Reviewing the MR-QAPP: Regulator Perspective

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UFP-QAPP Policy and Applicability

- The Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP) is a tool to guide project teams through the systematic planning process.
- UFP-QAPP Munitions Response Toolkit
  - Module 1 - Remedial Investigation (RI)/Feasibility Study (FS)
  - Module 2 - Remedial Action (RA)
- EPA and DoD signed both as a voluntary consensus standard

UFP QAPP info and other information at:
https://www.epa.gov/fedfac/assuring-quality-federal-cleanups

MMRP Unique Challenges

- No promulgated regulatory standards or “safe” levels
- Unique risks
  - Acute hazard
  - Direct interaction may cause serious injury or death
  - Discrete hazardous items, not plumes
  - Attractive nuisance

Remedial Action

- Focus on remedy
- Data needs
  - Execute the remedy specified in the ROD
  - Demonstrate the remedy was implemented as specified
  - Demonstrate the remedy was protective
- Focus on individual munitions
  - Types on munitions and vertical boundaries
  - Rigorous quality considerations
- Defensibility

What is the remedy?

- Record of Decision (ROD)
  - Assumptions
  - Goals
  - UU/UE
- What data do you need to collect to prove you have achieved the remedy?
- UU/UE may come with extra steps in the process (see example in Module 2)

ROD guides the RA

- Data needs
  - Implement the remedy specified in the ROD
  - Assemble data to demonstrate goals of the ROD were achieved
- Some RODs may not provide all the information needed
  - It will need to be developed in the RA planning
- What are key decision points in the process?

Data Quality

- Effective QA/QC critical for stakeholder acceptance
- Clear and specific objectives necessary
- Basis for well-informed data driven decisions
- Inform regulators of issues promptly

Key MR-QAPP Worksheets

WS #10: Conceptual Site Model (CSM)

WS #11: Data Quality Objectives (DQO)

WS #17: Sampling Design and Project Workflow

WS #12: Measurement Performance Criteria (MPC)

WS #9: Project Planning Sessions

WS #37: Data Usability Assessment (DUA)

WS #6: Communication Pathways and Procedures

WS #10: Conceptual Site Model (CSM)

- Major elements of the CSM include
  - Facility profile,
  - Physical profile,
  - Release profile, and
  - Land use and exposure profile

- Does the CSM match? Has it been updated and consistent with previous work (RI/FS, etc.)

- Include vertical depth profile for munitions

WS #11: Data Quality Objectives (DQO)

- **Remedial action objectives**: General descriptions contained in the ROD of what the cleanup will accomplish.
- **Remediation goals**: Clean-up levels the remedy is expected to achieve that are protective of human health and the environment.
- **Remedy components**: Treatment, engineering controls, institutional controls, and monitoring.

WS #11: Data Quality Objectives (DQO)

