



M2S2 Webinar Series - Characterization

QUALITY: An EPA Regulatory Perspective

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OVERVIEW

- Where is EPA involved
- EPA concerns at munitions response sites
 - Conceptual Site Model
 - Current and Future Receptors
 - Institutional Controls
- EPA working with others on munitions response quality
 - Intergovernmental Data Quality Task Force (IDQTF)
 - Munitions Response Dialogue (MRD)
 - Munitions and Explosives of Concern Hazard Assessment (MEC-HA)



EPA Involvement

- National Priority List (NPL) Sites, always
- RCRA Corrective Action, almost always
- Non-NPL Sites, typically not involved, except:
 - High priority based on risk
 - High priority based on other factors
 - Involvement requested and resource expenditure approved by EPA management



EPA Responsibility

- Ensure projects comply with federal law, regulations and guidance for characterization, cleanup and close-out.
- Provide concurrence with significant project decisions, joint remedy selection at NPL sites and RCRA Corrective Action
- Five Year Review



EPA Approach for MMRP Sites

- Same level of involvement as other contaminants
- Similar review including technical specialists, EPA HQ and attorneys as appropriate
- At NPL Sites MMRP Sites need to be resolved for Construction Completion



Stakeholder Planning Strategy

- Initial discussions should lead to agreement on goals for the site(s)
- Current and future pathway analysis
 - Acute issues and media contamination
 - Conceptual site model development
- Interim land use control discussion
- Data Quality Objective (DQO) discussion
 - Ensure data will be high quality and adequate for the decisions to be made



Geophysical Data Collection

- EPA fully supports use of 'new' tools for collection of high quality geophysical data
- EPA shares concerns that the universe of executing contractors is small
- Certification could help build confidence



Classification

- EPA fully supports classification to improve quality and geophysical target selection
- EPA has limited capability and experience
- Heavy reliance on others to perform classification QA/QC



Intergovernmental Data Quality Task Force (IDQTF) Background

- Formed in 1997 to address issues related to the management of environmental data quality at Federal Facilities
- Original mission of the IDQTF was “to document an intergovernmental quality system, beginning with the hazardous waste programs”
- Issued the Uniform Federal Policy for Implementing Environmental Quality Systems (UFP QS) in January 2003
- Issued the Federal Quality Systems Roles and Responsibilities Guidance in July 2004
- Issued the Uniform Federal Policy for Quality Assurance Project Plans (UFP QAPP) in July 2004
- Issue optimized UFP QAPP worksheets in FY2012



IDQTF and Munitions Response

- Current IDQTF priorities are to help develop and approve cleanup standards in a QAPP format for munitions and small arms range response (including geophysical classification)
- IDQTF working with USACE and others developing and revising MEC UFP-QAPP templates
- Capitalize on existing work and not reinvent the wheel
- Rely on technical experts for detection standards, while participating in an interagency approval and endorsement process for the quality assurance documents



Munitions Response Dialogue

- DoD, Federal Land Managers, States and EPA dialogue group
- Discussing quality issues associated with:
 - Land Use Controls
 - Cleanup Decisions
 - Classification
 - Interim Risk Management
 - Underwater Munitions
 - Constituents
 - Coordination



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Munitions and Explosives of Concern Hazard Assessment (MEC-HA)

- DoD/EPA cooperative effort
- Provides site managers a tool to evaluate cleanup options
- Typically employed during the Feasibility Study
- Can be used for Removal Actions
- Can be used to evaluate Interim Actions



SUMMARY

- Early stakeholder involvement
- Realistic future land use assumptions
- Accurate Conceptual Site Model
- Use of 'standard' formats and templates
- High quality data collection, evaluation, presentation
- Interim use control consideration



Reference

- **EPA Federal Facilities Restoration and Reuse Office (FFRRO)**
- **<http://www.epa.gov/fedfac/>**
 - FFRRO Activities
 - Policy development and implementation:
 - Stakeholder Involvement:
 - Interagency Coordination:
FFRRO Program Components
 - Relevant Statutory Authorities
 - Library (see Munitions)



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