Army Cost-to-Complete (CTC) and Compliance-Related Cleanup (CC) Guidance Updates

Briefing Objectives

- Overview of updated CTC and CC guidance
  - Interim Final CTC Guidance
  - Working Draft CC Guidance - comments
- How you should use them

Agenda

- **CTC and CC Workgroup**
- CTC Guidance Overview
- CC Guidance Overview
- Challenges

CTC and CC Workgroup

The CTC and CC Workgroup members included participants in cleanup program:

Office of the Director, Environmental Programs (ODEP)	**Installation Management Agency** (IMA)	**Base Realignment and Closure** (BRAC)	**U.S. Army Environmental Center** (USAEC)	**Army Material Command** (AMC)	**National Guard Bureau** (NGB)

Goals:

- Update based on current policy
- Update based on AEDB-CC and RACER changes
- Improve usability
- Minimize text

Agenda

- CTC and CC Workgroup
- **CTC Guidance Overview**
- CC Guidance Overview
- Challenges

CTC Guidance Overview

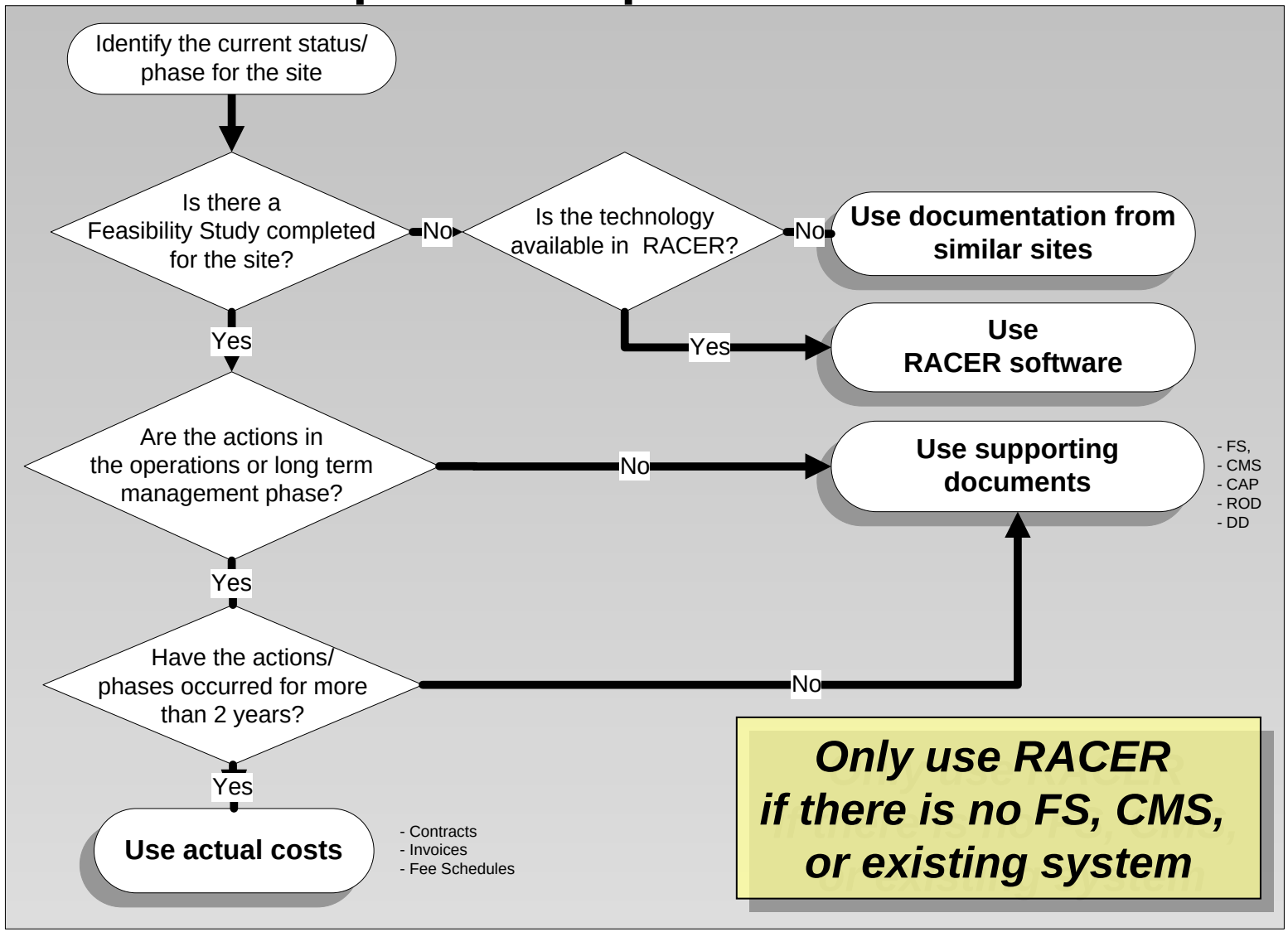
CTC Guidance Purpose

- Help environmental managers understand how to develop cost estimates that assist in meeting financial requirements.
- Provide criteria for preparing, updating, reviewing, and reporting CTC estimates.

CTC Guidance

Process Step	Responsibility/ Approval Level
1 Develop CTC Estimate	Level 5
2 Supervisory Review & Approval Input to AEDB-CC	Level 5
3 Quality Control Review	Level 2/3
4 Quality Assurance Review	USAEC Cleanup PM
5 Approval	Level 2
Validation	Level 1 ACSIM (DEP)

Step1: Develop CTC Estimate



Step 1: Develop CTC Estimate

CTC Estimate Examples

- RACER-generated MFR, RACER estimate with no supporting documentation
- MFR and CMS
- MFR and proposal
- MFR and ongoing/recurring actions — historical/actual costs
- MFR and estimate from similar sites
- MFR and multi-year fixed price contract
- MFR and Fee Schedule (for SI/RI)
  - Task Order
  - CHPPM Services

Step 1: Develop CTC Estimate

Memorandum for Record (MFR)

- What is an MFR?
  - Summary Document that identifies assumptions, supporting documentation, basis for CTC estimate
- What needs to be in an MFR?

