL ROLES AND RESPONSIBILITIES

II.G.1 Maintaining Planning/Accomplishment Data in WasteLAN

Exhibit II.3 describes the HQ/Regional responsibilities for maintaining planning and accomplishment data in WasteLAN.

The Information Management Coordinator (IMC) is a senior position which serves as Regional lead for all Superfund program and WasteLAN systems management activities. The following lead responsibilities for Regional program planning and management rest with the IMC:

- Coordinate program planning, development, and reporting activities;
- Ensure Regional planning and accomplishments are complete, current, and consistent, and accurately reflected in WasteLAN by working with data sponsors and data owners;
- Provide liaison to HQ on SCAP process and program evaluation issues;
- Coordinate Regional evaluations by HQ; and
- Ensure that the quality of WasteLAN data is such that accomplishments and planning data can be accurately retrieved from the system.
- Ensure there is "objective" evidence to support accomplishment data entered in WasteLAN.

NOTE: Objective Evidence Rule: "All transactions must be supported by objective evidence, that is, documentation that a third party could examine and arrive at the same conclusion."

EXHIBIT II.3
HQ/REGIONAL SCAP AND WASTELAN RESPONSIBILITIES

Regional Responsibilities	HQ Responsibilities
Planning and scheduling all actions from site assessment and PRP search through NPL deletion Keeping planning and accomplishment data in WasteLAN up-to-date, including updating site schedules established at the ESI/RI stage and cost estimates for remedial actions when better planning data become available Reporting accomplishments in WasteLAN as they occur Entering and maintaining quarterly planning, budget, and accomplishment reporting for non-site specific activities Preparing change requests Tracking and maintaining the enforcement extramural budget and the Federal facilities budget Ensure there is "objective" evidence to support accomplishment data entered in WasteLAN	Negotiating final GPRA annual performance goals Determining the AOA based on planned activities in WasteLAN Responding to Regional requests for changes in plans through the change requests process Utilizing WasteLAN to obtain budget and other Superfund site information to respond to special requests for information and planning data Communicating with Regions and HQ offices regarding changes in budget, SCAP process, Superfund Program Implementation Manual, and other program guidance that will impact WasteLAN, and subsequently implementing these changes in WasteLAN Ensure there is "objective" evidence to support accomplishment data entered in WasteLAN by performing periodic reviews of a random CERCLIS data sample.

The Budget Coordinator serves as the Regional lead for all Superfund program resource activities. The Budget Coordinator:

- Coordinates the planning, development and reporting of resources;
- Coordinates the planning and execution of Regional priorities;
- Communicates and implements national and Regional Superfund budget policies;
- Helps IMC to ensure Regional resources associated with accomplishments are complete, current, and consistent, and accurately reflected in WasteLAN; and
- Provides liaison to HQ on program issues.

With the implementation of WasteLAN, two roles, Data Sponsor and Data Owners, were identified for improving the quality of data stored in WasteLAN. Data Sponsors include the Senior Process Managers or program offices in HQ. Both HQ and the Regions are Data Owners. Following are the responsibilities assigned to each of these roles:

- ***Data sponsors***
  - Identify data needs;
  - Oversee the process of entering data into the system;
  - Use data for reporting purposes;
  - Conduct focus studies of the data entered;
    NOTE: A "FOCUS STUDY" is where a data sponsor identifies a potential or existing data issue to a data owner (see below), IMC or other responsible source to determine if a data quality problem exists, and to solve the problem, if applicable. Focus studies can be informal via electronic messages.
  - Provide definitions for data elements;
  - Promote consistency across the Superfund program;
  - Initiate changes in WasteLAN as the program changes;
  - Provide guidance requiring submittal of these data;
  - Support the development of requirements for electronic data submission; and
  - Ensure there is "objective" evidence to support the accomplishment data entered in WasteLAN through identifying data requirements and checks to assure compliance by performing periodic reviews of a random CERCLIS data sample.
- ***Data owners***
  - Enter and maintain data in WasteLAN; and
  - Assume responsibility for complete, current, consistent, and accurate data.

- ***OERR Regional Centers***

  - Measure regional data entry quality and records management quality and assist regions with problems;

  - Report data problems to Data Sponsors and responsible teams;

  - Sample data quality and records management quality when visiting regions by tracking selected dates of a transaction in WasteLAN to the corresponding dates of the supporting paper document to ensure there is "objective" evidence to support accomplishment data entered in WasteLAN.

II.G.2 Program Evaluation

HQ and the Regions have different roles and responsibilities in Superfund program evaluation and management, as shown in Exhibit II.4.

EXHIBIT II.4
EVALUATION RESPONSIBILITIES

Regional Responsibilities	HQ Responsibilities
Meet semi-annual program targets and solve performance problems when they arise	Provide guidance to the Regions for the quarterly reporting, the mid-year assessment, the year-end assessment, and Regional reviews
Provide quarterly accomplishment and planning data to HQ through WasteLAN	Implement and report on follow-up action items from the Superfund mid-year assessment and Regional reviews
Maintain WasteLAN data quality at high levels for Superfund program and project management	Review performance data reported by the Regions and assist Regions having difficulties in meeting targets
Negotiate performance standards that provide individual accountability for targets	Conduct Regional reviews
Assess Federal agency needs identified during the FEDPLAN and OMB Circular A-11 processes	Continually assess program performance and analyze timeliness and quality of work
Participate in the Regional reviews	Recommend resource reallocation based on Regional needs and performance
	Assure that all staff are informed of results of performance reporting
	Compare Federal agency budget authorities, obligations, and outlays to monitor cleanup activities

The Superfund evaluation process provides managers with an opportunity to meet program objectives by:

- Examining program accomplishments;

- Analyzing and discussing issues that affect the successful operation of the Superfund program; and

- Initiating changes in program operations or reallocating/redirecting resources.

