

US EPA ARCHIVE DOCUMENT



# INTRODUCTION

## Objectives of Introduction Module

Participants will:

- Understand overall objectives for the workshop
- Understand keys to success, ground rules and logistics
- Get to know other participants and instructors
- Be familiar with layout/content of workshop materials



## Objectives of Introduction Module (Cont.)

- Hear opening remarks on why this workshop is important
- Learn about Post-workshop activities and support
- Gain insight in other modules via true/false exercises



## Overall Objectives of Workshop

### Primary Objective:

- Share tools and approaches to improve the rate in which we achieve Interim and Final Remedies results

### Sub-objectives:

- Enhance communication
- Manage risks as well as uncertainties
- Capitalize on administrative flexibility



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### Notes:

Also, note that the objectives and problems that were identified on the preregistration forms are posted on the wall as well as being supplied at the end of this Module. Instructors will be trying to address as many of these participant-identified objectives and problems as possible during the workshop; however, participants are encouraged to take advantage of breaks, lunches, and the evening social to discuss specific issues with instructors.

## Due to Time Constraints, this Workshop Does NOT:

- Provide detailed background on the RCRA Corrective Action Program
- Convey an itemized list of all of the components of workplans and reports
- Provide detailed instructions on how to conduct an investigation or review data
- Teach participants to use any one particular process for implementing Corrective Action

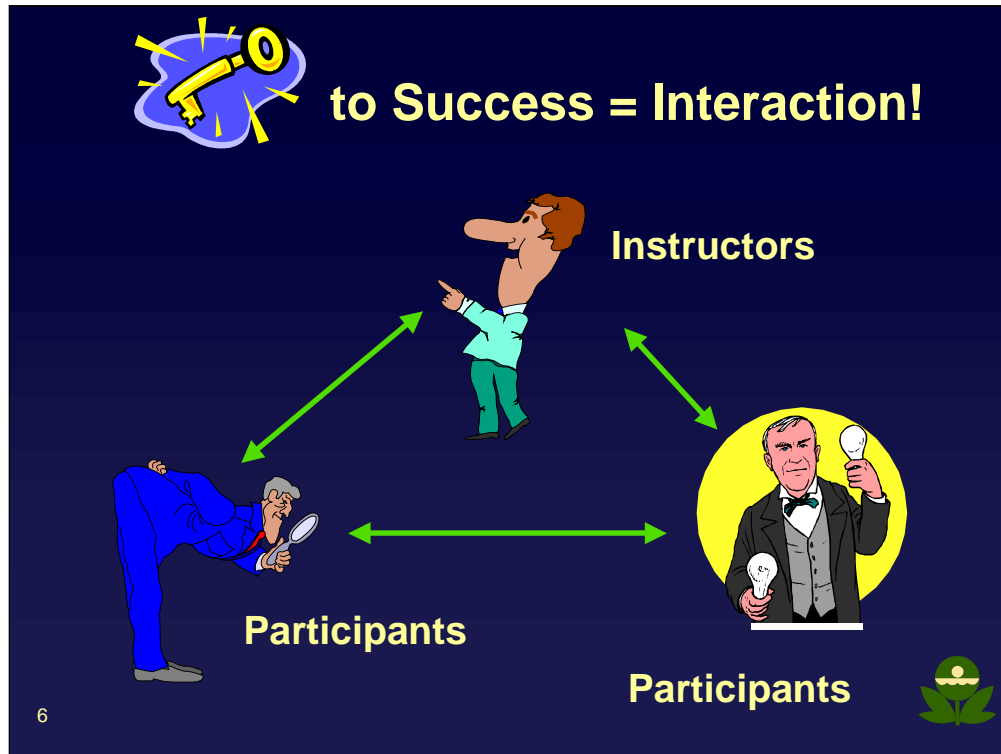


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Notes:

*History of RCRA Corrective Action* fact sheet provides background to Corrective Action; was sent to preregistrants in advance of the workshop and is included in the workshop Toolbook.

Extensive reference lists will provide participants with the means to access additional training, guidance, and other resources that can help with the implementation of RCRA Corrective Action. To the extent possible, the developers of the workshop have attempted to include instructions on where and how to obtain these resources whenever a resource is identified.



Notes:

While the instructors have considerable expertise, they clearly do not have all solutions to every Corrective Action-related problem. However, the workshop has been designed to take advantage of the wealth of experience of the instructors and the participants collectively to help develop solutions to the problems faced by the program. Facilitation will be used to promote interaction, which often will include having participants attempt to answer questions posed by other participants.