Background Information	From historic narrative to identify project conditions
Cleanup Strategy	Assumed approach to reach RIP/RC
Assumptions	Unknown items needed to complete estimate
Calculation Summary	By phase, -includes escalation when appropriate
Quantities	Volumes (CY), numbers (no. of samples) etc.
Cost per Unit	When manually input (dump charges per CY)
Material Changes	Identify/explain changes >±10%
Cost Adjustments	Adjustments to project costs as project unfolds

Step 1: Develop CTC Estimate

RACER-Generated MFR

Cost Summary Report

Assembly	Direct Cost	Marked Up Cost

Site Name: FE186-Temp. Landfill

Site Number: CCFG003

Description: HQ legal counsel in correspondence dated 29 Nov 2001 has determined that this project is required According to(final capping) of the landfill is necessary after the settling process has ended. WHAT IS OUT OF COMPLIANCE: The sanitary landfill was closed in FY00 and temporarily being capped, FY01/02. Recapping is required by FY09 when the trash disposed until FY00 settled. The recapping of this old sanitary landfill is driven by the host nation approval/permit for a new landfill, which was constructed and completed in FY00. CURRENT STATUS: Landfill has temporary cap and is settling. Future costs include the design FY07, and recapping funded in FY08 according to landfill standards. Additional work may be added when final design for recapping which requires regulatory approval is available. IMPACT IF NOT FUNDED: Will not stay in compliance with the approval letter, which will lead to the loss of the permit to operate the landfill.

Program:

Estimator Information:

Name: Katherine Best 9/26/05

Title: Engineer

Agency/Org./Office: Environmental Consulting

Business Address: 123 Little Rd
Portland, ME 04103
USA

Phone: +0[illegible]88 555 1212

Email: [illegible]therine.best@ec.com

Prepared Date: 04/29/2005

Reviewer Information:

Name: Rob Reviewer 9/26/05

Title: Engi[illegible]

Agency/Org./Office: Environmental Consulting

Business Address: 123 Little Rd

Date Reviewed: 04/29/2005

2 signatures/ dates

Cost Summary Report

Assembly	Direct Cost	Marked Up Cost
Total Phase Remedial Design for Capping Landfills	57,275	83,534

Phase Name: RA - Construct permanent cap to landfill

Phase: Remedial Action

Description: Cost estimate based on 16,500m2 and landfill cap approval letter.

Technology: Capping # 1

Comment:

Total area = 16,500m2 = 4.07 acres. Size is approx 1.5 acres x 2.67 acres.
Standard cover with passive gas venting
3:1 side slope assumed
0.5m (20 in) soil cover
80 mil liner (largest available in RACER – a little equivalent to 0.002 m)
0.5 m (20 in) compacted clay liner
6 in leveling layer

The Landfill Capping Ap[illegible]letter stated the following:

Once settlement of the l[illegible]as stopped, the temporary landfill cover has to be upgraded to a final cover in accordance with federal re[illegible]ons. The mineral layer has to have a hydraulic conductivity of less than 1 * 10-9 m/s.

The drainage layer has to be conne[illegible] to the general stormwater sewer system. The drainage layer shall not consist of drainage pipes but of a [illegible]ed drainage layer (grain size 4-32 mm) to ensure complete removal of leachate. The drainage system has to b[illegible]st protected.

Where no settlement occurs a final landfill [illegible] shall be constructed.

There are 3 portions of the Landfill: "Old" requir[illegible] more work. "CP1" = 16,500 m2, and "CP2" requires no further work.

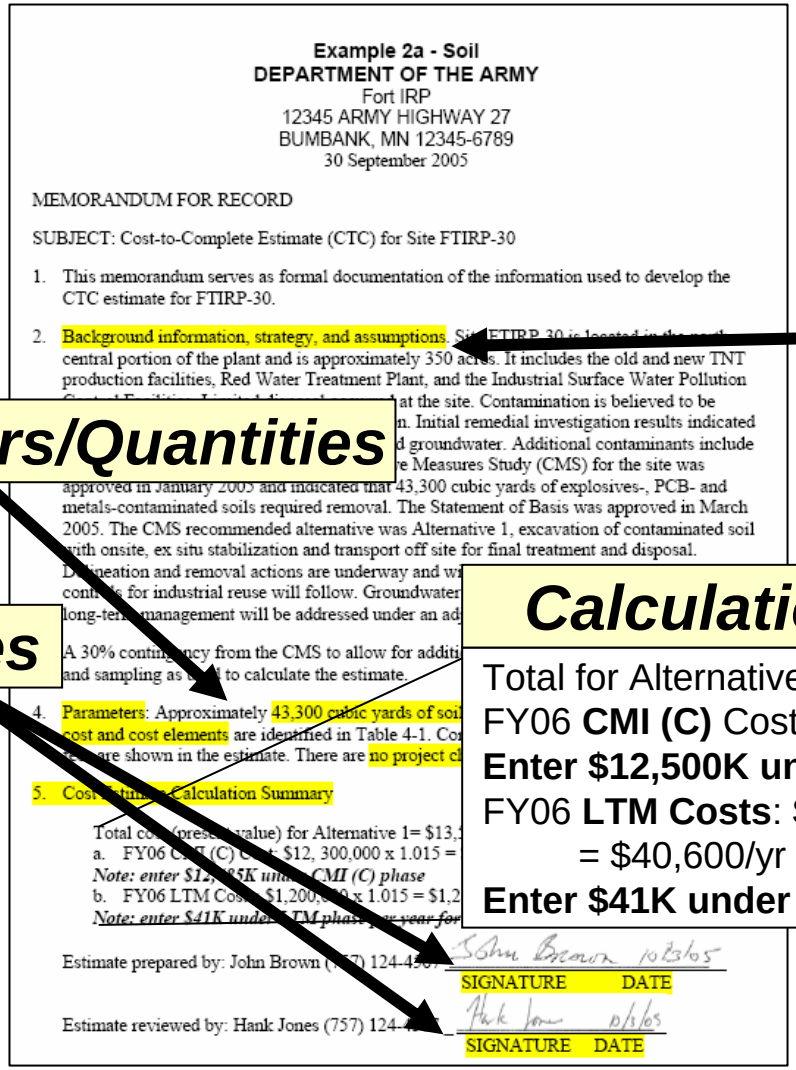
LTM ?