The strategy for assessing the performance of the Superfund program is comprised of the following:

- Establishing semi-annual and annual targets and planning measures;
- Quarterly reporting of response, Federal facilities, and enforcement/program accomplishments and planning measures through WasteLAN;
- Semi-annual performance evaluation; and
- Regional reviews.

This strategy enables management to recognize high performance, concentrate Superfund resources in those Regions that demonstrate success, and provide training and technical assistance to those Regions that are experiencing difficulties.

II.H PROCEDURES FOR ANNUAL TARGET SETTING

The process for developing GPRA annual performance goals and measures for a FY begins with the strategic plan. National annual performance goals are established to support the program's strategic plan and provide the basis for out year budget requests. All Regional targets are established in October/November only after work planning sessions with OERR, OSRE, FFRRO, FFEO, and the Regions. In the Regions, a joint review of commitments should be undertaken by the program office and ORC. The dates for pulling WasteLAN data that will be used in developing the proposed Regional operating plan, generating the Regional workload and budget, and work planning can be found in the Manager's Schedule of Significant Events presented at the beginning of this Manual.

The Region's focus in work planning should be on its individual pipeline (i.e., more site assessments or more construction completion oriented), the overall goals and priorities of the program including GPRA objectives and sub-objectives, and how it can achieve its portion of the national effort given proposed resources. HQ compares Regional plans with program goals and resource allocations. In addition, HQ reviews past Regional accomplishments, historical obligation trends, and planned durations/dollars to ensure that the Region is planning the appropriate amount of work given the dollars it is requesting. This provides HQ with a benchmark going into work planning on what the Region should be able to accomplish based on its unique pipeline status.

II.I WORK PLANNING

Regions are required to keep the planning and accomplishment data in WasteLAN current, complete, consistent, and accurate. Changes in planning information (schedules and funds) should be entered into WasteLAN within five days after the data owner [e.g., Remedial Project Manager (RPM)/On-Scene Coordinator (OSC)/Site Assessment Manager (SAM)] is aware of the need for the change.

II.I.1 Planning Process

Exhibit II.5 outlines the steps a Region must go through as part of its work planning responsibilities.

As a final check to ensure that planning data are current, complete, consistent, and accurate, Regions should routinely generate SCAP, Enforcement, and Audit reports. At an absolute minimum, reports should be generated prior to HQ development of the proposed operating plan and in late June for internal review of the planning data in WasteLAN. These planning data should reflect any adjustments made to the annual plan.

As designated, HQ pulls SCAP and Enforcement reports from WasteLAN. The data in these reports serve as the basis for HQ/Regional work planning. HQ will perform all work planning sessions based on the information in WasteLAN on these pull dates.

EXHIBIT II.5
PROCEDURES FOR FY 04/05 TARGET SETTING

Month	Regional Responsibilities	HQ Responsibilities
December/ January		Distribute draft SPIM for review and comment
April/May	Consult with States and ORC on FY activities	Prepare program and enforcement Regional operating plan based on average Regional obligations/tasking in the current year, projections for the upcoming years, and considering prior year expenditures. Analyze Regional pipelines
May/June	Update site schedules and funding needs based on plan, Regional pipeline, and national goals and priorities	
July/August/ September	Identify primary candidates for each target/measure activity by checking the target icon box on the Regional Planning screen. • Primary projects have the greatest likelihood of meeting schedules and are used to determine SCAP commitments. Participate in HQ conference calls on analysis of Regional plan Enter proposed commitments for work planning. Primary candidate counts become the basis for commitments once target lockout is selected. These counts can be modified and non site specific target/measure activity counts can be added via the Regional Planning estimates/targets screen.	Review Regional plans in WasteLAN and pipeline workload and budget Review past Regional accomplishments and planned durations/dollars Review Regional requests for budget reserve Conduct Regional conference calls on the results of the analyses Issue Call Memorandum outlining work planning process and procedures for work planning sessions

Month	Regional Responsibilities	HQ Responsibilities
October/ November	Participate in work planning sessions to establish final targets and budget. Participate in one day national meeting to communicate commitments and allocation of Regional funds based on national GPRA commitments Update primary candidate designations and budget data as necessary based on results of work planning sessions.	Participate in work planning sessions to establish final targets and budget Participate in one day national meeting to communicate commitments and allocation of Regional funds based on national GPRA commitments
November	Revise targets during open season based on appropriations	Revise Regional Enforcement operating plans Revise Regional Response Operating Plans

WasteLAN data quality problems that affect the SCAP report update shall be resolved prior to the work planning meetings. These problems are to be resolved on a Region-specific basis through telephone calls between HQ and the IMC or program manager.

II.I.2 WasteLAN Reports for Planning/Target Setting

Exhibit II.6 presents the WasteLAN reports used by HQ and the Regions in the establishment of Regional targets/measures. Following is a description of these reports:

- The *Site Summary Report* (SCAP-02) is used by EPA to display enforcement sensitive WasteLAN data for NPL and non-NPL sites.

- The *Response Financial Summary Report* (SCAP-04R), *Federal Facility Financial Summary* (SCAP-04F), and *Enforcement Financial Summary Report* (SCAP-04E) aggregate dollars by program area and provide both site-specific and non-site specific backup from WasteLAN. These reports should be used to compare the funding requests with the Regional budgets.

- The *Site Assessment Report* (SCAP-13) is used by EPA for reporting estimates, plans, and accomplishments for SCAP measures. The information provided by this report is used in conjunction with the SCAP-14 report to encompass the entire range of targets and measures.

- The *Superfund Accomplishments Report* (SCAP-14 and 14F) is used by EPA to track targeting, planning, and accomplishment actions in support of the Response, Enforcement, and Federal Facility programs.

- The *GPRA Report* (SCAP-15) is used by EPA to track GPRA performance goals and measures in support of the Response program.

