

US EPA ARCHIVE DOCUMENT

# Overview of Remedial Design Process

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- ◆ Definition of RD
- ◆ Various leads may undertake RD
- ◆ Key components of RD



# Scoping

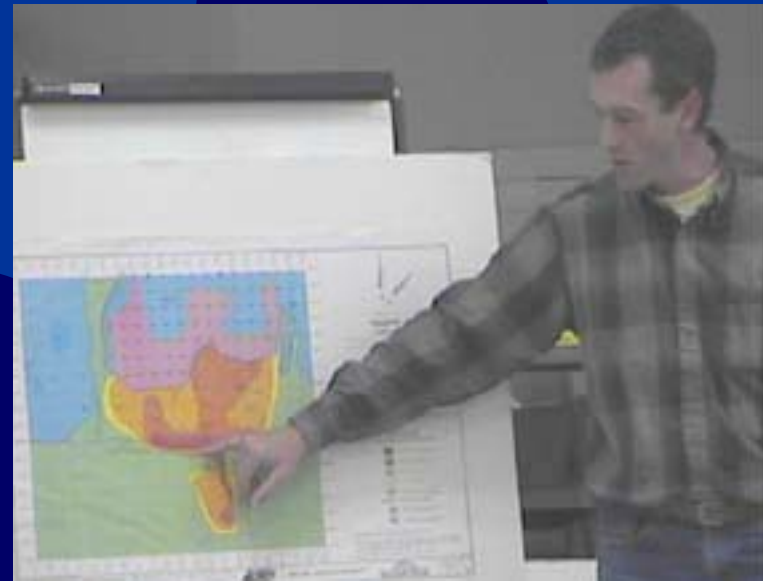
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- ◆ RD begins with project planning
- ◆ Scoping the RD involves several planning activities
  - » Establish the TRT
  - » Coordinate activities with the state
  - » Collect predesign information
  - » Prepare the project management plan
  - » Identify constraints on the project

# Tasking the Designer

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- ◆ Determination of the lead
- ◆ RPM's role
  - » Fund-lead
  - » Enforcement-lead
  - » USACE-lead
  - » State-lead
  - » Federal facility-lead
- ◆ Using standard tasks



# Predesign Submittals and Treatability Studies

- ◆ Standard submittals before field work begins
  - » SMP
  - » HASP
  - » ERP
  - » FSP
  - » QAPP
- ◆ Treatability studies may be performed if necessary



# Design Submittals: Preliminary Design Phase

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- ◆ Design is 30 percent complete
- ◆ Components of the preliminary design
  - » Design criteria report
  - » Basis of design report
  - » Preliminary drawings and specifications
  - » Results of value engineering screening
  - » Preliminary RA schedule
  - » Preliminary RA and O&M cost estimates
- ◆ Review of preliminary design submittals



# Design Submittals: Intermediate Design Phase

- ◆ Design is 60 percent completed
- ◆ Optional phase
- ◆ Includes revision of deliverables
- ◆ Focus of review
  - » ROD requirements
  - » Biddability, constructability, operability
  - » Pollution controls
  - » Construction practices
  - » Accuracy of calculation



# Value Engineering

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- ◆ A specialized cost-control technique
- ◆ VE screening identifies potentially high-cost design
- ◆ VE study performed concurrent with design elements



# Prefinal and Final Design

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- ◆ Incorporates final comments into the design submittal
- ◆ Final design must be certified by a licensed professional engineer
- ◆ Components of the prefinal and final designs



# Post-design Activities

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- ◆ RA solicitation
- ◆ Fund-lead requirements
  - » Obtain SSC
  - » Secure access to the site
  - » Develop an RA assignment for Fund-lead RAs
- ◆ PRP-lead requirements
- ◆ Federal facility-lead requirements

# The RA Process

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- ◆ RPM's role
- ◆ RA planning activities
- ◆ Procurement of RA contractor
- ◆ Preconstruction activities and RA submittals
- ◆ Construction
- ◆ Completion activities

# Key Personnel in the RA

- ◆ RPM
- ◆ TRT
- ◆ Oversight contractor
- ◆ RA contractor
- ◆ Resident engineer or construction manager
- ◆ Construction contractor's supervisor



# RA Implementation: Routine Activities

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- ◆ Health and safety issues must be monitored
- ◆ Inspection and testing in accordance with the QA plan
- ◆ RA schedule used to monitor progress
- ◆ Progress is documented in various logs and reports
  - » On-site
  - » Progress reports
  - » Daily field logs