Workshop Groundrules:

- Respect each other's time and opinions;
- Try to avoid side conversations (except of course during breaks, where it is encouraged!);
- Participate in discussions;
- Be open to new ideas and approaches;
- Please be on time coming back from breaks so you don't miss key instructions or information; and
- **Please! Please! Please!** Complete your evaluation forms and turn them in so we can continue to make improvements in the workshop.

What is one of the Most Important acronyms  
you'll hear in the next 3 days?

**CFPF**  
**C**offee  
**F**acilities  
**P**hone  
**F**ood





## Participant Introductions and Experience Exercise

- Participant introductions and experience exercise
  - One word description of yourself outside of work
  - Add up total Corrective Action experience and divide by # of individuals at table (prizes!)
  - Capture answers on notes page

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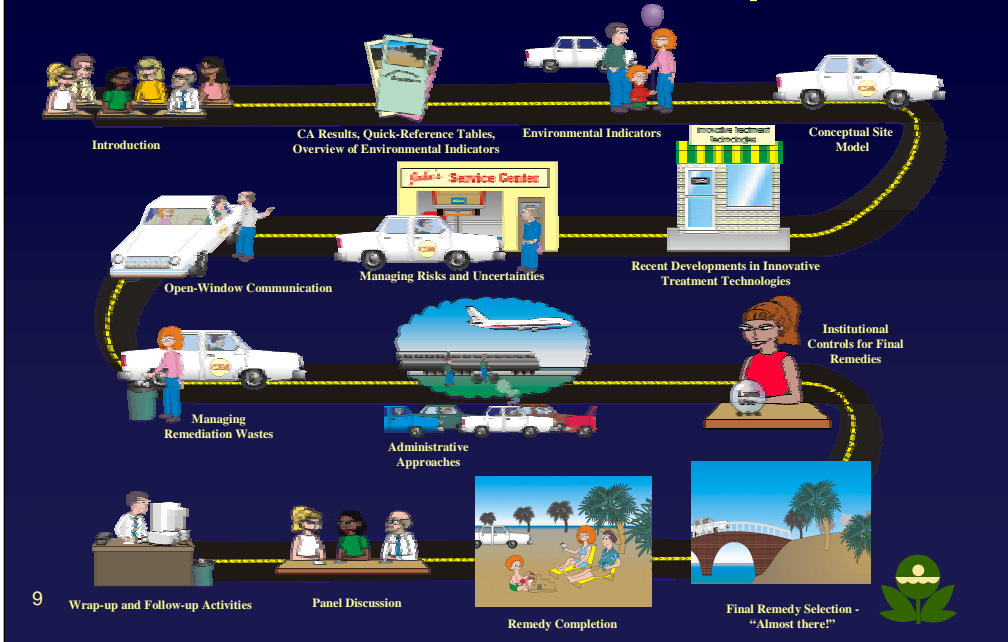
Notes:

Names and a one-word description of individuals at table:

Total table experience \_\_\_\_\_ / # of individuals at table = \_\_\_\_\_

Prizes given for most and least experienced table because the experienced individuals bring with them ideas as to what has worked and what hasn't worked in the past, and the less experienced individuals look at issues without being influenced by the past.

# Instructor Introductions and Overview of Workshop



# Introduction



“Planning the trip”

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## CA Results, Principles, Quick Reference Tables & Overview of Els



“Looking at destination brochure”



## Environmental Indicators



“The first destination!”



## Conceptual Site Model



“The vehicle to get where we need to go.”



# Monitored Natural Attenuation



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## Managing Risks and Uncertainties



"Check major items that could fail."





## Open-Window Communication



“Communicate effectively to help get where you want to go.”

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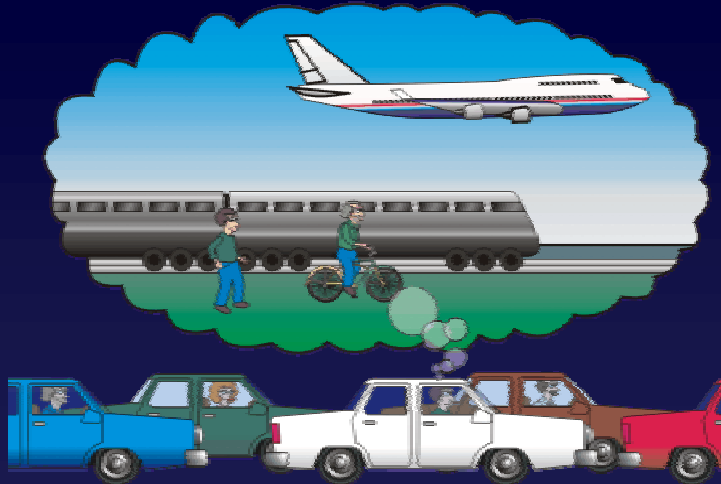
## Managing Remediation Wastes



“Handling the waste accumulated on the trip.”



