



DERP FORUM

Achieving Greater Success Through Strong Partnerships

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EPA MMRP Perspectives

Doug Maddox, P.E, US EPA Federal Facilities Restoration and Reuse Office

Overview

- Partnering
 - MRD
 - IDQTF
- MR QAPP & Data Quality
- MMRP Challenges

Munitions Response Dialogue (MRD)

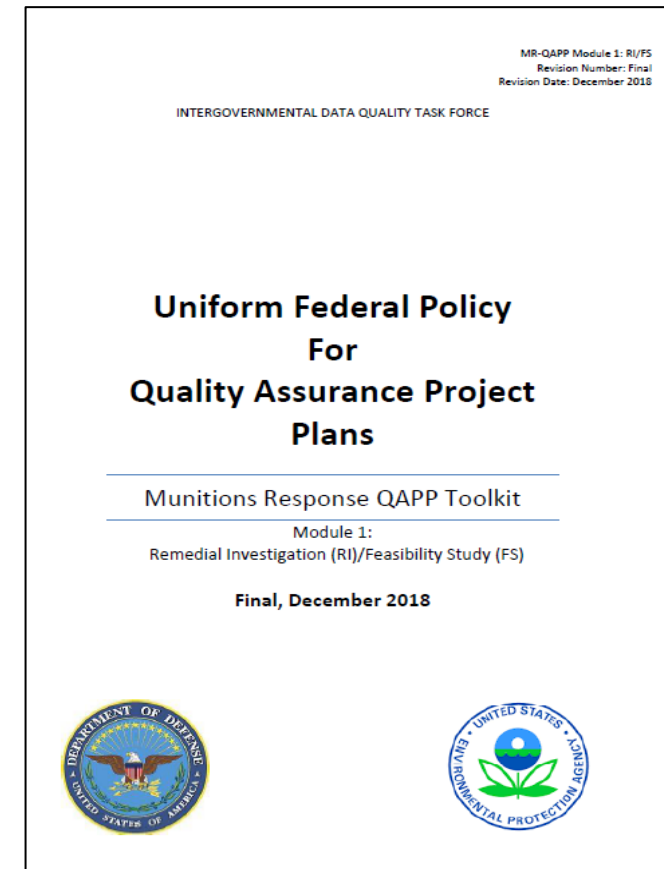
- DoD, EPA, and States co-chair discussion group for national munitions response issues
- Feedback for RMM tool updates
- Technology updates
- Training

Intergovernmental Data Quality Task Force (IDQTF)

- IDQTF chaired by EPA with DoD and DOE
- Developed Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP)
 - Updated UFP QAPP worksheets and examples
 - MR QAPP Modules 1 & 2
 - <https://www.epa.gov/fedfac/assuring-quality-federal-cleanups>
- Other initiatives being discussed

MR-QAPP Toolkit Overview

- Planning tool for characterization and remediation of munitions and explosives of concern (MEC)
- Module 1: Remedial Investigation/Feasibility Study (RI/FS) Dec 2018/Updated Apr 2020
- Module 2: Remedial Action (RA) Apr 2023
- Based on Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP, IDQTF, 2005)
- Implements systematic planning process (SPP)



MR-QAPP Toolkit Overview

- Based on Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP, IDQTF, 2005)
- Implements a systematic planning process (SPP)
 - Black text = minimum recommended requirements
 - Blue text = examples
 - Green text = instructions
- Illustrates
 - Use of the Conceptual Site Model throughout the project
 - Process for conducting the Data Usability Assessment (DUA), a critical component of data analysis and decision-making
- Examples use multiple geophysical technologies to illustrate the applications of each
- The MR toolkit does not address sampling for Munitions Constituents