- The *Reconciliation (SCAP-14 Audit) Report* (SCAP-16) is used to extract all potential candidates for a SCAP-14 category and provide the user with the ability to determine the way in which the action will be selected or eliminated based on the values or lack of values in the Select Logic columns.

- The *Cost Recovery Targeting Report* (ENFR-17) estimates potential targets for cost recovery.
- The *Measures of Success Report* (ENFR-62) provides the potential PRP oversight targets.

EXHIBIT II.6
PLANNING/TARGET SETTING WASTELAN REPORTS

SCAP-2:	Site Summary Report
SCAP-4E:	Enforcement Financial Summary Report
SCAP-4F:	Federal Facility Financial Summary
SCAP-4R:	Response Financial Summary Report
SCAP-13:	Site Assessment Report
SCAP-14/14 F:	Superfund Accomplishments Report
SCAP-15:	GPRA Report
SCAP-16:	Reconciliation (SCAP-14 Audit) Report
ENFR-17:	Cost Recovery Targeting Report
ENFR-62:	Measures of Success Report

II.J REGIONAL ACCOMPLISHMENT REPORTING

Accomplishments data are entered into WasteLAN by the IMC, RPM, OSC, SAM, or other designated program staff (i.e., PRP search, cost recovery). Data on accomplishments should be entered into WasteLAN within five working days of the action occurring. **Only accomplishments correctly reported in WasteLAN will be recognized by HQ.** If a Region feels that it has correctly recorded an accomplishment that is not showing in the WasteLAN reports for accomplishment reporting, please contact the appropriate HQ office.

Regions should perform data quality checks and make adjustments to WasteLAN if the database does not reflect actual accomplishments. In any event, Regions need to be sure the information reflected in WasteLAN is up-to-date and accurate.

Preliminary end-of-year accomplishments will be pulled on the fifth working day of September; it is the starting point for preparing for the end-of-year assessment in November. Since many senior managers and Congress request final accomplishments immediately following the end of the year, WasteLAN accomplishment reports will be pulled on the fifth and the tenth working days of October and reported in late October to mid-November (see Manager's Schedule of Significant Events at the beginning of this Manual for specific dates). This allows the Regions ample opportunity to review end-of-year financial data, ensure that all accomplishments are accurately reflected in WasteLAN, and determine which commitments were not met.

WasteLAN Reports for Accomplishment Reporting

Exhibit II.7 presents the WasteLAN reports HQ uses to evaluate Regional accomplishments. All are used for reporting and crediting accomplishments for targets and measures. Following is a description of these reports:

- The *SCAP Response Financial Summary Report* (SCAP-04R), *Federal Facility Financial Summary* (SCAP-04F), and *Enforcement Financial Summary* (SCAP-04E) aggregate dollars by program area and provide both site-specific and non-site specific backup from WasteLAN. These reports should be used to compare the funding requests contained in WasteLAN to the Regional budgets. Regions are prompted for "Approved" or "Alternate."

- The *Site Assessment Report* (SCAP-13) is used by EPA for reporting estimates, plans, and accomplishments for SCAP site assessment measures.

- The *Superfund Accomplishments Report* (SCAP-14 and 14F) is used by EPA to track targeting, planning, and accomplishment actions in support of the Response, Enforcement, and Federal Facility programs.

- The *GPRA Report* (SCAP-15) is used by EPA to track GPRA performance measures in support of the response program.

- The *Reconciliation (SCAP-14 Audit) Report* (*SCAP-16*) is used to extract all potential candidates for a SCAP-14 category and provide the user with the ability to determine the way in which the action will be selected or eliminated based on the values or lack of values in the Select Logic columns.

- *Settlements Master Report* (ENFR-3) - This report lists all settlements to date. Data are divided by settlement category and summarized by FY, Region, and remedy.

- *De Minimis Settlements Report* (ENFR-07) - This report lists all the de minimis settlements including the number of parties.

- *Administrative/Unilateral Orders Issued* (ENFR-25) - This report lists AOs and UAOs that have been issued.

- *Measures of Success Report* (ENFR-62) - This report is intended to allow Regions to report progress on measures of success relating to enforcement fairness and trust fund stewardship.

- *Environmental Indicators Report* (ENVI-01) - This report provides EPA Regional management with a tool to easily monitor environmental indicators (EI) data.

EXHIBIT II.7
PROGRAM EVALUATION WASTELAN REPORTS

SCAP-4E:	Enforcement Financial Summary Report
SCAP-4F:	Federal Facility Financial Summary
SCAP-4R:	Response Financial Summary Report
SCAP-13	Site Assessment Report
SCAP-14/14 F:	Superfund Accomplishments Report
SCAP-15:	GPRA Report
SCAP-16:	Reconciliation (SCAP-14 Audit) Report
ENFR-3:	Settlements Master Report
ENFR-07	De Minimis Settlement Report
ENFR-25:	Administrative/Unilateral Orders Issued
ENFR-62:	Measures of Success Report
ENVI-01:	Environmental Indicators Report

II.K HQ EVALUATION OF REGIONAL PERFORMANCE

Accomplishment data associated with targets/measures are pulled from WasteLAN at the close of business of the fifth working day of the quarter; **therefore, it is necessary that the Regions update their accomplishments data as accomplishments occur, but in no case later than quarterly prior to the fifth working day pull date. HQ management tracks and bases its evaluation of Regional program performance on these data**. The data are pulled on a selected number of key indicators of progress in the Superfund program (e.g., construction starts and completions, removal completions, site characterization starts, response settlements and referrals, RODs, and cost recovery activities). These numbers are the official numbers used in any reports of progress given to the Administrator, Deputy Administrator (DA), AAs, Congress, and the media. Detailed HQ management evaluation occurs at two points during the FY: after the second quarter (mid-year assessment) and after the fourth quarter (end-of-year assessment). (See Exhibit II.8.) In addition, HQ may conduct Regional reviews in FY 04/05.

