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Nation's Environmental Stewardship Since 1974

Uniformity of Time-Critical Removal Action Referrals

Acknowledgement

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EXECUTIVE STATEMENT

The ASTSWMO Removals Focus Group (Focus Group) has developed a form for putting together consistent referral packages across the States and Territories (States). This form identifies critical information needed to appropriately evaluate the commitment of limited resources by the U.S. Environmental Protection Agency (EPA) when reviewing referral requests. It also addresses the need for consistency in the removal action request process that has been identified by EPA headquarters, the regions and States.

It builds off previous work conducted by the Focus Group, including their most recent work [Time-Critical Removal Capabilities](#), which was published in January of 2019. That research focused on the capacities and needs of the ten EPA Regions (Regions) and States in the performance of Time-Critical Removal Actions (TCRA) by identifying the resources each potentially offers to this type of response action, and the dynamics of the partnerships created between federal and State agencies. The other project that this fact sheet references is the Focus Groups' work on [Transition Issues Analysis](#), which was published in 2013. The [Transition Issues Analysis](#) report gathered information on issues relating to the transition of removal sites to and from the State and federal programs, and to identify approaches, concerns, strengths and weaknesses related to these transitions.

Introduction

The Focus Group continues to research ways in which State and federal environmental programs can benefit each other while advocating for strong partnerships between the States and Regions. The development of an easy to use, comprehensive, and innovative referral form is the result of the Focus Group's dedication to using historic and current information combined with potential future needs to make the day-to-day interaction between the States and EPA more efficient and effective.

In 2013, the Focus Group published the [Transition Issues Analysis](#) which broke down the processes for Emergency Response, Time-Critical Removal, and Non Time-Critical Removal activities into detail. As a part of that document, a matrix was produced illustrating a timeline that highlights steps within the time-critical removal process where States may be involved. Following the publication of that document, the Focus Group determined that there was a wide variability in participation by the States and additional information was needed.

In order to build upon the previous information gathered, the Focus Group researched examining extents and degrees of State participation in the time-critical removal process. The Focus Group included the participation in this research by EPA Removal Managers to gain their perspectives and help find ways that States may be able to assist EPA Regions with TCRA's. In January 2019, the Focus Group published [Time-Critical Removal Capabilities](#) which identified ways to more efficiently use and share limited resources available at all levels and build synergistic partnerships between agencies in the satisfaction of this vital environmental service that protects human health and the environment.

Based on these studies and the U.S. EPA Office of Environmental Management (OEM) memo dated January 17, 2017 discussing the need for consistency across the Regions, the Focus Group set out to learn where States had consistency and inconsistency in the referral process. States were asked to discuss their process and examples of forms or templates were welcomed. From that information, the Focus Group compiled information that was uniformly included in referrals and incorporated additional useful information that could support the request.

GIS tools and mapping needs are becoming more prevalent and ingrained in our programs, more mainstream for data sharing with other agencies and the public. To allow this form to remain relevant going forward, it was drafted in Excel. This will allow the data to be drawn directly into mapping and modeling programs. The basic structure of the Excel form can be converted into a GIS form such as Survey 123 to more easily communicate with mapping and modeling programs, but the Focus Group recognized that an Excel form would be more universally accepted by the different State programs at this time.

It is the intent and the goal of the Focus Group that this form can be easily integrated into use by States for a uniform referral process that contains the information necessary to make the appropriate decision to commit limited resources. The presented form also enables that addition of mapping functions the States and EPA can tailor for specific programmatic needs and the collection of metadata.