## Administrative Approaches



“What’s the best way to get there?”



## Institutional Control



## Final Remedy Selection



"We're almost there!"



## Remedy Completion



"We made it, time to relax."

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## Panel Discussion



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## Wrap-Up and Follow-Up Activities



“Using what I’ve learned.”





## Layout and Content of Workshop Materials

- Workshop “Handbook” guides you through slides and exercises
- Workshop CD contains Toolbook and Remediation Waste Reference Handbook



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Notes:

Handbook:

- Agenda
- Table of Contents
- Instructor Biographies
- Workshop modules organization:
  - Module evaluation forms
  - Workshop slides and student notes
  - Useful Tools
  - List of references with instructions on obtaining them

CD:

- Tools Handbook - Resources/tools related to the module (e.g., guidance, fact sheets, form letters)
- Managing Remedial Waste under RCRA Reference Handbook - Resources/tools related to the Managing Remedial Waste module (e.g., guidance, *Federal Registers*)

## Why this Workshop is Important!

- Needed followup to guidance in 1996 Advance Notice of Proposed Rulemaking
- Workshop is major component of RCRA Cleanup Reforms
- Reforms emphasize:

**“FASTER, FOCUSED,  
MORE FLEXIBLE  
CLEANUPS”**



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### Notes:

A focus on results, rather than process, is a fundamental message of the May 1, 1996 Advance Notice of Proposed Rulemaking (ANPR) for the RCRA Corrective Action Program. The ANPR was issued for several purposes: it introduced a strategy for improving the Corrective Action Program (i.e., Subpart S Initiative), it requested information to assist in identifying and developing program improvements, and it provided a status report on the program and the latest Agency guidance for program implementation. A January 17, 1997 memorandum from EPA stated the expectation that the ANPR (in particular Section III) will be used as guidance for implementing the RCRA Corrective Action Program. A full copy of the ANPR and the January 17, 1997 is provided in the Corrective Action Workshop Toolkit.

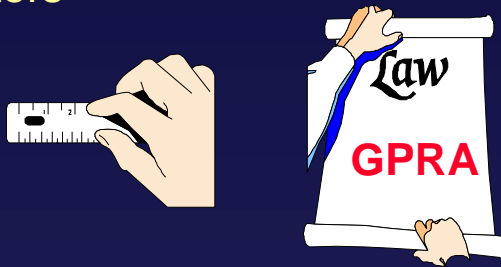
### Goals of the RCRA cleanup reforms include:

- Providing new results-oriented guidance with clear objectives
- Fostering maximum use of program flexibility and practical approaches through training, outreach, and new uses of enforcement tools
- Enhancing community involvement including greater public access to information on cleanup progress

Reforms Fact Sheet follows this page.

## Why Else is This Workshop Important?

- Emphasizes tools/approaches to improve rate of interim and final remedies
- Primary focus on Environmental Indicators



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### Notes:

Enacted in 1993, the Government Performance and Results Act (GPR), or the “Results Act” places new management expectations and requirements on Federal Agencies by creating a framework for more effective planning, budgeting, and programmatic and fiscal accountability for Federal Programs. The intent of GPR is to improve public confidence in Federal Agency performance by holding agencies accountable for achieving program results. References: “EPA Implementation of Government Performance and Results Act (GPR),” U.S. EPA: (Available to download from the Internet: <http://www.epa.gov/oigearth/gprsum.htm> and <http://www.epa.gov/ooaujeag/notebook/gprnew.htm>)

EPA has identified the two environmental indicators as the means by which we will be tracking the Program’s results in accordance with GPR.

Reuse and revitalization of previously contaminated land is a high priority for EPA and is the primary goal of the Agency’s Brownfields Initiative. RCRA plays an important role in many brownfields redevelopment projects and provides a fundamentally sound approach to the proper management of remediation waste to help prevent the brownfields of tomorrow. To the extent that we can make the redevelopment of these idle or underutilized urban properties attractive to developers, we discourage wasteful suburban sprawl. To that end, the EPA is exploring opportunities and implementing many innovative cleanup and redevelopment solutions while maintaining standards protective of human health and the environment. The principles, approaches, and tools addressed in this workshop are aimed at improving the pace of cleanups in general, which ultimately improves the pace at which previously contaminated land can be reused for beneficial purposes.

