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Subject: Data Management within the Remedial Program

Dear Remedial Program Staff,

Recent experiences at some high profile sites in Region 5 have caused EPA and the Superfund Division (SFD) to reevaluate some practices in the Remedial Program, including how we manage the data we've collected. Incidents such as the Enbridge oil spill, the Flint water response, and the USS Lead response are high visibility situations where there was, and continues to be, a need to quickly catalog, interpret, and publish very large amounts of data. These data are usually generated by different organizations, collected from different types of media, and have been stored and presented in different ways, which can create confusion or lost time. Therefore, we must begin to evaluate and standardize the ways we receive, store, and process data to make these actions more efficient and consistent.

To achieve this, I am making it a standard SFD practice that all data be received in the Electronic Data Deliverable (EDD) format consistent with the software that we will be using to store, sort, and analyze the data. Remedial Project Managers (RPMs) and Site Assessment Managers (SAMs) should now ensure that language requiring data to be submitted in an EDD format is placed into all enforceable agreements and contracting document Statements of Work. The details associated with how to administer and use data will be refined as part of a Data Management Plan tailored to the specific software package that is being used at your sites. The proper data software will allow RPMs and SAMs to sort data, flag important results, block Personally Identifiable Information from publication, plot results on site maps and figures, and identify sampling results that call for timely referral to the removal program. In the near future, SFD will schedule training for RPMs and SAMs on EDD requirements, how to work with your potentially responsible parties (PRPs) and contractors to get site data in the format you need, and how to perform basic data manipulation steps.

We have already convened a data management work group to improve our data management processes in the Removal Program. Our FIELDS group is working with On-Scene Coordinators and our Removal contractors to develop a suite of Data Management Plans and templates for the removal program that discuss how to receive and administer data from PRPs and contractors in the proper EDD format to meet our needs. I would like one or two RPMs to join this data management effort with FIELDS and the Removal Program to bring the Remedial Program's perspective to the group and to help develop a suite of Data Management Plans and templates for the Remedial Program.

Another important aspect of data management is our ability to quickly communicate results to affected communities and their residents. RPMs and SAMs should always strive to share information quickly and be open to discussing sampling data with affected parties. This includes sharing sampling results with communities and residents immediately after the data have been validated, and not waiting until sampling reports and other site documents are completed. It could also include sharing un-validated results if the data reflects a situation that may present an immediate endangerment to the community.

Our experiences at sites like Flint and USS Lead have demonstrated just how important it is to our mission to evaluate data, present data in a clear and visual manner, and share data with communities quickly. I am committed to identifying ways of more efficiently and consistently receiving and sharing data in the remedial program. I am confident that we can develop the skills and procedures necessary to fulfill our collective responsibility to share information with the public in a timely manner, while at the same time accomplishing our mission of protecting public health and the environment.

Thanks. Doug

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