Expediting Cleanup through a Core Team Approach

This guide is primarily intended for personnel with project management responsibility for Department of Energy (DOE) and Department of Army (DA) environmental restoration (ER) projects conducted pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Resource Conservation and Recovery Act (RCRA). It describes how Principle 1: *Building an effective core team is essential*, when integrated with the other three DOE/DA/EPA "Principles of Environmental Restoration," will streamline the remedy selection process and enhance cleanup decisions.

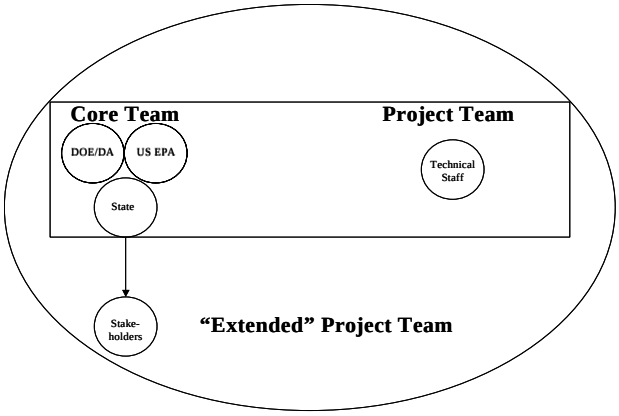
What is a core team approach?

The "core team approach" is a formalized, consensus-based process in which those individuals with decision-making authority, including DOE/DA, USEPA, and State remedial project managers, work together to reach agreement on key remediation decisions. Equally important, the core team works to ensure that all technical support staff and stakeholders are involved and communicating effectively throughout the decision-making process.

Working together as a team does not change the role or responsibilities of the agency representatives – e.g., participation of regulators on a core team in no way limits their discretion to use whatever enforcement authorities they may deem appropriate over the course of a project; similarly, DOE/DA personnel maintain sole responsibility for managing a project's available resources. What the core team approach does is improve communication between all parties so that regulators can more effectively oversee and direct, as appropriate, remedial progress.

The core team and their technical staff (site contractors and the federal and state technical support personnel) comprise the ***project team***. Essential to the decision-making process, support personnel not only provide the information necessary for the core team to make technically defensible decisions (e.g., analysis of characterization data, technology evaluations), they also execute the work as directed by the core team. ***Stakeholders*** include any member of the public or designated entity (e.g., restoration advisory boards) who has an interest in the cleanup project and wishes to participate in the remedy selection process. Although the various regulations governing cleanup explicitly require public participation at specific points in the decision-making process, the core team should solicit stakeholder input at <u>any</u> point in the process that they believe is appropriate. In this light, stakeholders may be viewed as an "extension" to the project team – i.e. that they also help to guide the work performed by identifying those uncertainties or concerns they want addressed as part of the remedy selection process. This relationship between the core team, project team, and stakeholders is illustrated in Figure 1.

Figure 1. The Core Team Approach
What makes the core team approach different?



Historically, many project teams have established and implemented characterization strategies, identified a preferred cleanup alternative, and prepared supporting documentation without the full input of their regulators and other important stakeholders. As a result, meetings between the project team and the regulators too often have been used to discuss the adequacy of documents

(e.g., remedial investigation reports, baseline risk assessments), rather than serving to build consensus on the appropriate scope and direction of the investigation and cleanup before documentation is prepared. As could be expected, the work performed has often been considered inadequate or misdirected, inevitably resulting in schedule delays, increased costs, and reduced confidence in the project's execution.

In contrast, the core team approach emphasizes clear communication "in person" before analyses are conducted, thus ensuring each member of the core team is provided an opportunity to express his or her views or concerns (e.g., perceptions of risk, questions regarding site uncertainties). As a result, misinterpretation or misunderstandings are minimized and important issues and concerns can be immediately resolved and addressed, leading to a better investigation strategy or remedial approach that is agreeable to all. In addition, the project team better understands the rationale behind the decisions due to their direct involvement in these decision-making meetings and, consequently, they can better execute the work. Finally, stakeholders concerns can be addressed more effectively because their thoughts and views are solicited before planning is complete and the work is performed.

What are the characteristics of an *effective* core team?

Although many project teams have evolved in their approach to interacting with their regulators and stakeholders (e.g., by conducting joint cooping meetings, sharing draft documentation earlier), meetings often remain highly reactive as regulators "respond" to proposals (often for the first time in documents) rather than developing the proposals together. Meeting regularly to scope and direct projects does not necessarily mean a team is communicating well or effectively working together to move a project forward. Characteristics of a truly effective core team are outlined below.