17030423	Unclassified Fill, 6" Lifts, Off-Site, Includ[illegible]e	239,966	314,074
17030426	Sand, 6" Lifts, Off-Site	112,167	146,493
18050301	Loam or topsoil, imported topsoil, 6" deep, fi[illegible]	148,823	194,393
18050402	Seeding, Vegetative Cover	117,358	151,281
33070201	6" Inside Diameter (Vertical Pipe Spaced @ 200 [illegible]	19,915	26,554
33080503	Polymeric Liner Anchor Trench, 3' x 1.5'	2,159	3,215
33080507	Clay 10E-7, 6" Lifts, Off-Site	259,344	341,177
33080513	Landfill gas and leachate control systems, polyeth	138,923	180,951
33080532	8 oz/sy Erosion Control/Drainage Filter Fabric (80	31,604	42,511
33080573	Secure burial cell construction, polymeric liner a	202,427	266,139
Total Capping Technology		1,2[illegible]685	1,666,788
33220143	Public Notice Labor Cost	[illegible]	[illegible]

Document all assumptions in comment fields

Step 1: Develop CTC Estimate

Non-RACER generated MFR



Example 2a - Soil
DEPARTMENT OF THE ARMY
Fort IRP
12345 ARMY HIGHWAY 27
BUMBANK, MN 12345-6789
30 September 2005

MEMORANDUM FOR RECORD

SUBJECT: Cost-to-Complete Estimate (CTC) for Site FTIRP-30

1. This memorandum serves as formal documentation of the information used to develop the CTC estimate for FTIRP-30.

2. Background information, strategy, and assumptions. Site FTIRP-30 is located in the north central portion of the plant and is approximately 350 acres. It includes the old and new TNT production facilities, Red Water Treatment Plant, and the Industrial Surface Water Pollution Control Facilities. Limited disposal occurred at the site. Contamination is believed to be [illegible]n. Initial remedial investigation results indicated [illegible]d groundwater. Additional contaminants include [illegible]e Measures Study (CMS) for the site was approved in January 2005 and indicated that 43,300 cubic yards of explosives-, PCB- and metals-contaminated soils required removal. The Statement of Basis was approved in March 2005. The CMS recommended alternative was Alternative 1, excavation of contaminated soil with onsite, ex situ stabilization and transport off site for final treatment and disposal. Delineation and removal actions are underway and will continue for industrial reuse will follow. Groundwater long-term management will be addressed under an ad[illegible]

A 30% contingency from the CMS to allow for additi[illegible] and sampling as [illegible] to calculate the estimate.

4. Parameters: Approximately 43,300 cubic yards of soil[illegible] cost and cost elements are identified in Table 4-1. Co[illegible] are shown in the estimate. There are no project cl[illegible]

5. Cost Estimate Calculation Summary

Total co[illegible] (present value) for Alternative 1= $13,[illegible]
a. FY06 CMI (C) Cost: $12, 300,000 x 1.015 =
Note: enter $12,485K under CMI (C) phase
b. FY06 LTM Costs: $1,200,000 x 1.015 = $1,2[illegible]
Note: enter $41K under LTM phase per year for

Estimate prepared by: John Brown (757) 124-4[illegible] John Brown 10/3/05
SIGNATURE DATE

Estimate reviewed by: Hank Jones (757) 124-4[illegible] Hank Jones 10/5/05
SIGNATURE DATE

Background, Strategy, Assumptions

Parameters/Quantities

Signatures

Calculation Summary

Total for Alternative 1= $13,500,000
FY06 **CMI (C)** Cost: $12, 300,000 x 1.015 = $12,484,500 FY06$
Enter $12,500K under CMI (C) phase
FY06 **LTM Costs**: $1,200,000 x 1.015 = $1,218,000/30years
= $40,600/yr
Enter $41K under LTM phase per year for 30 years

Step 1: Develop CTC Estimate
Supporting Documentation:
Corrective Measures Study/Feasibility Study

Title Page

Final

Corrective Measures Study

Site FTP-333

Gasoline Gulley, Fort Cleanup, Nev

U.S. Army Corps of Engineers

July 2003

Relevant Report Pages

impacted soil is present at the water table interface and extends approximately 550 ft hydraulically downgradient in a northwest direction to the surface water impoundment. The estimated volume of subsurface soil targeted for corrective action is 12,000 yd^3 in the source area and 10,300 yd^3 adjacent to the source area for a total of 22,300 yd^3. A dissolved-phase groundwater plume extends at least 1,000 ft northwest of the source area.

The media targeted for remediation includes subsurface soil, groundwater, surface water, and sediment. As required by the State Department of Environmental Quality, the primary corrective action objectives (CAOs) will be to remediate the site to the extent practicable (i.e., technologically and fiscally feas

- **Surface and Subsurface Soil**—Determination of Soil Cleanup
- **Groundwater**—Achieve State (COCs) in groundwater state,
- **Surface Water**—Achieve State surface water standards for COCs in surface water, and
- **Sediment**—Achieve the criteria set forth in the State Technical Guidance for Screening Contaminated Sediments.

The goal of this Corrective Measures Study was to develop, screen, and evaluate potential corrective measure alternatives for the site that are protective of human health and the environment and are capable of meeting the CAOs.

Quantities

Selected Alternative

Costs

Alternative 5 Cost Summary

Phase	Type	Unit Cost	Number of Years	Total Cost
RA(C)	SVE/BV	$585,961	1	$585,961
	AAS	$300,438	1	$300,438
	Excavation	$853,780	1	$853,780
Subtotal				**$1,740,179**
RA(O)	Operation	$152,840	7	**$1,069,880**
Subtotal				
RA(O)	(4-GW monitoring wells)	$100,400	10	$1,004,000
Annual progress meeting		$3,000	10	$30,000
Subtotal				**$1,034,000**
LTM	Annual	$22,540	20	$450,800
LUC		$22,500	1	$22,500
5-year review meeting		$25,500	6	$153,000
Annual progress meeting		$3,000	20	$60,000
Subtotal				**$686,300**

Phase	Total FY03 Costs	Escalation Factor	Total FY06 Costs	Annual Costs
RA(C)	$1,740,179	1.0416	$1,812,570.45	
RA(O)	$1,069,880	1.0416	$1,114,387.01	$159,198.14
RA(O)	$1,034,000	1.0416	$1,077,014.40	$107,701.44
LTM	$686,300	1.0416	$714,850.08	$35,742.50
Total	$4,530,359		$4,718,821.93	

Step 1: Develop CTC Estimate

Supporting Documentation: Proposal

Scope of Work

Activities

Quantities

Costs

Fort IRP, RAP Implementation
Scope of Work, FY 2006-2008
May 2005

Introduction

A C… …RAP) at Fort IRP site CC… …roved by the State Dep… …site remedial action inv… …agent. An area of approximate… 422,400 cubic feet of facility groundwater at FL001 is known to be contaminate… with benzene, toluene, ethyl benzene, total xylenes, naphthalene, 1-methylna…alene, 2-methylnapthalene, 1,2-dichloroethane, and Total Petroleum …rocarbons (TPH). The Contractor shall provide all labor, materials, and equip… necessary to complete the tasks presented below from the SDEP approved RA… for the time period of July 1, 2006 to September 30, 2008.

