

RCRA FIRST TOOL 11: Communication Plan

The following table outlines a step-by-step communications approach for the RCRA Facility Investigation and Remedy Selection processes, including the purpose of each meeting, the participants, the documents needed in advance, and applicable RCRA FIRST Tools. The Step # refers to the steps in the RFI and RSP full process maps, which are separate attachments not included in this Toolbox. Requests for copies of these process maps can be made by emailing Paul Gotthold (gotthold.paul@epa.gov) and Don Lininger (Lininger.Don@epa.gov).

RCRA FIRST Communication Plan

Process/Focus Area:
RCRA Facility Investigation
Process and Remedy Selection
Process

Prepared by:
Approved by:
Revision #:
Process Owner:

Prepared date:
Approved date:
Revision date:

Table A.6 RCRA Facility Investigation Communications

Communication	Purpose	Participants/ Recipients	Documents Needed in Advance	Step # in Process	RCRA FIRST Tool(s)
A) Corrective Action Framework Meeting	Agree on RFI Objectives, framework of Investigation, Potential IMs, and CAF for the facility	CO-CHAIR: STATE/EPA PM and FACILITY PM (PM manager, tech support (e.g., hydrogeologist, toxicologist); State (PM manager, tech support); Facility PM manager, o/o?)	Background documents (CCR/DCC/RFA); current and future land use; receptors; aquifer designation; community concerns; permit; map; graphical description of data	3,4	<ul style="list-style-type: none"> ■ Corrective Action Framework Meeting Agenda ■ Corrective Action Framework Template ■ Elevation Tool
B) Workplan Dialogue and Information Exchange	Clarify issues as they appear in workplan development, identify and record decisions made	STATE/EPA PM and FACILITY PM; Technical Support	Facility-specific CAF (and background documents	6-9	<i>Facility-specific</i> Corrective Action Framework

Communication	Purpose	Participants/ Recipients	Documents Needed in Advance	Step # in Process	RCRA FIRST Tool(s)
C) RFI Progress Dialogue and Information Exchange	Assess changing site conceptual model as data developed; impacts to investigation objectives and interim measures.	CO-CHAIR: STATE/EPA PM and FACILITY PM Agency and Facility PMs, Technical Support	Facility specific CAF (and background documents and approved workplan including schedule	10-11	<ul style="list-style-type: none"> ■ RCRA FIRST Data Evaluation tool ■ Conceptual site Model Iterative Evaluation Tool
D) Field Data Review Meeting - Chair to provide agenda and data presentation	Assess data, review updated site conceptual model, and agree on path forward with regard to risk (i.e., risk screening, full risk assessment, or presumptive remedy)	CHAIR: FACILITY PM Agency and Facility PMs; consultants; hydrogeologist; risk assessor	Technical memo; tabulated lab results; updated site conceptual model; baseline risk assessment	19	<ul style="list-style-type: none"> ■ <i>Facility-Specific</i> Corrective Action Framework ■ RCRA FIRST Data Evaluation tool ■ Conceptual site Model Iterative Evaluation Tool ■ Elevation Tool
E) RFI Report and Risk Assessment Approval Meeting	Gain consensus on remaining issues impacting approval of draft RFI Report	CO-CHAIR: STATE/EPA PM and FACILITY PM Agency and Facility PMs; consultants; hydrogeologist; risk assessor	Draft RFI Report and Preliminary Risk Assessment from facility	22	<ul style="list-style-type: none"> ■ <i>Facility-Specific</i> Corrective action Framework ■ Elevation Tool

Table A.7 Remedy Selection Process Communications

Communication	Purpose	Participants/ Recipients	Documents Needed in Advance	Step # in Process	RCRA FIRST Tool(s)
A) Remedy Selection Process (RSP) Meeting - CMS Workplan or Data Collection Workplan Meeting* (at same time or separate)	Reach agreement on corrective action objectives and CMS approach for selecting the proposed remedy	CO-CHAIR: STATE/EPA PM and FACILITY PM State/EPA and Facility Supervisors; Agency and Facility Technical Support (hydrogeologist, risk assessor, etc.); outside stakeholders**	Final RFI Report, final site conceptual model, and RFI summary; appropriate guidance on remedy selection, engineering and institutional controls	4,5	<ul style="list-style-type: none"> ■ RSP Meeting Agenda ■ RSP Template ■ RCRA FIRST Toolbox Section IV ■ Developing Corrective Action Objectives Tool ■ RCRA Post-Remedial Care Tool
B) RSP Process Dialogue and Information Exchange	Define scope of CMS Workplan or Data Collection Workplan	STATE/EPA PM and FACILITY PM; State/EPA and Facility technical advisors	Same as above, new data developed since Final RFI Report	7-10	<i>Facility-specific RSP Document</i>
C) Remedy Selection Meeting	Select the preferred alternative	STATE/EPA PM and FACILITY PM; first line managers;	Draft CMS Report, Remedy selection criteria, Facility-specific RSP	12-14	<i>Facility-specific RSP Document</i>

*CMS Workplan or Data Collection Workplan may not be needed, in which case corresponding meeting would not be held

**Other Stakeholders (if warranted)

***Outside Stakeholder involvement may be desired at this time or in parallel fashion