II.K.1 Mid-Year Assessment

The purpose of the mid-year assessment is to evaluate the utilization of Regional programmatic budgets. Specifically, the mid-year assessment will be used to:

- Provide both HQ and the Regions with an opportunity to assess performance;
- Provide data to HQ and the Regions to make decisions on distribution of remaining budget;
- Consider the impact of Regional program performance on the Superfund pipeline;
- Work with Regions experiencing difficulty in meeting their targets; and
- Identify trends in program performance and adjust program management strategies accordingly.

On the fifth working day of April, second quarter SCAP data are pulled from WasteLAN. Following the mid-year assessments, OERR, FFEO, FFRRO, and OSRE Directors brief the AA SWER or AA OECA on the steps being taken to ensure the accomplishment of annual targets. To ensure that these actions are implemented, HQ will track follow-up items and reallocate resources. The results of the mid-year assessment can result in increases or decreases to third or fourth quarter AOAs based on Regional GPRA performance and obligation rates. The measure of a Region's ability to meet their targets will be considered in October/November when final proposed FY commitments and Regional budgets, respectively, are established for the year.

II.K.2 End-of-Year Assessment

Before the end of the fourth quarter, there is a preliminary pull for end-of-year accomplishments (the first week of September). This pull is used to project end-of-year accomplishments. It is important to stress that this is only a projection and that the actual pulls, on the fifth and tenth working days of October, are likely to be somewhat different than the projected numbers. Since many Superfund managers and Congress request final accomplishments immediately, Regions should make every attempt to update WasteLAN at the earliest possible date and, in no event, any later than the fifth working day after the end of the FY.

EXHIBIT II.8
THE REGIONAL EVALUATION PROCESS

1st Quarter	• Pull WasteLAN Reports on GPRA/Program Accomplishments
2nd Quarter Mid-Year Assessment	• Pull WasteLAN Reports on GPRA/Program Accomplishments and Internal Measures • Perform Regional Mid-Year Reviews • Evaluate Program Status • Brief Senior Management
3rd Quarter	• Pull WasteLan Reports on GPRA/Program Accomplishments • Report on Progress of Regions having difficulties meeting Targets
4th Quarter End-of-Year Assessment	• Pull WasteLAN Reports on GPRA/Program Accomplishments and Internal Measures • Develop Senior Management Reports Package • Evaluate Annual Performance Status • Evaluate Annual Performance and produce National Progress Report • Provide input into next FY Work Planning • Brief Senior Management Process

In November, HQ conducts the official end-of-year assessment. This assessment is an integrated analysis of program performance activities for the year. The purpose of the end-of-year assessment is to emphasize pipeline issues (e.g., slipped targets and their impact on commitments for the next year). ***Missed targets may have resource implications for the next FY.*** The end-of-year review also notes progress toward implementing strategies identified in the mid-year assessment, and identifies Regions that might require additional HQ assistance as the new FY begins.

HQ considers the end-of-year assessment in developing the final GPRA annual performance goals. In this way, the results of the end-of-year assessment have a double impact.

II.K.3 Management Reporting

The following sections provide a brief description of the reports available to support Superfund program management.

a. Superfund Management Reports

The implementation of an integrated WasteLAN data base and the improvement of WasteLAN data quality led to the development of a series of senior management reports. These management tools are designed to supplement conventional quarterly accomplishment reporting by providing a more comprehensive examination of program activity. The format and content of the reports has evolved over time to address a variety of project needs, providing EPA senior managers with summary graphic reports and backup site detail information.

The reports provide graphical representations of the status of targets and accomplishments, as well as analytic summaries of key aspects of the program including: status and duration of events; trend analysis of PRP involvement; cost recovery candidates; base closure joint indicators of progress; and the current status of negotiations, settlements, and litigation.

The reports, produced daily through Superfund eFacts, (currently in development), illustrate the progress being made by the Agency in both the movement of projects through the Superfund pipeline and in the trend toward increased involvement by PRPs. Superfund eFacts provides information on Site Assessment, Federal Facilities, Construction Completions, and SCAP and GPRA accomplishments. This data is available in regional, state, or national views.

Additional management reports produced by OSRE include:

- *Cost Recovery Targeting (ENFR-17)* - This report estimates potential targets for cost recovery.
- *ROD Amendment and RD/RA Negotiations Report (ENFR-22)* - This report is used to track RD/RA negotiation progress. The report is categorized into RD/RA negotiations started from signed ROD and No RD/RA negotiations started from signed ROD.
- *Ongoing RD/RA Negotiations Time Line (ENFR-11)* - This report is used to track the duration of ongoing RD/RA negotiations. The report shows categories of duration (e.g. between 60 and 120 days).

Additional management reports produced by FFRRO include:

- *BRAC Pipeline Report (BRAC-01)* - This report lists the pipeline actions within the current FY for any BRAC site.
- *Environmental Baseline Study (EBS) Report (BRAC-02)* - This report lists all Federal facility sites with EBS starts or completions within the FY.
- *Finding of Suitability to Transfer/Lease (BRAC-03)* - This report lists all sites for which EPA concurs on a finding of suitability for transfer/lease within the current FY.

b. Annual Reporting Requirements

Commencing March 31, 2000, and each year thereafter, the Agency is required to submit to the President and Congress a GPRA annual performance report that summarizes the program performance for the previous fiscal year. Specifically, each report will (a) review the success of achieving the program's objectives and sub-objectives during the fiscal year; (b) evaluate the annual performance plan for the current fiscal year relative to the performance achieved toward the performance objectives and sub-objectives in the fiscal year covered by the report; and (c) explain and describe where a performance objective/sub-objective has not been met, why it was not met, and those plans and schedules for achieving it.