# RA Implementation: Near Completion Activities

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- ◆ Prefinal construction conference held as each OU nears completion
- ◆ Prefinal inspection performed to identify deficiencies
- ◆ Final inspection ensures work is complete
- ◆ Settlement agreement reviewed at PRP-lead sites



# Value Engineering During Construction

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- ◆ VE is required by contracts
- ◆ RPM reviews the VE change proposal



# RA Implementation: Demobilization

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- ◆ Demobilization tasks:
  - » Removal of material
  - » Cleanup of debris
  - » Disconnection of utilities
  - » Completion of restoration or replacement
  - » Transfer of equipment and property
  - » Transfer of documents

# RA Implementation: Remedial Action Report

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- ◆ Prepared by the remedial action contractor 60 days after the final inspection
- ◆ Reviewed by the RPM
- ◆ Project completion report completed for PRP-lead sites

# Overview of O&M and Post Construction Activities

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- ◆ O&M begins when remedy is operational and functional
- ◆ Site closeout documents cleanup milestones
- ◆ Five-year reviews conducted at certain remedies to ensure protectiveness



# Operation and Maintenance

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- ◆ O&M activities include maintenance of treatment systems and final covers, monitoring of groundwater, and implementation of ICs
- ◆ O&M activities are initiated after determination that the remedy is operational and functional (O&F)
- ◆ O&M is funded, implemented and sustained by states or PRPs
  - » LTRA for groundwater and surface water restoration
- ◆ RPM responsibilities include oversight, optimization, and documentation of O&M activities

# Major Milestones in the Closeout of NPL Sites Under CERCLA

- ◆ Remedial action completion
- ◆ Construction completion
- ◆ Site completion
- ◆ Site deletion





# RA Completion for an OU

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- ◆ Occurs when the designated EPA regional official approves the Interim or Final RA report
- ◆ Will require a separate RA completion for each phase if the OU is implemented in phases
- ◆ Will vary for different remedies
  - » Excavation and off-site disposal
  - » On-site treatment of wastes (other than groundwater or surface water restoration)
  - » Containment
  - » Groundwater and surface water restoration involving active treatment
  - » Groundwater and surface water restoration involving MNA

# Construction Completion

- ◆ Means that all physical construction (under removal or remedial authority) is complete at the entire site
- ◆ Has no legal or financial significance
- ◆ Is achieved when the designated regional official signs the PCOR or FCOR and EPA HQs concurs
- ◆ Applies only to sites on the final NPL



# Site Completion

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- ◆ Signifies the end of all response actions at NPL sites
- ◆ Must meet specific criteria
- ◆ Requires an FCOR for documentation
- ◆ Enables site to be eligible for site deletion

# Site Deletion

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- ◆ NCP requirements dictate the deletion process
- ◆ NPL deletion criteria in § 300.425(e)
- ◆ Sites in O&M may be deleted
- ◆ NPL deletion through RCRA deferrals
- ◆ The deletion process

# Partial Deletion

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- ◆ Partial Deletion Rule and NCP requirements dictate the process
- ◆ Partial deletion process is similar to full deletion, except for:
  - » Mapping requirements
  - » Documentation requirements

# Five-Year Reviews

- ◆ Statutory requirement for five-year review
- ◆ Purpose of five-year review
- ◆ Five-year review process
- ◆ Site deletion is independent and unaffected by the five-year review requirement





# Records Management

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- ◆ Promotes efficiency in compiling and retrieving Superfund information
- ◆ Ensures that document storage space is adequate and secure
- ◆ Promotes compliance with relevant laws and regulations

# Roles and Responsibilities in Records Management

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- ◆ Role of HQ: Overall program goal setting and oversight
- ◆ Role of regional records manager: Day-to-day management of the system
- ◆ Role of RPM: Provision of latest site-specific documentation
- ◆ Role of records center staff: Day-to-day support of the system

# Types of Records and Files to be Maintained

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- ◆ Site files
- ◆ AR
- ◆ Litigation support documentation
- ◆ Cost documentation
- ◆ Documentation of damage to natural resources



## In Review

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- ◆ Remedial actions at NPL sites are designed to provide permanent solutions from the release of hazardous substances
- ◆ CERCLA establishes goals and management principles for remedial actions
- ◆ Remedial actions generally involve six major phases
- ◆ The RPM is responsible for directing and coordinating the remedial process