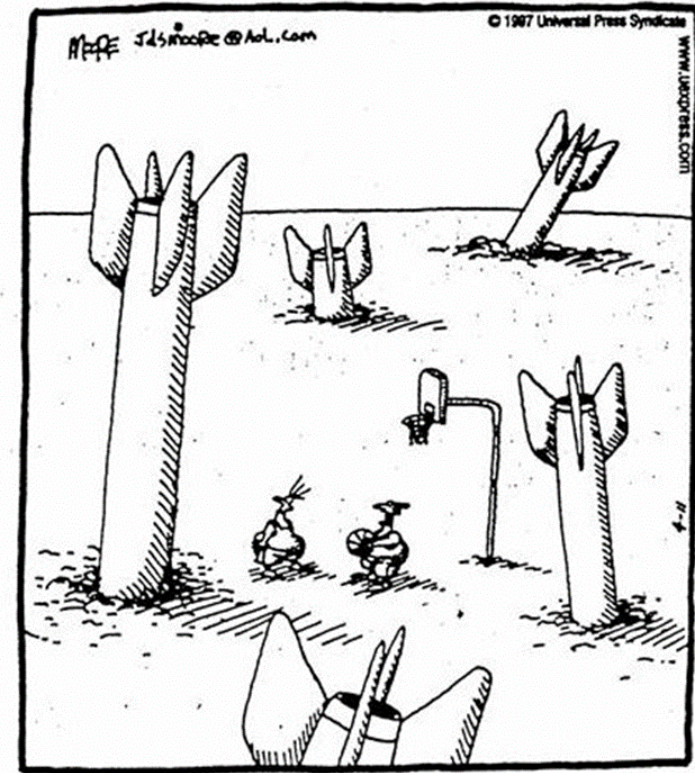
Data Quality

- Data quality is essential for making informed decisions
- Weight of Evidence approach
- How do we ensure data quality?
 - Quality systems
 - Accreditation programs
 - Technology specific concerns

MMRP Challenges

- Consistency and capacity
- Site Cleanup Decisions
 - Variety of remedial alternatives
 - Lines of evidence for decisions
 - Decision document clarity
- Risk/Hazard Assessment
- UU/UE determinations
- OB/OD

IN THE BLEACHERS



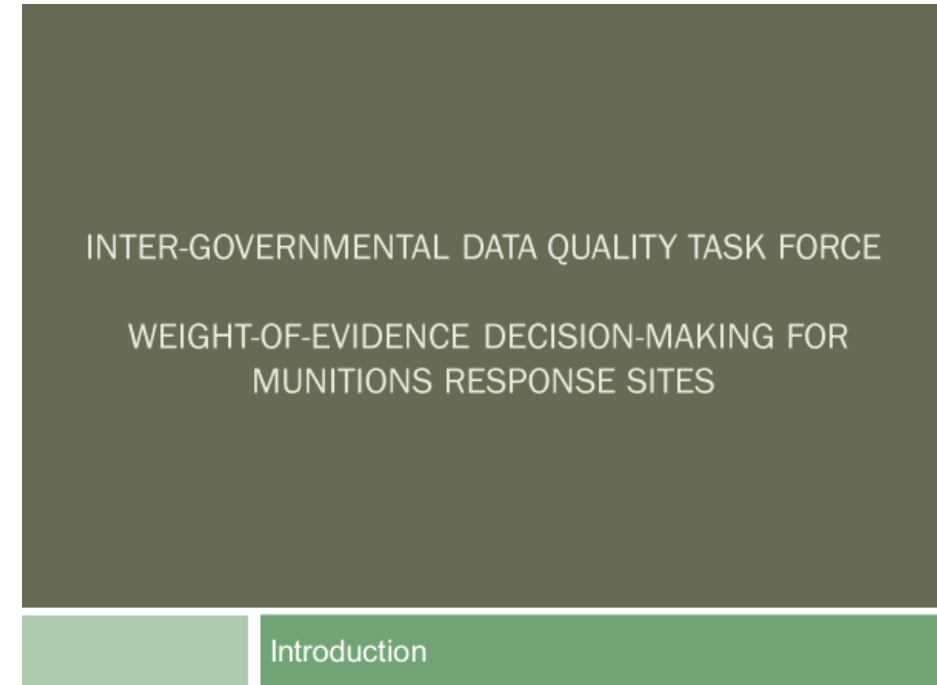
"Maybe we shouldn't play here."