II.L TARGET AND DEFINITION CHANGE REQUESTS

After targets have been finalized and funding levels developed, the SCAP process provides certain flexibility to modify plans during the year. Modifications to planned GPRA annual performance goals are termed change requests. ***Regional requests for changes to targets established in the annual plan must be forwarded in writing from the Regional Division Director to HQ OERR, OECA, or FFRRO Office Directors, as applicable, when the Region is unable to make a site substitution for a target.***

Any exceptions to the accomplishment definitions contained in the Appendices to this Manual are considered target definition changes. Regions also should note that changes made in WasteLAN to site schedules and other planning data will not automatically result in changes to targets.

Target changes that modify the Region's AOA require a financial change request. In these situations, the financial change request becomes the target change request. Chapter III outlines the change request procedures.

Although Regions have the flexibility to alter plans, they are still accountable for meeting the targets established at the beginning of the FY. Changes to commitments should not be made simply because targets will not be met. Regions should discuss with HQ during the mid-year reviews any issues that may affect the meeting of negotiated annual targets.

In some cases, however, changes to targets may be necessary and may be revised under the following conditions:

- Major, unforeseen contingencies arise that alter established priorities (i.e., Congressional action, natural disasters);
- Major contingencies arise to alter established Regional commitments (i.e., State legislative action);
- Measure or definition in system is creating an unanticipated negative impact;
- Major shifts in project approach; or
- Need to address newly identified site which represents a significant human health or ecological risk.

OERR, OECA, and FFRRO require that all target and definition changes be submitted to HQ no later than July. Optimally, such requests should be submitted during discussions with HQ during mid-year reviews.

Regions should not initiate any obligations against change requests until the HQ Office of the Comptroller (OC) and the Director of the appropriate office approve the revised AOA in IFMS. The site back-up in WasteLAN should be revised by the Region if the change is approved.

Under the Pipeline Operations AOA allocation methodology, Regions are allocated resources, in part, based on their targets for specific actions (e.g., RI/FS, RD, EE/CA) at specific sites. Because of this approach, Regions have flexibility to alter their plans regarding at which sites they conduct work, but they may not change the overall numerical target within each action category once the Pipeline Operations AOA resources are distributed among the Regions. The extent to which a Region meets or exceeds its target will have funding implications in the next year's distribution of Pipeline Operations AOA resources.

Maintaining the Planning Estimates/Targets

Regions are responsible for initiating the work planning process and for entering the preliminary and final targets into WasteLAN. Prior to work planning sessions with HQ, Regions can use the Regional Planning screen to identify which sites meet the planning logic as potential accomplishments for the upcoming FY. From this universe of sites (shown in red as Planning Data on the Regional Planning screen), Regions can identify primary candidate sites— those that are most likely to be accomplished. After identifying primary candidates (shown in blue on the Regional Planning screen), the Regions can then use the target lockout feature found on the Regional Planning screen to copy the primary candidate number to the Planning Estimates/Targets screen. This number is used as a starting point in identifying the Region's planning estimates/targets during work planning sessions. After work planning sessions are completed, Regions use the Planning Estimates/Targets screen to make any necessary changes. Once changes have been made and final targets/planning estimates are reviewed by HQ, HQ will "lock out" Regions (i.e. Regions will not be able to make any changes to these numbers). This final number is shown in red on the Accomplishments Tracking screen as the Planning Estimates/Target number. During the FY if changes have been made to the number of target commitments approved, HQ will "unlock" the target numbers allowing the Region to make the approved change(s), and then "relock" the screens.

In general, HQ does not require site-specific targeting. The four exceptions are Pipeline Operations AOA targets, Cost Recovery actions at sites with potential Statute of Limitations (SOLs) so that they will be addressed prior to the expiration of the SOL, *de minimis* settlements, and PRP Oversight Administration for each enforcement agreement. Changes to sites identified as targets for the latter three measures require HQ approval.

II.M SPECIAL REPORTING TOPICS

II.M.1 Site Assessment

As the nature of site assessments change, new reporting and accountability challenges to accurately portray the extent of State, Federal, and local government site assessment activities need to be addressed. Traditional CERCLA-reported site assessment accomplishments, including integrated assessments, should continue to be entered into WasteLAN when they occur. As Regions provide States flexibility in Cooperative Agreement applications and work plans by expanding the definition of types of assessment activities to be performed, the States also need to be accountable for the activities performed and provide quarterly or annual reports of the number of sites assessed, types or nature of assessments performed, and assessment results. Management systems at the State and probably Federal level will be needed to provide the accountability necessary and, also, to identify program accomplishments.II.M.2 Base Closure

II.M.2 Base Closure

EPA is providing resources to support the President's Fast Track Cleanup program. To facilitate EPA's justification of these resources, Regions are required to support several data points for closing bases. WasteLAN has been modified to include these items.

II.M.3 Pre-SARA Sites Initiative

The Superfund program has developed a Pre-SARA site initiative to promote the resolution of issues which have delayed the completion of construction at hundreds of sites across the country. Prior to the enactment of the Superfund Amendments and Reauthorization Act of 1986 (October 16, 1986), EPA listed 711 sites (including 4 Federal facility sites) on the National Priorities List. At the end of FY 2002, there were 203 Pre-SARA sites not yet construction complete or deleted (including one RCRA deferral site). OERR is now considering a tracking system to supplement WasteLAN, containing narrative information submitted by the Regions on the causes of delays over the past 1 to 2 decades, the obstacles which remain to completing the sites, and the Region's plan of action to overcome site-specific obstacles.