## What are These Environmental Indicators?

- Environmental Indicators (EIs):
  1. Current human exposures under control
  2. Migration of contaminated groundwater under control
- Site-wide determinations
- New guidance available 2/5/99



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### Notes:

Environmental Indicators (EIs) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved) to track changes in the quality of the environment. The two EIs developed to date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater.

### **"Current Human Exposures Under Control" EI:**

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA Corrective Action at or from the identified facility, i.e., site-wide).

### **"Migration of Contaminated Groundwater Under Control" EI:**

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA Corrective Action at or from the identified facility, i.e., site-wide).

## More on Environmental Indicators

- Make sense environmentally
- Achievable
- Opportunity to improve public confidence
- Accepted by Environmental Commissioners of States (ECOS)
- Acknowledged by industry groups as appropriate and reasonable measures of progress



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### Notes:

The importance of EIs, using the new EI guidance (to be discussed tomorrow in the EI module), and of achieving the GPRA goals was presented in a February 11, 1999 memo to EPA's Regional Administrators from Timothy Fields, Acting Assistant Administrator of the Office Of Solid Waste and Emergency Response. Included in that memo was the statement, "Achievement of the 2005 GPRA Corrective Action goals is my highest priority for the National RCRA Program. With this memorandum I am seeking a commitment from each Region to fulfill its share of our important goals for significantly reducing human exposure and controlling groundwater releases at RCRA facilities." This memo is included in the Workshop Toolbook.

## So What are the Specific GPRA EI Goals and Why Should you Care?

By 2005,

- 95% of the RCRA Cleanup Baseline will have to achieve the human exposure EI, and
- 70% of the RCRA Cleanup Baseline will have to achieve the groundwater EI

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### Notes:

The percentages are based on a baseline established in 1999 of approximately 1,712 facilities nationwide. These 1,712 facilities comprise roughly 1,500 high-priority facilities based on National Corrective Action Prioritization System (NCAPS) ranking plus approximately 200 other Regional and State priorities (e.g., brownfields sites).

GPRA is intended to be used for budget allocations based on the results achieved. Full impact of GPRA results is yet to be determined Government-wide

## How Much Work is Ahead of Us To Meet Our GPRA Commitments?

- 1,714 facilities in our GPRA baseline
- EPA Region 7 has approximately 100 of these facilities
- Current status is available in “State of RCRA Report” included in back of this module

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Notes:

A list of Region 7's RCRA Cleanup Baseline facilities is also included at the end of this module.

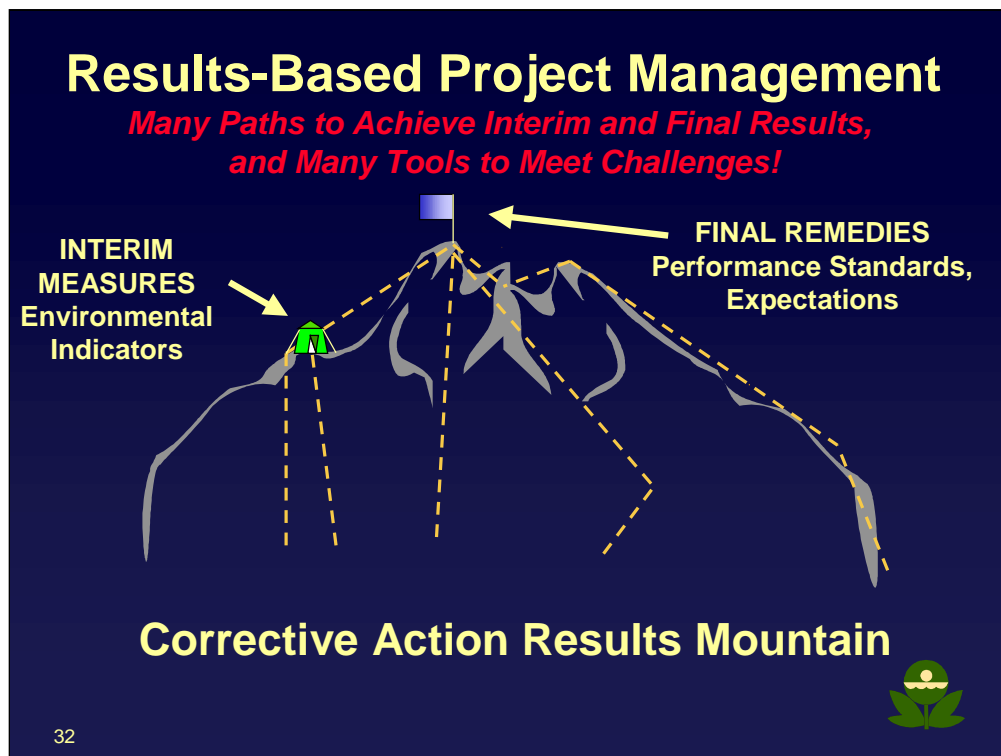
## Are EIs all We Have to Accomplish?