Site security issues and project working c… Fort IR… poi… of contact (POC) for this… practic… rela…ve to worker health and … follows. The Contractor will restore the s… cleaning up a… removing all project related trash, debris, etc.

Description of Tasks

Task 1: Groundwater Monitoring

The Contractor will collect and analyze samples from MW-1 through MW-5, MW-11 through MW-14, and DMW-1 quarterly for four sampling events during the period of this contract. Analyses of these quarterly samples will be performed for the parameters specified in Section 5.3.1 of the RAP and subsequent SDEP correspondence/directives.

Samples will be collected in accordance with SDEP SOP for Field Activities, dated January 2002 and latest updates, and with the Contractor's Quality Management Plan. Field forms established by SDEP for petroleum cleanups will be used for sampling activities.

Task 2: Reporting and Record Keeping

The Contractor will prepare the following reports under this SOW during the term of this remedial action. Two copies of each report will be submitted to the Fort IRP, one for Fort IRP records retention, and one for forwarding to the SDEP:

Ten (10) quarterly reports that summarize field and analytical data collected from the quarterly sampling events. Contaminant contour maps with injection and monitoring well locations and groundwater gradients will be included in these reports.

Fort IRP RAP Implementation (CMI (O)), 7/1/06 - 9/30/06

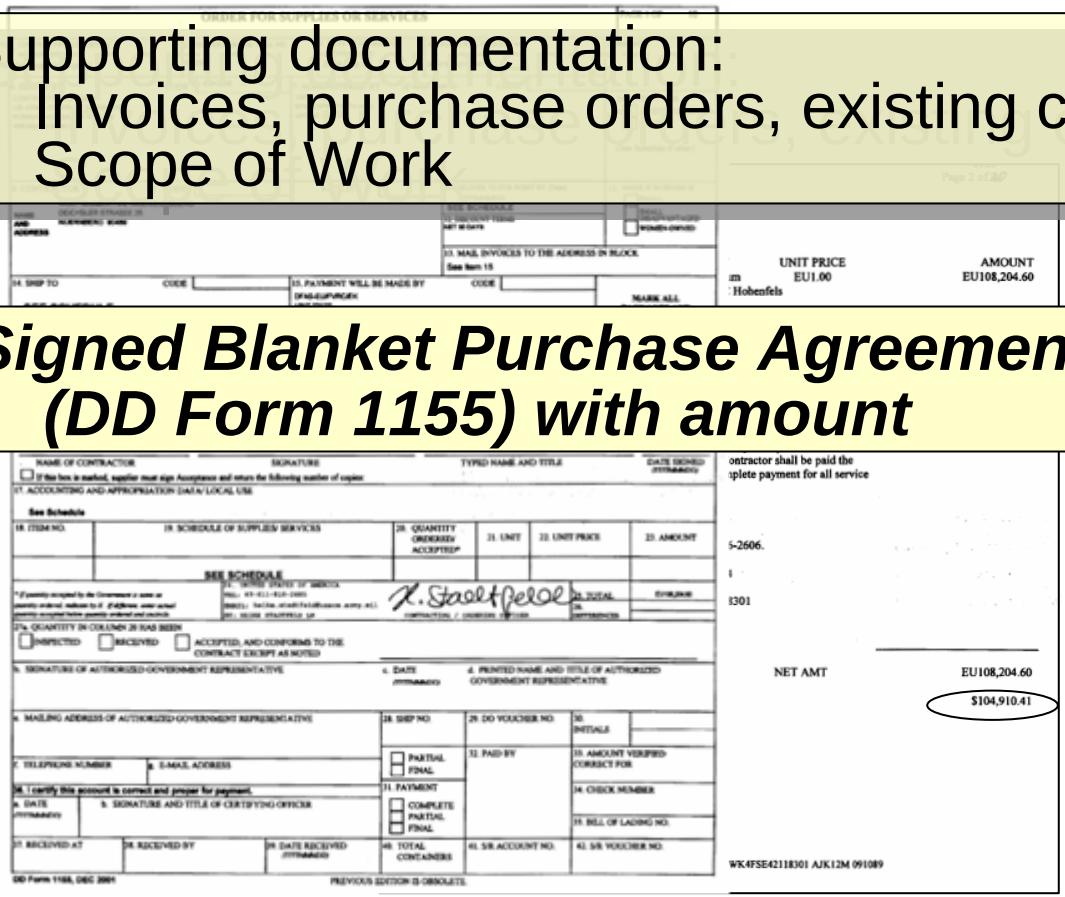
			SOURCE	COST	LABOR			CATEGORY	TOTAL
	DESCRIPTION	SOURCE	NAME	BASIS	COST	UNITS	QTY.	SUB TOTAL	TASK
Labor	Program Manager	SpecPro Employee			$ 105.67	hour		$ -	
	Sr. Project Manager	SpecPro Employee			$ 98.44	hour	16	$ 1,575.04	
	Regulatory Analyst/Speci	SpecPro Employee			$ 70.60	hour	16	$ 1,129.60	
	Env Information Specialis	SpecPro Employee			$ 52.55	hour	8	$ 420.40	
	Env Technician	SpecPro Employee			$ 45.94	hour	48	$ 2,205.12	
	Subtotal: Direct Labor								$ 5,330.16
	DESCRIPTION			COST BASIS	ODC RATE	UNITS	QTY.	CATEGORY SUB TOTAL	TOTAL TASK
ODCs	Well Sampling Supplies			per event	$ 100.00	# of events	2	$ 200.00	
	Per Diem			per day	$ 91.00	days	6	$ 546.00	
	Mileage			GSA rate	$ 0.405	miles	1500	$ 607.50	
	Printing/Binding			per copy	$ 25.00	each	4	$ 100.00	
	Subtotal ODCs								$ 1,453.50
G&A	*Subtotal: General and Administrative*				15.38%				$ 223.55
	DESCRIPTION	SOURCE	SOURCE NAME	COST BASIS		UNITS	QTY.	CATEGORY SUB TOTAL	TOTAL TASK
	Laboratory Analysis w/ Q…	Subcontractor	Accutest	per event					
					$ 60.00	each	20	$ 1,200.00	
					$ 56.00	each	14	$ 784.00	
					$ 96.00	each	8	$ 768.00	
					$ 84.00	each	4	$ 336.00	
	Duplicates				$ 296.00	each	2	$ 592.00	
									$ 3,680.00
	Subtotal: Subcontractors								$ 3,680.00
M/H	*Subtotal: Material Handling on Subcontractors/Consultants*				3.60%				$ 132.48
G&A on M/H	*Subtotal: General and Administrative Overhead on Material Ha*				15.38%				$ 20.38
	Subtotal: Subcontractor/Consultants with Overheads								$ 3,832.86
									$10,840.06