II.M.4 Mega Sites

Generally, a site is considered to be a mega-site if the combined extramural, actual and planned, removal and remedial action costs incurred by Superfund or by PRPs are greater than $50 million. The mega-site designation may be applied to any federal or non-federal facility NPL or non-NPL site. For the purposes of reporting in CERCLIS, a site is defined as a mega-site (MS) if:

- the cumulative value of the extramural capital costs of all selected remedies (as expressed in decision documents such as RODs, ROD amendments, or action memoranda) exceeds $50 million; OR
- the cumulative value of all PRP or Federal Facility actual and expected extramural capital costs (as memorialized in documents such as settlements, orders, or MOAs) for removal or remedial action response activities (excluding long-term response) at the site exceeds $50 million; OR
- the cumulative value of net actual extramural obligations for Fund-financed removal and remedial actions (excluding LTRA) at the site exceeds $50 million; OR
- the cumulative value of post-ROD (or post-action memorandum), removal and remedial action obligations (excluding LTRA) planned in CERCLIS for the selected remedies at the site exceeds $50 million; OR
- the cumulative value of any combination of the above costs exceeds $50 million.

A site is defined as a potential mega-site (MP) if the Region, using its best judgment, expects that the total costs of removal and remedial actions will exceed $50 million, but the documentation of actual or expected costs (e.g., through decision or settlement documents or actual obligations) does not currently exist. Once such documentation is developed, the site should be reclassified as MS. Conversely, if new information suggests that the site is not a mega-site, the designation of MP or MS should be removed. During annual workplanning discussions between Regions and Headquarters, the Regions will confirm these designations on a site-specific basis.

II.M.5 Superfund Alternative Sites (Please see Appendices A and B.)

II.N GENERAL WORK PLANNING AND REPORTING REQUIREMENTS

The following section discusses some general work planning and reporting requirements of the various Superfund offices.

II.N.1 Data Lockout on Historical Accomplishments

WasteLAN has a historical accomplishment lockout feature that logs and controls changes to Superfund data sensitive to Congressional inquiry. This feature uses the Accomplishment Change Log Screen and reports that list all changes that have been made to historical accomplishments data. A Regional manager for Superfund shall approve either in writing, or using the management review function in WasteLAN, each data change made by a Region to locked historical data. Only Regional IMCs, individuals designated by the IMC and Remedial Project Managers (RPMs), shall have access/authority to change/add/delete their own Region's data via a WasteLAN Smart Screen once written approval has been received. All other Regional personnel will be denied access to the change system. Written approval documents or records of approval via WasteLAN management review must be maintained by the IMC for the duration of the life cycle of the data changed (up to seven years).

Please Note: *In Regions that use Management Review,* RPMs will be able to make changes to prior year accomplishment data via the Accomplishment Change Log Screen. All changes made by RPMs will, however, need to be approved by the Regional Manager Reviewer.

Each Region will establish a policy or procedure to ensure that the appropriate people have knowledge of and approve of the change. All approval documents must bear a System Generated Reference Number or Document Number.

II.N.2 Data Validation and Verification

GPRA requires that an agency address its verification and validation procedures for performance data in the annual performance plan. WasteLAN data verification and validation procedures were incorporated as part of Superfund programs' submission to the EPA's annual performance plan.

A key component of WasteLAN verification/validation procedures is the Regional CERCLIS Data Entry Internal Control Plan. The control plans include: (1) Regional policies and procedures for entering data into WasteLAN; (2) a review process to ensure that all Superfund accomplishments are supported by source documentation; (3) delegation of authorities for approval of data input into WasteLAN; and (4) procedures to ensure that reported accomplishments meet accomplishment definitions. Also, Regions documented in their control plans the roles and responsibilities of key Regional employees responsible for WasteLAN data (e.g., Regional project manager, information management coordinator, supervisor, etc.), and the processes to assure that WasteLAN data are current, complete, consistent, and accurate.

With the increased emphasis on verifiable and validated data by GPRA, the program offices are requesting that the Regions review their current CERCLIS Data Entry Internal Control Plans and update their control plans according to the requirements listed above.

In addition, Regions are required to submit to their Regional Superfund Records Center the document that constitutes or justifies an accomplishment date (actual start or actual complete) recorded in WasteLAN. (Documentation requirements for these dates can be found in the Appendices to this Manual in the "Definition of Accomplishment" section of the applicable target or measure.) When submitting the documentation to its record center, the Region should provide the target/measure category and the WasteLAN Operable Unit (OU)/action name/sequence number. The Regional Records Center is to include these SCAP data with the document index data, and provide the document index number from its tracking system for entry into WasteLAN associated with the applicable accomplishment date.

II.N.3 Action Lead Codes

Action lead codes identify the entity performing the work at the site. Exhibit II.9 shows the valid project/action lead codes in WasteLAN.

A lead code must be placed in WasteLAN for all Actions. Only the leads that are valid for the chosen Action can be entered. Leads are not required for SubActions. Regions have the ability to code the lead for project support activities (e.g., community relations, support agency assistance, etc.) based on Regional preference. All enforcement actions (e.g., orders, decrees, PRP searches, etc.) performed by EPA should have a lead of "FE" (Federal Enforcement). All enforcement actions conducted by the State should have a lead of "SE" (State Enforcement). WasteLAN should not contain planned obligations for projects with "SR" or "SN" leads. No funds will be provided for activities with these leads.

The Agency acknowledges that States can and have assumed the lead role in reaching an agreement with the PRPs for response activities at NPL sites without negotiating a cooperative agreement or other formal agreement with EPA (SR-lead). However, the NCP has determined that in the absence of a formal agreement the State will not be officially recognized as the "lead agency" for the project and EPA will not concur on the remedy selected.