**NO!**

- EIs are important interim milestones en route to completing **FINAL** Corrective Action obligations







Notes:

As discussed previously, more detail will be provided on Environmental Indicators and Final Remedies in subsequent modules.

A results-based approach is focused on getting to interim measure and final remedy goals as quickly and efficiently as possible. This focus allows for, and even encourages, innovation to find the best route on a site-specific basis to achieve those goals. From EPA’s perspective, there is no one “right” path to get to the goals!

## What are the Basic Concepts of Results-Based Project Management?

- Maintaining focus and communication on achieving desired results, not administering a process!
- Identifying key decisions that need to be made to maintain focus on results
- Collecting only information needed to support those key decisions



## Results-Based Project Management (Cont.)

- Recognizing uncertainties are inherent, but can be managed
- Maximizing flexibility by using available tools to overcome impediments



## What are Some of the Major Impediments This Workshop Can Help Us Overcome?

- **Technical disagreements between EPA, States, and companies**
- **Excessive report and review requirements**
- **Reluctance of companies to perform cleanups**
- **RCRA requirements applied to remediation wastes**
- **Resource constraints**
- **Others?**



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### Notes:

These impediments were recently identified in the following two reports from the General Accounting Office:

- “Progress Under Corrective Action Is Limited, But New Initiatives May Accelerate Cleanups,” GAO/RCED-98-3, October 1997; and
- “Remediation Waste Requirements Can Increase the Time and Cost of Cleanups,” GAO/RCED-98-4, October 1997

This workshop was specifically designed to help overcome many of these impediments. For example, “Open Window Communication” and the “Conceptual Site Model” were designed to help overcome impediments associated with frequent disagreements and excessive reporting. Tools to overcome impediments associated with RCRA requirements applied to remediation wastes are addressed in “Managing Remediation Wastes.”

## What to Expect After This Workshop

- Establishing network of key personnel from each State and Region
- Let's talk
  - Conference calls
  - Meet at national meeting
  - Additional training/support



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### Notes:

An important feature of the RCRA Corrective Action Workshop is the emphasis that we (EPA Headquarters) will be placing on supporting the Regions and States in addressing implementation questions and challenges subsequent to the workshops. We will be making course instructors available to address critical or common questions and challenges that arise subsequent to the workshops. Since our resources are limited, we want to provide this support in a way that provides maximum value to the Regions and States. To accomplish this, we will need a key person from each State and Region who is interested in playing a pivotal role in this implementation effort.

### Support from the Instructors:

After each workshop we will hold a series of conference calls, one each month, to address specific major questions and issues on the application of particular tools and approaches presented at the workshop. To the extent possible, questions and issues should be identified at least 2 weeks in advance of the call so we can make sure to have the right individuals on the call to address those issues. Additional support/training for key State and Regional personnel will be provided as general needs are identified.

Notes:

Who should volunteer as Key Personnel?

You should consider this role if you:

- can see the benefits of some of the tools for your own sites;
- would be interested in serving as an advocate for these approaches in your Region or State, including talking with others in your Region or State on a regular basis to identify opportunities and issues for implementation after the workshop;
- would be interested in serving as a liaison with the other key personnel in your Region in establishing key areas for followup conference calls;
- would be interested in participating in the next RCRA National Meeting for additional problem-solving/training session; and
- would ultimately be interested in a train-the-trainer role for these tools and approaches in your Region or State.

What effort will be needed from Key Personnel?

- Discussion with coworkers in Region/State on implementation issues/questions for tools and approaches from the workshops.
- Coordinating phone calls once a month with other key personnel in your Region to identify key areas to request support from instructors for monthly conference calls.
- Communication to coworkers on time and topic of conference calls.
- Participation in monthly Regional conference calls, and participation at RCRA National Meeting that is generally held every 1.5 years (funding is generally provided for up to two individuals per State to attend this national meeting).

## What Else Can You Expect After This Workshop?

- Expanded Internet site available at:
  - <http://www.epa.gov/correctiveaction/#workshop>
- Modified workshop based on feedback
- Modules will be adapted to Interactive Internet

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## RCRA Corrective Action Brain Teasers

- Work in small groups to discuss and answer true/false statements regarding RCRA Corrective Action
- Correct answers will be provided in identified modules

