

National Remedy Review Board (NRRB) Process Changes

The Superfund Task Force recommendation 4 focused on promoting national consistency and review and approval of proposed remedies, including the analysis and approval of remedies that are subject to review. A national workgroup assessed challenges associated with the board, and as a result of the assessment EPA identified opportunities for improvement to the NRRB process. The resulting changes provide earlier and more frequent engagement during development of the remedial investigation/feasibility study (RI/FS). A summary of the changes are below.

The NRRB underwent extensive assessment and revision to address challenges encountered in recent years and changes the interactions between the region and the Board. The screening of upcoming remedies will no longer be based on potential cost. There will be a process for identifying candidates that will involve both EPA headquarters and the Regions. The final decision regarding candidates that will be in the NRRB process will be made by the Assistant Administrator of the Office of Land and Emergency Management. The primary NRRB review will be a more focused, technical review that will occur during the FS scoping stage. That will be followed by a NRRB review of the detailed alternatives analysis if needed. Lastly, as appropriate, the NRRB Chair and OSRTI regional HQ remedy coordinator will review the proposed plan (PP) and record of decision (ROD). This will allow for the NRRB to review the draft remedial investigation while working with the region to develop the suite of remedial alternatives considered in the FS and provide feedback through remedy selection. The revised process is expected to result in a more collaborative remedy development process that allows for early stakeholder engagement and improved national consistency. The following chart provides a summary of the primary changes to the NRRB process.

Element	Before	After
Site Selection	Primarily based on the anticipated cost of the preferred alternative (last set at over \$50M)	Nomination process based on technical and programmatic considerations. Regions and OSRTI nominate sites for OLEM to confer on for NRRB review.
Number of Meetings	One meeting	Two meetings: 1. Board Review Team Meeting (in person meeting) Advisory Team Review (remote meeting)
Timing of Meetings	Prior to publication of Proposed Plan	Earlier in the remedy development process: 1. Board Review Team meeting at Feasibility Study Scoping Advisory Team Review meeting at detailed alternatives analysis stage

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Meeting Purpose	Evaluate preferred alternative with focus on cost effectiveness and compliance with Agency guidance/policy	Identify concerns regarding remedial investigation, compliance with Agency guidance/policy, inform scoping of remedial action objective and development of suite of alternatives.
Annual Meeting/Report	N/A	NRRB will meet annually to produce a report on programmatic lessons learned overarching issues identified and resolutions for sites reviewed the previous year. This report will form the basis for OSRTI recommendations to the OLEM AA regarding areas that may benefit from clarification, policy, guidance, or training to improve the Superfund program's overall effectiveness.
Accountability	Regional response. No formal elevation process.	Formal elevation process to address issues and improve accountability.