EXHIBIT II.9: ACTION LEAD CODES IN WASTELAN

Lead	Definition
F	Fund-financed response actions performed by EPA (applies to response actions)
RP	PRP- financed response actions performed by the PRP under a Federal order/ CD (applies to response actions)
S	Fund- financed response actions performed by a State. Money provided through a Cooperative Agreement (CA) (applies to response actions)
PS	PRP-financed response actions performed by PRP under a State order/ CD with PRP oversight paid for or conducted by EPA through an EPA CA with the State, or, if oversight is not funded by EPA, a state Superfund Memorandum of Agreement (SMOA) or other formal document between EPA and the State exists which allows EPA review of PRP deliverables (applies to response actions)
SN	State-financed (no Fund dollars) response actions performed by the State (applies to response actions)
SR	PRP response under a State order/ CD and no EPA oversight support or money provided through a CA and no other formal agreement exists between EPA and the State (applies to response actions)
CG	Work performed by the Coast Guard - Limited to removals (applies to response actions)
MR	Work performed by PRP under a Federal CD with an agreement that the Fund will provide some reimbursement to the PRP (preauthorization for mixed work). (applies to response actions)
SE	Enforcement actions performed by a State. Money provided through a CA or, if not funded by EPA, a comparable enforcement document exists (applies to RODs and enforcement actions)
FE	Enforcement actions performed by EPA or work done by enforcement program at private or Federal facilities sites (applies to RODs and enforcement actions). Historically (Pre-FY 89) applied to RI/FS and RD response actions.
EP	Response actions performed by EPA using in-house resources
FF	Response actions performed by the Federal facility with oversight provided by EPA and/or the State at sites designated as Federal facilities on the NPL (also applies to RODs at Federal facilities)
TR	Indian Tribal Governments
CO	Community Organization (Only valid for Community Involvement Activities)
SD	State Deferral is a PRP- or State-financed response action at a non-NPL or proposed NPL site overseen or conducted by the State pursuant to a deferral agreement with the Region.
SC	State ROD with EPA concurrence
SW	State ROD without EPA concurrence

Lead	Definition
SA	PRP financed actions from a special account performed by EPA, where the majority[1] of funding is disbursed from a special account (applies to response actions) .
SG	PRP financed actions from a special account performed by the United States Coast Guard, where the majority[1] of funding is disbursed from a special account - Limited to removals (applies to response actions) .
ST	PRP financed actions from a special account performed by tribal governments, where the majority[1] of funding is disbursed from a special account (applies to response actions)
SS	PRP financed actions from a special account performed by a state, where the majority[1] of funding is disbursed from a special account. Money provided through a Cooperative Agreement (CA) (applies to response actions)

II.N.4 Lead Changes

A takeover or lead change occurs when the entity performing a response action changes after the action has started and credit has been given. Typically, this occurs when a settlement with the PRP had been reached after the action started. It may also occur when the Fund assumes an RP-lead project because of non-compliance with an Administrative Order (AO) or Consent Decree (CD).

In order to avoid delays resulting from PRPs assuming the lead during a discrete phase of the project (a takeover), a policy has been established that limits lead changes from EPA to PRPs in the middle of a phase of the Superfund process, except in situations where the change will not cause undue delays (OSWER Directive 9800.1-01, *Limiting Lead Transfers to Private Parties During Discrete Phases of the Remedial Process,* November 14, 1991). The policy applies to lead changes from EPA to PRPs only, not EPA takeovers of PRP work or lead changes involving States.

It is expected that much of the early site assessment activities will be Fund-lead. However, response lead changes (i.e., changeovers) can occur at any of the following points in the process:

- Prior to development of an EE/CA for a NTC removal action;
- Prior to the ESI/RI or RI/FS;
- Prior to the FS if the RI and FS are being done separately;
- After the ROD is signed and prior to beginning the RD or RA; and
- Prior to RA contract solicitation, when funding the RA would have significant implications for the Fund and when no significant delays will occur.

[1] Majority is defined to mean that the contribution from the Special Account for the total response cost (including direct and indirect costs) would meet or exceed the amount contributed by the largest non-PRP entity (i.e., EPA or State, where applicable). For example for a remedial action, based on the total estimated response cost, if 50% of that cost is derived from a Special Account, and 45% of the response cost is paid for out of Fund monies, and the State pays the remaining 5% share of the response cost, the majority of the response cost is being paid out of the Special Account. The appropriate use of Special Account funds is provided in the "Guidance on Key Decision Points in Using Special Account Funds" dated September 28, 2001.

When circumstances warrant passing the lead to PRPs during a phase of cleanup, steps should be taken to minimize potential causes of delay. For example, if PRPs assume the lead during the RI/FS, they should be given a limit of 60 days to enter into an Administrative Order on Consent (AOC) for performing the work.

If a PRP is allowed to take over a response action after dollars have been obligated, the Region should retain the funds needed for oversight of the entire PRP action and deobligate the rest. Funds that are deobligated may be replaced in the Region's AOA pursuant to the Agency's deobligation policy.

When dollars were originally obligated for Fund-financed actions and a takeover occurs, Regions will have to request a change in the account number through their Regional Financial Management Office (FMO). The Action code within the account number changes if the Agency is acting in an oversight role as opposed to performing the response action.

RP-lead projects that are deficient or where the PRPs are recalcitrant may be addressed by the response program. If the project requires substantial Fund involvement to correct, it should be coded as a takeover in WasteLAN.

If a takeover of an action does occur, a new Action must be created in WasteLAN. A takeover does not create a new OU. The completion date of the original Action must be the same as the start date of the new Action. Takeover/Phased Indicators must be entered with both Actions. The "Original Action Takeover (TO)" indicator is used to flag the original Action which has the change in lead, whereas a "New Action resulting from Takeover (TN)" indicator is used to flag the new Action.

On rare occasions, an action that has been taken over requires an additional lead change. For example, EPA reaches settlement with the PRPs after a Fund-financed action has begun. After the PRPs start work, EPA experiences problems with the PRPs in meeting deadlines or in the quality of the work. As a result, EPA makes a decision to takeover the PRP-financed action. The steps to be taken to indicate this scenario in WasteLAN are as follows:

1) A new Action is added to WasteLAN at the same OU. In our example, a new combined RI/FS with a 'F'- lead would be added.

