#### **M2S2 Webinar Series - Characterization**

#### **QUALITY: An EPA Regulatory Perspective**

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# UNITED STATES

# **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

# THE STATES

## 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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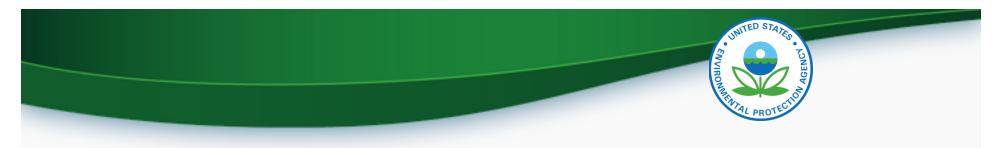


#### Munitions and Explosives of Concern Hazard Assessment (MEC-HA)

- 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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