Building Consistency and Capacity

- National EPA Munitions Support Contract
- EPA RPM Workgroup
- Training and Technical Support to Regions

Training

- MR QAPP Toolkit Course
 - Joint course covering MR QAPP Toolkit Modules 1 & 2
 - Weight of evidence approach
 - Breakout groups mimic project team structure working through site examples
- EPA & ASTSWMO training
- MRD Training Database



Federal Facilities RPM Training

- ◆ Webinars focus on federal facility topics and perspectives.
 - Offered live every even year (2024 schedule under development)
 - Archived versions available year round
 - <https://www.trainex.org/FFacademy>
- ◆ Register for in person Federal Facilities RPM Course on www.trainex.org
- ◆ Complete 11 webinars and the 3-day classroom training for a certificate of completion



U.S. EPA
Federal Facilities Academy

The Federal Facilities (FF) Academy is a voluntary training program developed for EPA RPMs, project managers from other Federal Agencies and Tribal, State, and local governments who work on Federal Facility Superfund cleanups.

2022 Webinar Schedule*
(1-3pm ET)

- Feb. 9: [Federal Facility Five-Year Review](#)
- Mar. 9: [Record of Decision \(RODs\) and More at Federal Facilities](#)
- Apr. 13: [Military Munitions Policy Overview](#)
- May 11: [Land Use and Onsite/Offsite Determinations](#)
- Jun. 8: [Resolving Issues before Formal Dispute](#)
- Jul. 13: [RCRA/CERCLA Integration](#)
- Aug. 10: [Groundwater Policy Overview](#)
- Sep. 14: [Community Involvement at Federal Facilities](#)
- Oct. 12: [Role of Superfund Performance Measures](#)
- Nov. 9: [Coordinating with Tribes at Federal Facilities](#)
- Dec. 7: [Determining Applicable or Relevant and Appropriate Requirements \(ARARs\) in RODs](#)

12 courses total

11 webinars and a 3-day classroom training**

Receive a certificate of completion

**The Federal Facility RPM classroom 3-day course is offered in various locations throughout the year. Check <http://www.trainex.org> for upcoming dates.

*Webinars are archived for later viewing and can be completed for course credit

Register for Courses at
<https://www.trainex.org/FFacademy>

For questions, contact: Emerald Laija
Federal Facilities Restoration and Reuse Office (FFRO)
Laija.emerald@epa.gov or 202-564-2724

Munitions site cleanup decisions

- Need robust remedial alternatives range
- Don't default to LUCs only every time
- Decision document language – need clear, concise and factually correct decisions
- Selected remedy needs to be clearly supported

Risk/Hazard Assessment

- MEC Hazard Assessment (MEC HA)
 - Jointly developed tool
 - Dated but still useful
- Munitions Hazard Assessment Tool (MHAT)– Air Force tool
- Risk Management Methodology (RMM) – Regulator concerns
- Underwater

Unlimited Use/Unrestricted Exposure (UU/UE)

- UU/UE generally is the level of cleanup at which all exposure pathways present an acceptable level of risk for all land uses
- Is UU/UE possible at munitions sites?... maybe, it depends on many factors
- “Acceptable risk” does not always = UU/UE
- MR QAPP Module 2 example
- Stakeholder acceptance
- ROD language

Open Burning/Open Detonation (OB/OD)

- June 7, 2022 EPA HQ memo *Open Burning and Open Detonation (OB/OD) of Waste Explosives Under RCRA*
- Revisions to Standards for the Open Burning / Open Detonation of Waste Explosives
- What does this mean for CERCLA actions?
 - Applicable or Relevant and Appropriate Requirements (ARARs)
 - Alternative Technologies to OB/OD
- MMRP needs to do a better job documenting decision process for treatment technology when utilizing OB/OD at cleanup sites



Questions?