Step 1: Develop CTC Estimate

Ongoing/recurring actions: Historical/Actual costs

Supporting documentation:
- Invoices, purchase orders, existing contracts, vouchers,
- Scope of Work

Signed Blanket Purchase Agreement (DD Form 1155) with amount



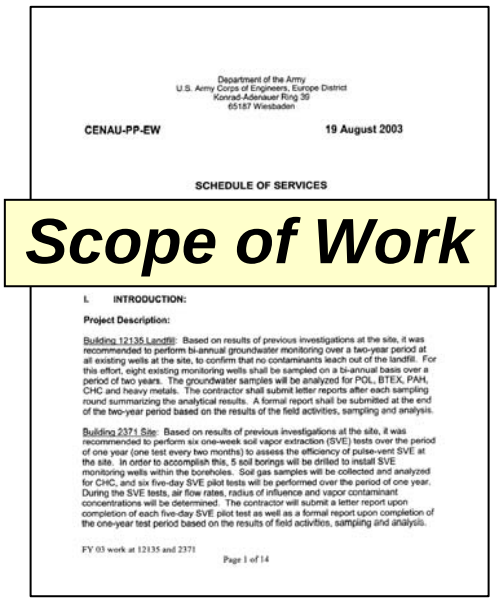
UNIT PRICE EU1.00 AMOUNT EU108,204.60

NET AMT EU108,204.60

$104,910.41

WK4FSE42118301 AJK12M 091089

Scope of Work



Department of the Army
U.S. Army Corps of Engineers, Europe District
Konrad-Adenauer Ring 39
65187 Wiesbaden

CENAU-PP-EW 19 August 2003

SCHEDULE OF SERVICES

I. INTRODUCTION:

Project Description:

Building 12135 Landfill: Based on results of previous investigations at the site, it was recommended to perform bi-annual groundwater monitoring over a two-year period at all existing wells at the site, to confirm that no contaminants leach out of the landfill. For this effort, eight existing monitoring wells shall be sampled on a bi-annual basis over a period of two years. The groundwater samples will be analyzed for POL, BTEX, PAH, CHC and heavy metals. The contractor shall submit letter reports after each sampling round summarizing the analytical results. A formal report shall be submitted at the end of the two-year period based on the results of the field activities, sampling and analysis.

Building 2371 Site: Based on results of previous investigations at the site, it was recommended to perform six one-week soil vapor extraction (SVE) tests over the period of one year (one test every two months) to assess the efficiency of pulse-vent SVE at the site. In order to accomplish this, 5 soil borings will be drilled to install SVE monitoring wells within the boreholes. Soil gas samples will be collected and analyzed for CHC, and six five-day SVE pilot tests will be performed over the period of one year. During the SVE tests, air flow rates, radius of influence and vapor contaminant concentrations will be determined. The contractor will submit a letter report upon completion of each five-day SVE pilot test as well as a formal report upon completion of the one-year test period based on the results of field activities, sampling and analysis.

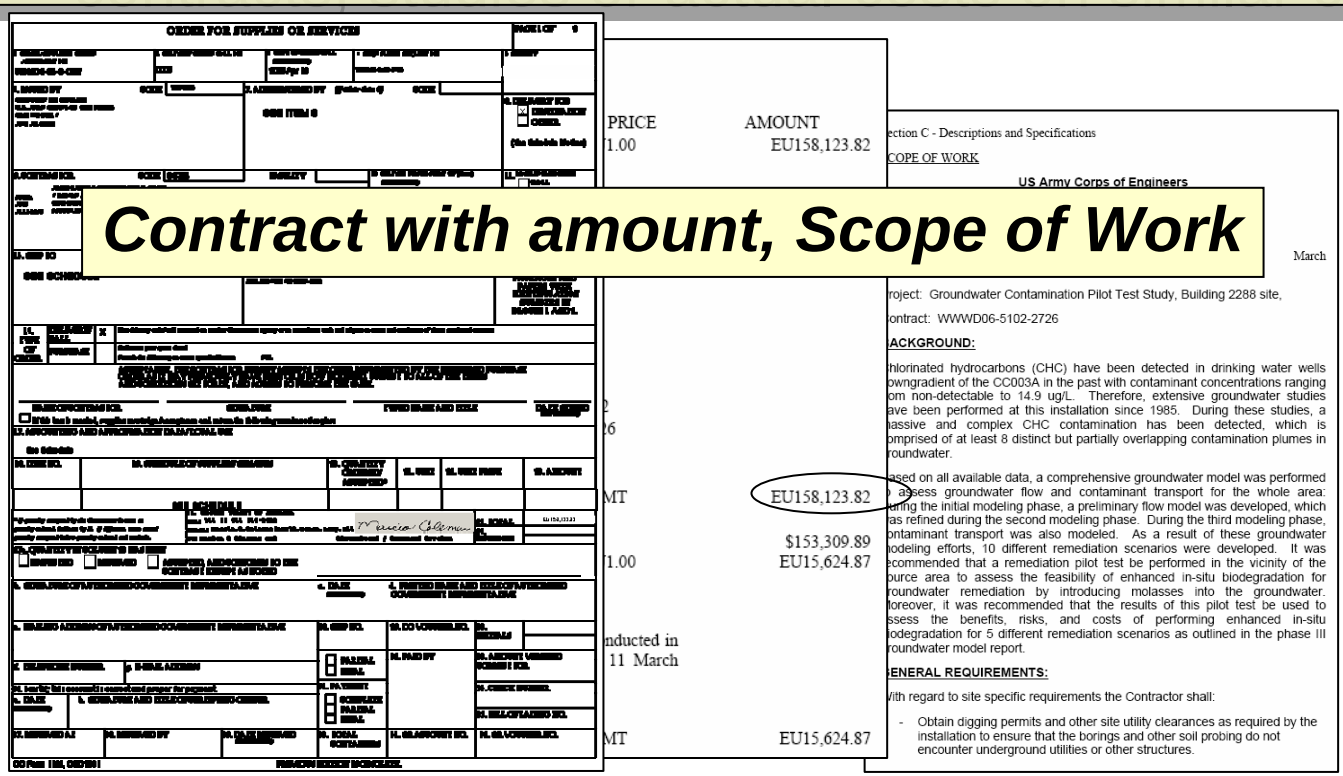
FY 03 work at 12135 and 2371

Page 1 of 14

Step 1: Develop CTC Estimate

Similar sites

Supporting documentation:
- contracts, studies or actual costs on similar completed sites



