

**Discussion Points:**



**Related Instructor Activity:**


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## Discussion Points:

### Hazardous Waste Site Clean Up RPMs

- Lead Agency
  - DoD
  - DOE
  - DOI (Federal Land Management)
  - EPA
- Regulatory
  - EPA
  - State
- Roles and responsibilities detailed in the National Contingency Plan (NCP)
  - Title 40: Protection of Environment, Part 300, Subpart B- Responsibility and Organization for Response
  - § 300.120 On-scene coordinators and remedial project managers: general responsibilities
- While there are commonalities between the roles and responsibilities of all RPMs, in general responsibilities will vary according to organizational affiliation.

We'll be taking a look at similarities and functional differences of each . . .



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## Related Instructor Activity:

For Federal Facility waste sites, there are typically Lead Agency and Regulator RPMs involved.

Slides will review responsibilities of each type.

It should be noted that many tasks are regularly assigned to contractors, however the ultimate responsibilities for the site remain with the RPMs.

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## Discussion Points:

### But first, a word about our Contractors . . .

- While ultimate responsibility for a project resides with the RPM, typically project tasks are performed by contractors and subcontractors.
- Contractor tasks may include
  - Planning and QAPP development support
  - Sampling and analytical support
  - Data review, validation, verification
  - Data analysis and reporting

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## Related Instructor Activity:

## Discussion Points:

### Lead Agency RPM Responsibilities

- Represents Organization Responsible for Remediation
- Accountability
  - “The” person accountable for planning, safety, scope, budget, quality, and project schedule
  - Accountable for establishing/meeting stakeholder expectations *while protecting financial interests of Lead Agency*
  - Responsible for compliance of site work tasks per governing state and federal regulations
  - Responsible for conformance with **UFP QAPP** requirements
- Management
  - Manages overall project team including budgeting and planning
    - Oversees team members
    - Ensures all project objectives are met
  - Planning and Scoping meetings
  - Directs team to develop and achieve appropriate milestones for project
  - Periodically reports to Senior Management regarding individual project status and any material changes to schedule and/or budgets



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## Related Instructor Activity:

Throughout presentation, use the term “typical responsibilities” and discuss that responsibilities will vary with each project.

### **Title 40: Protection of Environment**

#### [PART 300—NATIONAL OIL AND HAZARDOUS SUBSTANCES POLLUTION CONTINGENCY PLAN](#)

#### [Subpart B—Responsibility and Organization for Response](#)

§ 300.120 On-scene coordinators and remedial project managers: general responsibilities.


DoD components “partner” remediation with other Agencies and therefore the “Chair” may rotate to different Agencies.

The point here is that it is an RPM and NOT the CONTRACTOR who leads/directs the scoping meeting.

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## Discussion Points:

### Lead Agency RPM Responsibilities in Project Planning



- **Assembles Project Team**
  - Includes technical personnel (data generators, data users, QA personnel)
  - May include local stakeholders, police, fire, etc.
  - Size of the project team should reflect the complexity of the project
- **Convenes scoping meetings to define:**
  - Project objectives/Environmental questions
  - Environmental decisions that will be made with the collected data
  - Project action limits
  - Type and quantity of data
    - How "good" data must be (data quality) to support the decisions that will be made.  
**Note:** project team must first define the quality of the data needed by setting data acceptance limits for the project, Only after this can the team can select sampling and analytical methods to achieve the project data objectives.
  - Boundaries of project (temporal, budgetary, geographic)
  - Schedule

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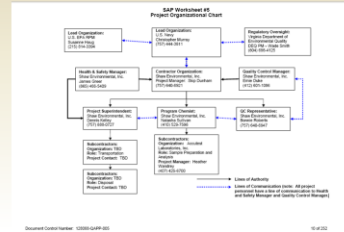
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## Discussion Points:

### Lead Agency RPM Responsibilities in Project Planning, *continued*

- **Develop Organizational Plan for Project that includes:**
  - Regulators
  - Technical experts
  - Data users (including risk assessors)
  - Field Contractors/Subcontractors
  - Analytical Services Contractors/Subcontractors
  - Data Reviewers
- **Develop Communication Plan**
  - Keeps project team advised as to changes to tasks, procedures, schedule and budget
    - Regulators
    - Project team
    - Contractors and subs



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## Discussion Points:

