



INTEROFFICE CORRESPONDENCE



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DATE April 20 1993
 TO Distribution
 FROM S D Cooke Legal Bldg 111 X3497 *SD*
 SUBJECT RESOLUTION OF TASK PLAN NO 4 ISSUE SDC-024-93

Task Plan No 4 (RCRA/CERCLA Integration) includes subtask No 6 which requires a regulatory review of previously submitted ERM deliverables to identify and resolve potentially unaddressed waste issues. The subtask identifies a completion date of May 25 1993.

Today I met with Tye De Mass and Kay Bentzen of ERM and Jim Fitzsimmons of Waste Programs to review the options for closing this task. The following four options were identified:

- 1 Perform an internal ERM review of appropriate documents for waste issues. This option was not favored as ERM lacks the necessary subject matter experts in waste issues to adequately spot issues and does not provide for an independent/peer review.
- 2 A core team (ERM Waste Programs Legal) meeting with each OU manager to identify potential waste issues followed up with a review of those documents which evidence those potential waste issues. This option was not favored due to coordination and time constraints and the belief that if an OU manager is aware of a potential waste issue that manager would be in the process of resolving it.
- 3 A memorandum closing the subtask as no further action is needed. This approach is founded on the belief that with dedicated Waste Programs personnel now integrated into the ERM organization any previously unidentified waste issues arising from the early program planning will be intercepted and resolved prospectively. This interception would occur as site activities/treatment technologies are designed, procured and executed. Resolution of the waste issue would occur before the activity was initiated or corrective action implemented upon discovery of the issue. This option was not entirely favorable due to concerns over perceived inconsistency with good project management practices, potential cost and schedule impacts of problems.

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identified late in the project and the general belief that this option is reactive rather than proactive

- 4 The preferred option is to utilize a subcontractor with expertise in both the RCRA and CERCLA programs to review selected program documents. This subcontractor should be one not currently supporting ERM's primary deliverable efforts. The subcontractor would conduct its review of relevant documents under a routine ERM programmatic objective (QA?) and thus outside of this Task Plan. This approach would provide for a more thorough and reasoned review without the short term schedule pressures of the Task Plan. Acquiring a subcontractor for this effort is not presently budgeted and the availability of an existing contract mechanism to perform the task is not presently known.

We request your thoughts on choosing an option to resolve this matter. Please contact me at Ext 3497 to discuss.

Distribution

R L Benedetti
T G Hedahl
G L Potter

cc
Tye De Mass
Kay Bentzen
J R Fitzsimmons



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