Table 11-1: Summary of Selected Remedy

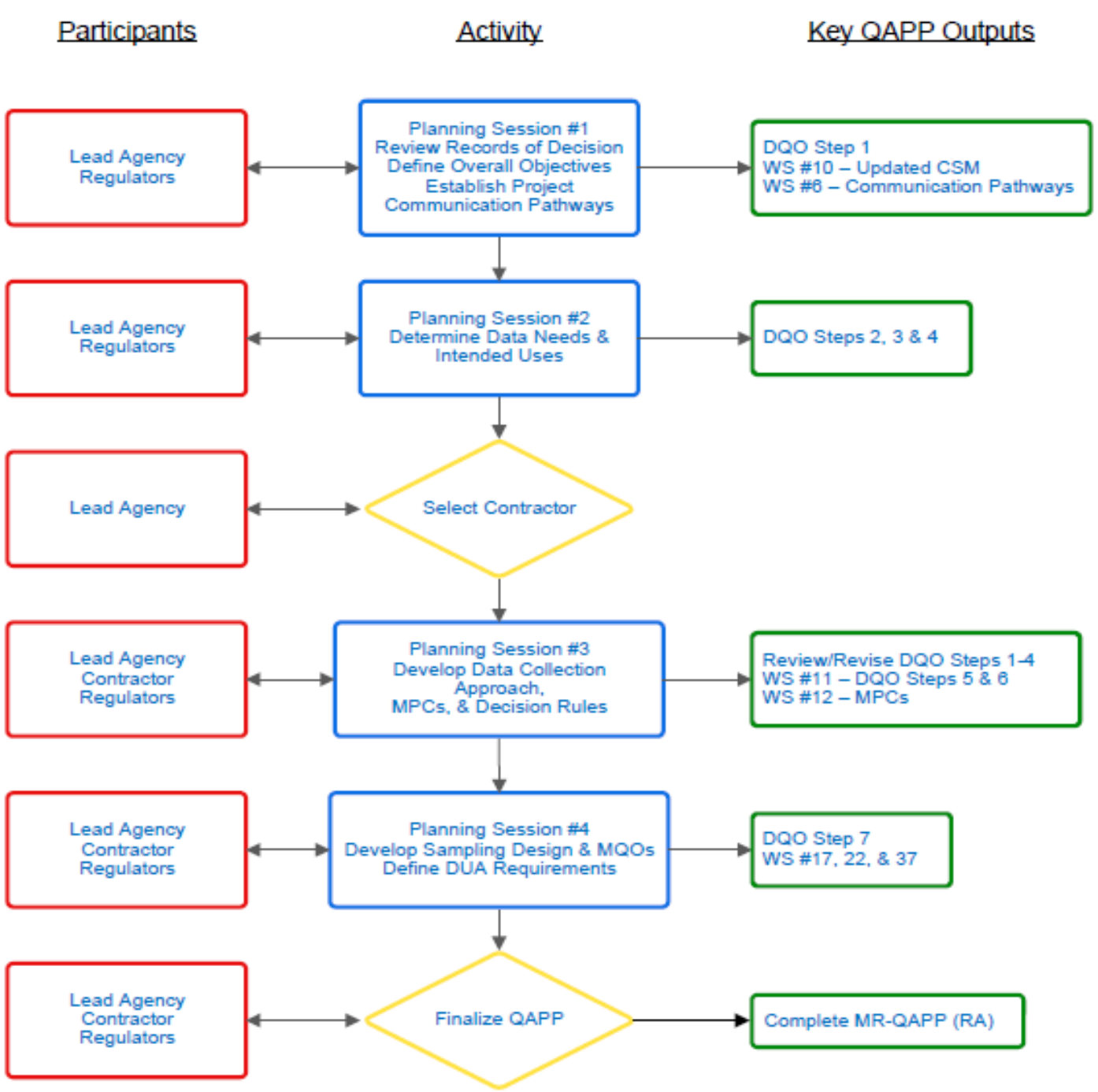
MRS/Selected Remedy	Remedial Action Objectives	Selected Remedy Components		
		MEC Removal	MEC Treatment	Land-Use Controls[12]
MRS A1 Maneuver Area Development Area Alternative # __ MEC surface and subsurface removal using non-AGC DGM detection and cued AGC with interim land use controls	Remove MEC in the surface and subsurface Remedial action is designed to achieve UU/UE MEC Removal Remediation Goal: Detection and removal of: • 60-mm mortar to a minimum depth of 0.45 m bgs • Practice hand grenades, signals, flares, pyrotechnics, 2.36" practice rockets, and practice anti-tank mines to a depth of 0.30 m bgs • Any other munitions present on the site that are detectable at the anomaly selection criteria	Anomaly detection using non-AGC DGM TOI selection using cued AGC TOI investigation and source removal using manual and backhoe-assisted excavation	All recovered MEC to be detonated in place or otherwise destroyed on-site	Add interim LUCs if specified in applicable decision document (DD) Upon successful remediation, LUCs will be removed

WS #17: Sampling Design and Project Workflow

- Describes and justifies the design for remedies to be implemented
- Must include:
  - A map showing physical boundaries for the area(s) under study.
  - The basis for dividing the site into survey units and how they will be managed at each phase of the process.
  - Decision-logic diagrams
  - Concise descriptions for each DFW.
  - Contingencies in the event field conditions are different than expected and could have affect the survey design
  - Points in the process at which lead organization, regulatory, and stakeholder interface will occur, as agreed upon during project planning