2) The start date of this new Action is the date of the takeover.

3) A Takeover/Phased Indicator of "New Action Resulting from Takeover (TN)" is entered with the new Action.

4) The completion date of the latest action that was taken over is the same as the start date of the new Action (date of the takeover).

5) The Takeover/Phased Indicator of the latest action that was taken over is changed from a "New Action Resulting from Takeover (TN)" to a "Takeover of an Action Taken Over (TT).

Exhibit II.10 provides an example of the WasteLAN coding. In this situation, no changes are made to the original action.

EXHIBIT II.10
CODING OF TAKEOVERS

Action Takeover							
OU	**Action Name**	**Seq.**	**Lead**	**Actual Start**	**Actual Comp**	**Takeover/ Phased Indicator**	**Comments**
01	Combined RI/FS	1	F	8/1/97	9/1/97	TO	Fund-financed Action being taken over by PRPs
01	PRP RI/FS	1	RP	9/1/97	12/1/97	TT	PRP Action initiated and taken over by Fund
01	Combined RI/FS	2	F	12/1/97		TN	Fund-Financed Action initiated

II.N.5. Anomalies and Phased Projects

Anomalies are those projects that do not fit the normal definitions of pipeline actions. Anomalies can be those projects that 1) do not receive SCAP credit, but still need to be tracked, or 2) occur out of the ordinary pipeline progression.

An example of a SCAP anomaly occurs when different entities conduct FS work simultaneously that leads to a single ROD. Since it is inconsistent to give credit for more FS starts than completions (the Agency would have to explain why FS work is not leading to a ROD), only one FS can receive credit for a start and completion. These projects are coded under the same OU with multiple sequence numbers and those FSs that will not receive credit are given a Takeover/Phased Indicator of "Other Start and Completion Anomaly (OA)."

At the RD and RA stages, a project may be phased or time-sequenced to accelerate the cleanup effort. Phasing is complementary to OUs. Whereas OUs break large, complex projects into smaller, more manageable work elements, phasing is a method to accelerate the implementation of the OUs. Phasing manipulates the internal steps required to complete each OU, thereby optimizing the overall schedule; for example, a RA that requires site clearing prior to constructing an incinerator. The clearing would be one phase of the RA, while the construction of the incinerator would be a second phase.

Regions enter a separate RA for each phase. Phases of each response action are shown in WasteLAN by the use of the Takeover/Phased Indicators of Phased Start (PS) and Phased Complete (PC) or Phased Start and Completion (PB) (See Exhibit II.11). Funding required for each of the phases is tracked against the phase. However, the duration of the project is calculated from the date the first phase started to the date the last phase is completed.

EXHIBIT II.11
REMEDIAL EVENTS, ANOMALIES, AND PROJECT PHASING

OU	Action Name	Seq.	Lead	Plan Start	Plan Comp	Takeover/ Phased Indicator	Comment
01	PRP RI/FS	1	RP	96/2	98/3		
01	PRP FS	1	RP	97/3	98/3	OA	No Credit for Start or Completion
01	PRP FS	2	RP	97/3	98/3	OA	No Credit for Start or Completion
01	R01	1	FE		98/3		
	AN01						
01	RD1		RP	99/1	00/2	PC	PHASE I
01	RD2		RP	99/2	00/3	PS	PHASE II
01	RA1		RP	00/3	01/1	PC	PHASE I
01	RA2		RP	00/3	04/1	PS	PHASE II

II.O Subject Matter Experts

Exhibit II.12 identifies all SCAP report contacts. Exhibit II.13 identifies the subject matter experts for Chapter II Program Planning and Reporting Requirements.

EXHIBIT II.12 SCAP REPORT CONTACTS
(REPORTS OWNER: R WHITE)

Designation	Title	Report/Data Owner
SCAP-2/11/12	Site Summary Report/FOIA	Robert White, (703) 603-8873 Margaret Brown, (703) 603-8876 et al
SCAP-4E	Enforcement Financial Summary (Enforcement maintains this report)	Alice Ludington, (202) 564-6066
SCAP-4F	Federal Facility Financial Summary	Marie Bell, (703) 603-0050
SCAP-4R	Response Financial Summary Report	Willie Griffin, (703) 603-8911

Designation	Title	Report/Data Owner
SCAP-13	Site Assessment Report	Randy Hippen, (703) 603-8829 Juanita Standifer, (202) 566-2764 Terry Jeng, (703) 603-8749 James Maas, (202) 566-2778
SCAP-14	The Superfund Accomplishments Report	Robert White, (703) 603-8873 Dan Dickson, (202) 564-6041 Renee Wynn, (703) 603-0049 Marie Bell, (703) 603-0050 et al
SCAP-15	GPRA Report	Janet Weiner, (703) 603-8717
SCAP-16	Reconciliation SCAP 14 Audit Report	Robert White, (703) 603-8873 et al

EXHIBIT II.13 SUBJECT MATTER EXPERTS

Subject Matter Experts	Subject Area	Phone #
Sharon Blandford Art Flaks	Chapter 2 Leads	(703) 603-8752 (703) 603-9088
Erin Conley	E-facts	(703) 603-8928
Mark Mjoness	Emergency Response/Removal	(703) 603-8727
Dela Ng	Enforcement	(202) 564-6073
Emily Johnson	GPRA	(703) 603-8764
Alan Youkeles	PARM	(703) 603-8784
Melanie Hoff	Program Planning/EI	(703) 603-8808
Matthew Charsky	RODs/Remedy Selection	(703) 603-8777
Hans Waetjen	RODs/Remedy Selection	(703) 603-8906
Robert White	SCAP Reports Owner	(703) 603-8873

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