ORDER FOR SUPPLIES OR SERVICES

PRICE AMOUNT
1.00 EU158,123.82

MT EU158,123.82

$153,309.89
1.00 EU15,624.87

nducted in
11 March

MT EU15,624.87

ection C - Descriptions and Specifications

COPE OF WORK

US Army Corps of Engineers

March

roject: Groundwater Contamination Pilot Test Study, Building 2288 site,

ontract: WWWD06-5102-2726

ACKGROUND:

hlorinated hydrocarbons (CHC) have been detected in drinking water wells owngradient of the CC003A in the past with contaminant concentrations ranging om non-detectable to 14.9 ug/L. Therefore, extensive groundwater studies ave been performed at this installation since 1985. During these studies, a assive and complex CHC contamination has been detected, which is omprised of at least 8 distinct but partially overlapping contamination plumes in roundwater.

ased on all available data, a comprehensive groundwater model was performed assess groundwater flow and contaminant transport for the whole area: uring the initial modeling phase, a preliminary flow model was developed, which as refined during the second modeling phase. During the third modeling phase, ontaminant transport was also modeled. As a result of these groundwater odeling efforts, 10 different remediation scenarios were developed. It was ecommended that a remediation pilot test be performed in the vicinity of the ource area to assess the feasibility of enhanced in-situ biodegradation for roundwater remediation by introducing molasses into the groundwater. oreover, it was recommended that the results of this pilot test be used to ssess the benefits, risks, and costs of performing enhanced in-situ iodegradation for 5 different remediation scenarios as outlined in the phase III roundwater model report.

ENERAL REQUIREMENTS:

ith regard to site specific requirements the Contractor shall:

- Obtain digging permits and other site utility clearances as required by the installation to ensure that the borings and other soil probing do not encounter underground utilities or other structures.

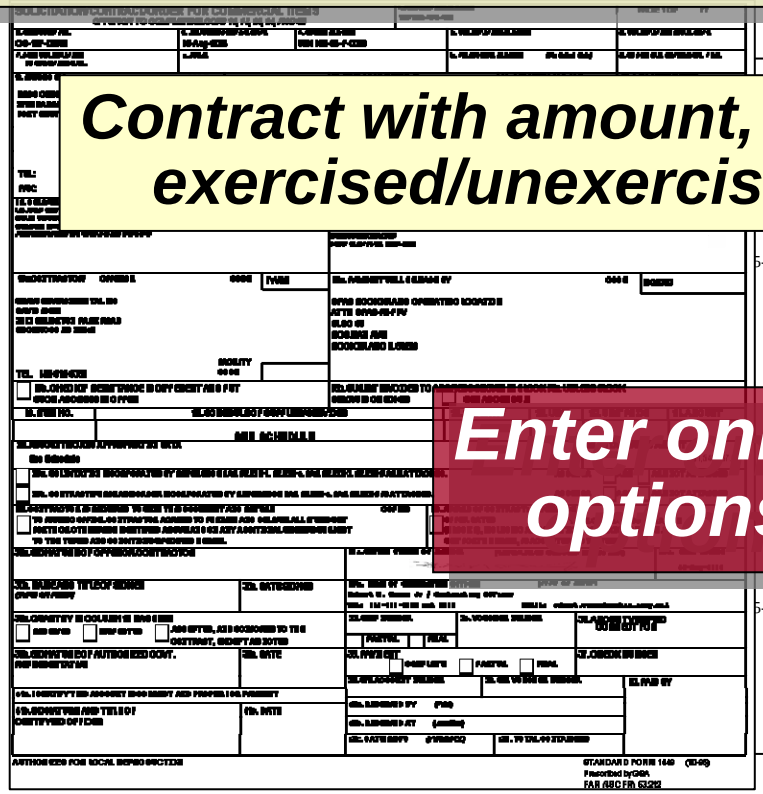
Contract with amount, Scope of Work

Step 1: Develop CTC Estimate

Multi-Year Fixed Price Contracts

Supporting documentation:
- Base contracts and contract modifications

Contract with amount, Scope of Work, exercised/unexercised options



Enter only unexercised options in AEDB-CC

Do NOT escalate costs

Step 2: Supervisory Review and Approval

- Supervisory Review Checklist must be signed/dated:
  - For IMA, MACOMS, and Excess Installations: must be government employee at the installation environmental office
  - For ARNG facilities: Chief of staff or designee
- Checklist includes all CC sites at the installation
- Upload the checklist at the installation level
- Must be legible and downloadable

CTC Guidance Overview: Supervisory Review and Approval

1. Are Sound estimating methodology and reasonable assumptions used? Does the database of record (i.e. AEDB-CC or AEDB-R) capture and document the assumptions used to develop the IAP and CTC. Does the information in the database match the information in the IAP?