### **Lead Agency RPM Responsibilities in Project Planning,** *continued*

- Documents results of planning in QA Project Plan in accordance with UFP QAPP guidance
- Submits QAPP to Regulators
  - Ensures questions/comments from regulators are addressed and QAPP approved prior to start of field sampling
  - Ensures QAPP addenda, amendments, and revised SOPs are submitted for review and approval
- Distributes QAPP to project team. Ensures current version, SOPs and addenda are made available and that superseded versions are properly archived

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## Related Instructor Activity:

## Discussion Points:

### Lead Agency RPM Responsibilities in Project Implementation

- **Implements QAPP**
  - Directs contractor tasks
  - Resolves issues
- **Oversight and Assessment**
  - Ensures routine inspections and planned assessments are performed
  - Identifies the need for additional technical audits
  - Directs effective and documented corrective actions
  - Identifies and tracks work (sampling, analysis) that must be redone
- **Data Review**
  - Verification and validation of field and testing data
  - Data assessment for statistical assumptions, if applicable
  - Draft report on usability assessment



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## Discussion Points:

**Lead Agency RPM Responsibilities for Data Use**

- Convenes team members to discuss issues and potential impact on data usability and achievement of project objectives
- Evaluates team input, determines usability of project data, and issues final report



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## Discussion Points:

### Regulatory RPM (EPA) Responsibilities

- Acts as Agency Representative
- Actively participates on Project Team
- Reviews QAPPs/provides comments/approves or concurs on acceptability of document
- Ensures outstanding Agency issues are addressed prior to start of field activities
- Provides Agency project oversight
- Provides guidance and direction
- Enforces regulations
- Periodically reports to Senior Management regarding project status and material changes to schedule and/or budget



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## Related Instructor Activity:

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## Discussion Points:

### Regulatory RPM (EPA) Responsibilities

- Participates in citizen-related activities, including presentations at public meetings
- Provides technical assistance in preparing information sheets and responsiveness summaries and responds to public inquiries
- Performs documented audits as needed
- Participates in discussion and review of draft usability reports
- Reviews/Accepts/Concurs on Final Project Reports



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## Related Instructor Activity:

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## Discussion Points:

### Regulatory RPM (State) Responsibilities

- Acts as State Agency Representative
- Actively participates on Project Team
- Reviews QAPPs/provides comments/approves or concurs on acceptability of document
- Enforces state clean up requirements and regulations
- Protects interests of State and local communities
- Participates in citizen-related activities, including presentations at public meetings



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## Related Instructor Activity:

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## Discussion Points:

### Regulatory RPM (State) Responsibilities, *continued*

- Provides technical assistance in preparing information sheets and responsiveness summaries and responds to public inquiries
- Provides guidance and direction
- Provides project oversight
- Performs documented audits as needed
- Participates in discussion and review of draft usability reports
- Reviews/Accepts/Concurs on Final Project Reports

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## Related Instructor Activity:

## Discussion Points:

### Advantages of the Team Approach

- **Remedial work is full of surprises!**
  - Open communication helps deal with them in timely, effective manner, w/regulatory concurrence
- **Responsible Participation**
  - Identifying potential issues early in process (e.g., State clean-up standards)
  - Maintaining open communication throughout a project
  - Quickly reaching consensus on issues that arise
  - Listening to others' ideas
- **Formal Partnering Approach (DoD-specific)**
  - Team approach may be formalized
  - Typically, level of participation is project specific
  - In general, some level of team planning is beneficial

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## Related Instructor Activity:

## Discussion Points:

### Advantages of Team Approach, continued

- **Facilitates/speeds up communication**
  - Regular team meetings
  - Cooperative environment
  - Phone calls
  - Conference calls
  - E-mail
- **Technology Selection**
  - Identifying and using innovative technologies
  - Choosing effective technologies that eliminate future actions
  - Choosing efficient technologies that reduce cleanup cost

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## Related Instructor Activity:

## Discussion Points:

### Contractor Project Manager Responsibilities for Scoping Meetings

- As directed by Lead Agency RPM, prepare UFP QAPP documents (e.g., maps, worksheets, etc.) for:
  - project tasks that are agreed upon (e.g., analyte list, SOPs, validation procedures)
  - previously known project information (e.g., distribution list, project management organization)
- As directed by Lead Agency RPM, provide scoping meeting presentation of site background information and proposed “agreed upon” site activities

**Note:** Project activities and information that require agreement/consensus will be discussed at the Scoping Meeting. Worksheets associated with “sticky” issues will be completed after discussion and/or agreement

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**Discussion Points:**



Any questions or comments before we begin our Scoping Meeting video?

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