Worksheet #12: Measurement Performance Criteria

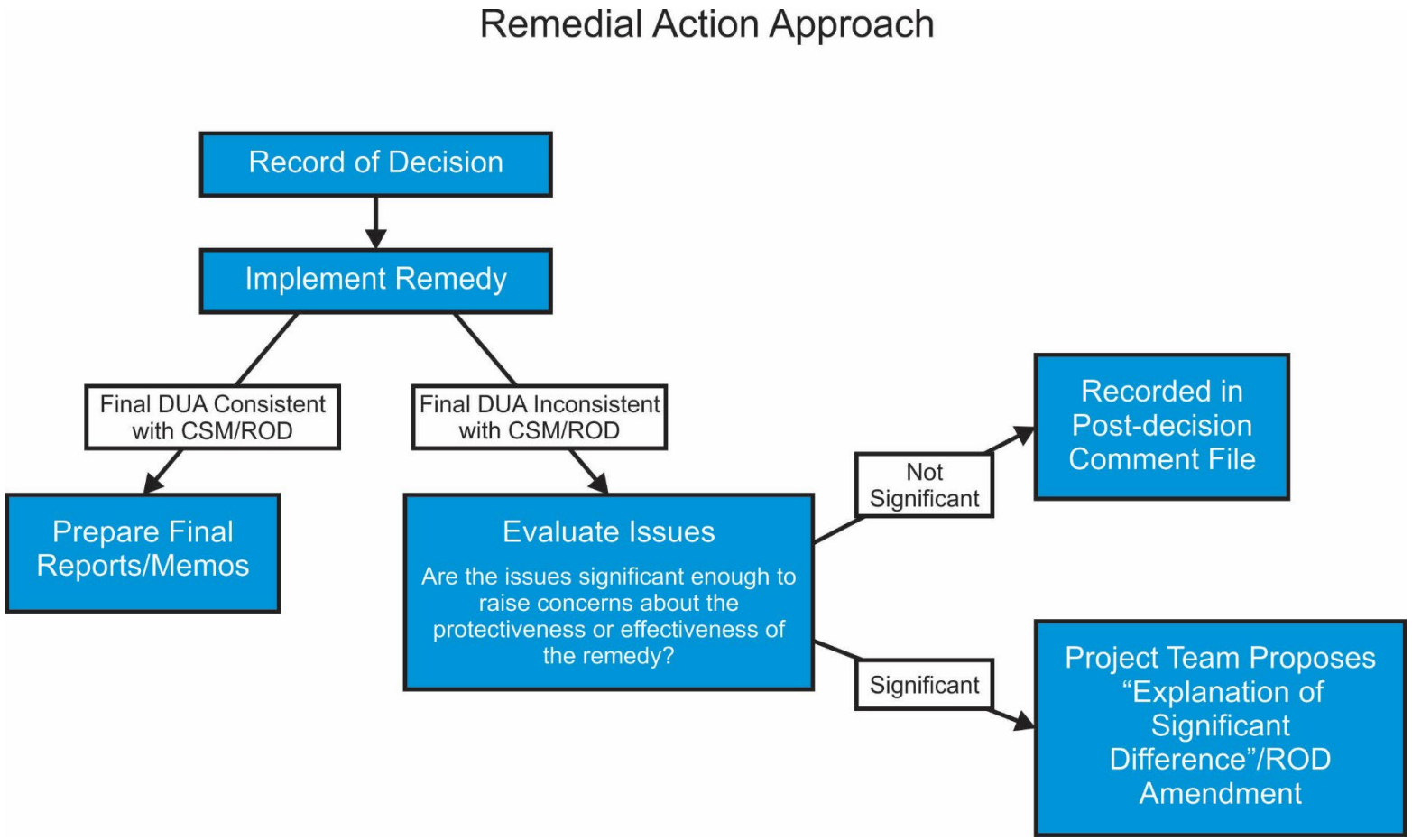
- Seeds are vitally important for regulator acceptance
- Does the project seeding plan make sense? Is it robust enough?



WS #9: Project Planning Sessions

- Regulator participation necessary for successful project planning
- Define the PWS
- Do the process right

WS #37: Data Usability Assessment (DUA)



WS #6: Communication Pathways and Procedures

- Documents specific issues that trigger formal communication with other project personnel or stakeholders

- Regulators should have input and agreement prior to contractor onboard

Final thoughts

- Follow the process, it was designed for a reason
- Checklist
- Additional training

Questions?

Contact Info:

Doug Maddox, P.E.

US EPA Federal Facilities Restoration and Reuse Office

maddox.doug@epa.gov

202-669-3321