2. Did the estimator compare prior year estimates to the current year estimates and *address QC Comments*?

3. Does the estimate include all relevant phases and costs to complete the cleanup?

4. Is the estimate consistent with the operational plans of the Army?

5. Does the estimator have the proper qualifications and required training to compile/generate the estimate?

CTC Guidance Overview: Supervisory Review and Approval

6. Is there an adequate audit trail?

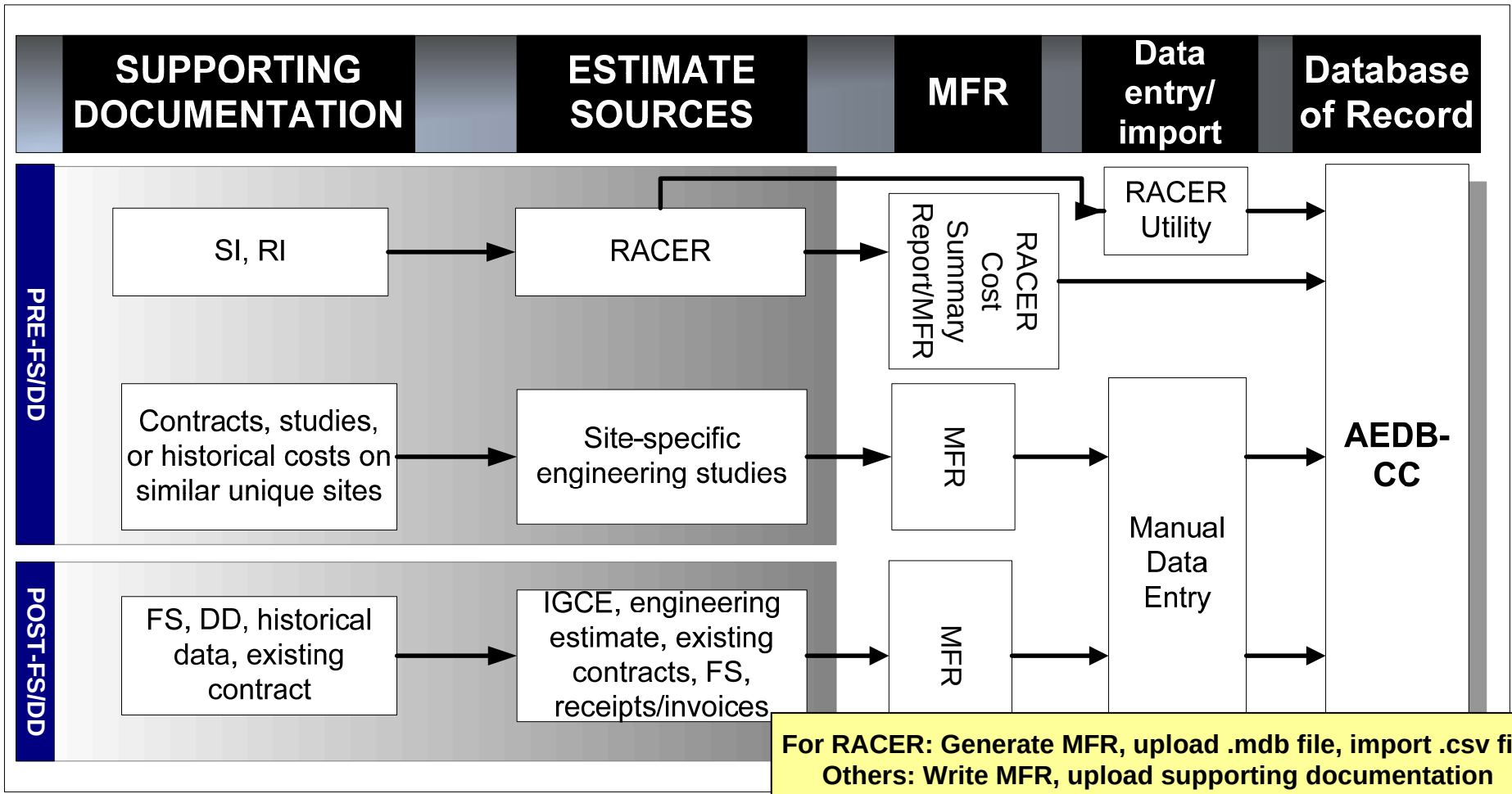
7. Is there adequate documentation to support the underlying assumptions used to develop the estimate?

8. Does the supervisor agree with the underlying assumptions made to develop the estimates?

9. Is the estimate maintained in the current cost basis?

10. Is or was the site listed in a different database of record (i.e. AEDB-CC, AEDB-R) for a previous data call?

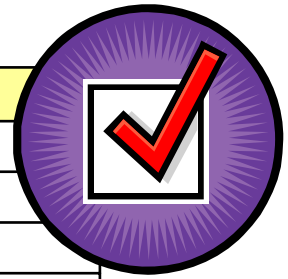
Step 2: Input in AEDB-CC



Steps 3 and 5: Quality Control Review and Approval

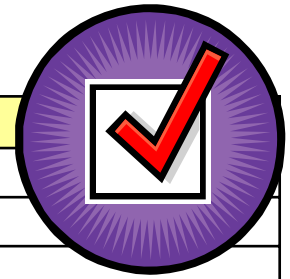
- Based on Supervisory Review Checklist.
- Document and sign review comments
  - IMA: IMA Region/HQ Environmental Office
  - MACOMs: Major Subordinate Command (MSCs)
  - Excess Installations: BRAC Field Office
  - NGB: NGB Cleanup Branch
- QC Checklist, comments in AEDB-CC provided to installations to address.
- Acceptable sites approved.

Steps 3 and 5: Quality Control Review and Approval QC Checklist



1. General Information - Does the Site/Historic narratives contain the following?
a. Site Conditions (e.g. soil, groundwater)
b. Type contamination
c. Current contaminant levels
d. Correct Law, reg, order, statute, or driver mandating cleanup
e. Proposed Cleanup strategy
f. Key documents supporting the strategy
g. Past uses, types of activities (processes), and occupants
h. Environmental history (e.g. investigations, known releases, sampling, cleanup actions, closures.)
2. Remedial Actions
a. Do the remedial actions make sense?
b. Do the remedial actions address what was discussed in the narrative?
c. Are they consistent with the phase schedules?
3. Phase Schedule
a. Is it reasonable and achievable (studies relative to the actions)?
b. Is it consistent with the funding spread and remedial actions (i.e., dates correct)?
c. Is it consistent with the cleanup strategy in the narrative?

Steps 3 and 5:
Quality Control Review and Approval
QC Checklist



4. Cost Estimate & Requirements
a. Has correct Estimate Source been identified?
b. Is an Estimate Source narrative provided?
c. Have material changes (cost change +/- 10%) been adequately explained? (if applicable)
d. Have zero cost estimates been explained? (if applicable)
e. (Spring only) Is the information in the database consistent with the information in the IAP and CTC spreadsheet?
h. Has an adequate CTC source document been uploaded ?
f. Is it complete and legible and does it support the estimate?
g. If RACER was used, was the .mdb file imported correctly?
h. Were obligations entered?
5. Memorandum for Record (MFR)
a. Does the MFR support the estimate and explain assumptions?
b. Does the MFR have two signatures?
c. Does the MFR contain and explain [required information]

Steps 3 and 5: Quality Control Review and Approval

QC Checklist

6. Supervisory Review Checklist
a. Is a supervisory review checklist attached, legible, signed, and dated?
b. Are the correct sites and Site IDs listed?
7. Program Management Costs
a. Have the Program Management Costs been entered?
b. Do they look reasonable (i.e., 8-10% of annual costs)?

Step 4: Quality Assurance Review

- Based on Supervisory Review Checklist
  - Documentation
  - Audit trail
  - Qualification of Estimators
  - Supervisory Review
  - CC Program Manager's findings identified in the QC Review.

- QA comments provided to installations to address.

Agenda

- CTC and CC Workgroup
- CTC Guidance Overview
- **CC Guidance Overview**
- Challenges

CC Guidance Overview

CC Guidance Purpose

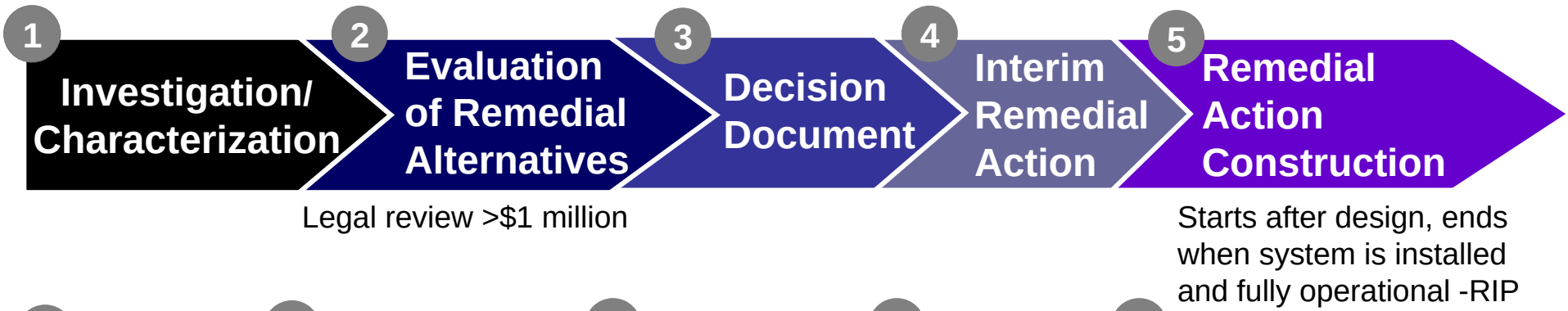
- Assists Army personnel in meeting the challenge of planning and executing the CC program.
- It provides instructional guidance on programming CC requirements.

CC Guidance Overview

- Site eligibility
  - Typical eligible and ineligible projects
- Responsibilities
  - Focus on the Remedial Project Manager (RPM)
- Program Management
  - Installation Action Plans (IAP) - see new IAP Guidance
  - CTC Estimate – see CTC Guidance
  - Programming Requirements
    - Program Management
    - Site Projects

CC Guidance Overview

Cleanup Process Overview



Legal review >$1 million

Starts after design, ends when system is installed and fully operational -RIP

Ends when objectives are met - RC

Starts after remedial objectives have been met

Date, NFA documentation

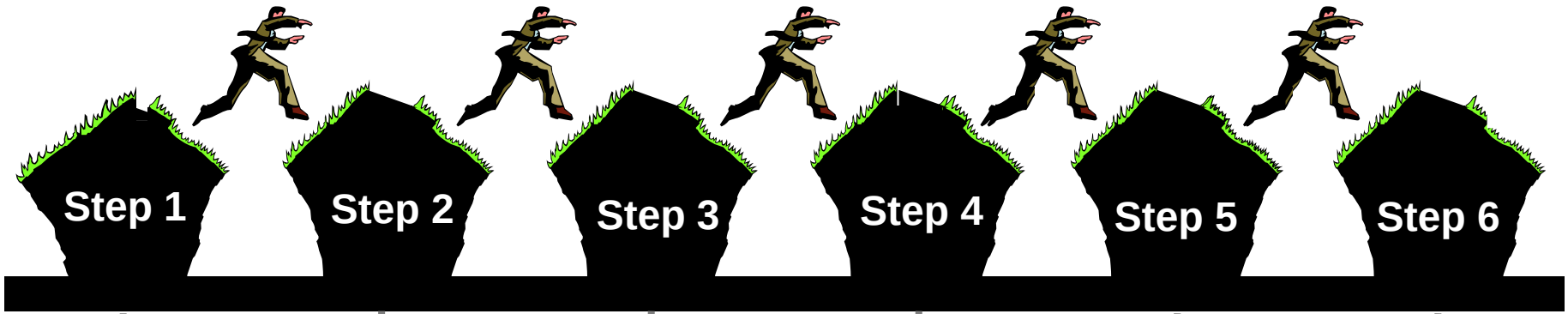
Required documentation in PCDR and files

-***Defines what's in each phase***

- ***Identifies start and end dates milestones (RIP, RC) for each***

CC Guidance Overview

CC Site Submission Process



Step 1	Step 2	Step 3	Step 4	Step 5	Step 6
Enter site in AEDB-CC	Enter Funding Reqs	Re-Program Unfunded Reqs	Enter Obligated Funding	Address QC Comments	Submit for Approval

CC Guidance Overview

- Specific Recommendations
  - Air sparging and soil vapor should be used together
  - For RACER estimates for Soil removal/disposal at UST sites, use Load and Haul
  - For RACER excavation, the cubic yards excavated and disposed of may vary (CY vs LCY)
  - MNA is entered in RA(O)
  - Program Management should be 8-10% of annual site costs

Agenda

- CTC Workgroup
- CTC Guidance Overview
- CC Guidance Overview
- **Challenges**

Challenges

- Capturing obligations (use the new DFAS codes)
- Proper documentation for each site
  - RACER estimate
  - MFR
  - Supporting Documentation
  - Supervisory Review Checklist
- Aligning database and RACER functionality

Questions?

BACKUP SLIDES

CC Guidance Overview: Site Eligibility

- Eligible sites
  - Documented release
  - Beyond initial response
  - Leaking UST after confirmatory sampling
  - CERCLA not eligible for DERP
  - RCRA corrective actions, known contamination, Non-DERP
  - RCRA corrective actions at closed permitted facilities, confirmed release
  - Post CC project monitoring and maintenance, RIP
  - Responses to MEC at non-operational ranges (not MMRP eligible) when necessary to protect human health and environment

CC Guidance Overview: Site Eligibility

- Ineligible sites
  - Preliminary Assessments
  - Initial spill response
  - Permit required closure activities
    - Landfill monitoring when there has not been a release
  - Tank Removal
  - Eligible for DERP
  - Responses to MEC at operational ranges
  - Environmental Baseline Surveys
  - Building demolition or debris removal
  - Routine hazardous waste management
  - Operating Permit fees and associated monitoring
  - Plans other than for corrective action