1. There is ***clear recognition of the core team's decision-making responsibility*** by all parties involved. As signators to Federal Facility Agreements and the cleanup decisions generated thereby, the core team constitutes the decision-making authority for a project. After providing input on an issue, technical support personnel and other stakeholders allow the core team to fully weigh the information provided and develop their recommended course of action.

2. The ***core team clearly identifies which key decisions they will make*** and which decisions they intend to delegate to the technical support staff. (See Highlights 1 and 2.) Consequently, it is clear to all parties involved when an issue must be brought to the core team for resolution and when the project team has the authority to proceed.

Highlight 1. Core Team Decisions.

There are a number of decisions that must be made during the course of any remedial project that inherently are the responsibility of the core team. Six such decisions include:

1. Is there a problem requiring action?
2. What specifically is the problem requiring action?[1]
3. What are the appropriate actions to consider?[2]
4. What uncertainties must be reduced prior to selecting a remedy and what uncertainties can be managed during remedy implementation?[3]
5. What information will be used to demonstrate when the action is complete (i.e., response objectives have been achieved)?
6. What information will be used to trigger implementation of an alternative remedial action should the selected remedy fail to meet response objectives?

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[1] See related fact sheet, *Expediting Cleanup through Problem Identification and Definition*.

[2] See related fact sheet, *Expediting Cleanup through Early Identification of Likely Response Actions.*

[3] See related fact sheet, *Uncertainty Management: Expediting Cleanup through Contingency Planning*.

Highlight 2. Example Decisions that May Be Delegated to Technical Staff

1. Specific location of wells or sampling in areas where terrain or structures must be accommodated.
2. Implementation of field options.
3. Implementation of precautionary measures to address health and safety concerns arising in the field.

3. The ***core team makes decisions based on consensus*** as each core team member has an "equal vote." Consensus means agreement on an option

that each core team representative can accept, but not necessarily an agency's most preferred approach – i.e., a willingness to compromise is exhibited as necessary to keep projects moving and expedite cleanup.

4. ***There is no ambiguity in the core team's intent***, minimizing the potential for misinterpretation by the technical staff. The core team clearly defines the scope and specifics of every decision, delineating where appropriate, the criteria or data required to demonstrate that a particular action is warranted or that an objective has been met.

5. The ***core team representatives have sufficient decision-making authority*** so that agreements typically are not overturned by management. Furthermore, once the agencies have agreed to a decision, that decision is not revisited unless new data or information become available which draw into question the validity of key assumptions that were relied on in making the decision.

   [Note: Even when sufficiently empowered, core team representatives typically need formal management approval prior to finalizing significant decisions – e.g., decisions that hold substantive implications with respect to resources or stakeholder concerns. In such situations, the first order of business at the following core team meeting is to confirm whether management for all agencies supports their decision(s). If not, the core team must first resolve management concern(s) and again reach a mutually-agreeable solution <u>before</u> proceeding.]

6. ***Core team members and their technical staff attend <u>all</u> meetings.*** Because core team decisions are based on consensus, there is little, if any, value in holding a meeting if one of the core team representatives is absent since decisions can not be finalized. Relatedly, when decisions are being made which will affect work scope, the technical support staff who will be conducting the work, or providing the technical expertise to assist the core team in defining the scope, should be in attendance. Their direct involvement with a decision will help to ensure they fully understand the rationale underlying that decision, and thus are able to more efficiently implement it.

7. All ***core-team decisions, and the rationale underlying these decisions, are documented*** immediately following each meeting. Documenting core team decisions serves three primary purposes.

   First, it provides an additional opportunity to confirm the specifics of what was agreed to orally and further minimizes the potential for misinterpretation.

   Second, it will often serve as the basis for any required documents (e.g., Work Plans, RODs). Lastly, it provides the necessary background should any of the individuals participating on the core team change over the life of the project.

What are the benefits of a core team approach?

By working together in a cooperative manner and ensuring all decisions are clearly communicated to the project team and stakeholders, the core team achieves a number of benefits.

Improves project focus. Because the core team identifies information needs and investigative / analytical strategies together, the likelihood of collecting unnecessary data is minimized. Similarly, the probability that all information needs will be satisfied increases. As a result, the analyses are performed more effectively, targeting those uncertainties they were intended to address.

Streamlines documentation. Because project focus is improved and less work has to be performed, less documentation is required. Furthermore, the core team reaches consensus on what work is to be done before documentation is prepared. Therefore, generated reports serve to reflect and document decisions rather than simply constitute compilations of all available information.

Minimizes comment/review/revise process. Because there is less documentation to review, and what is generated reflects previous core team agreements, regulators can quickly confirm the adequacy of generated reports.

Minimizes rework/wasted effort. Because the core team jointly scopes and directs projects, and stakeholders provide input prior to decisions being finalized, there is less likelihood of encountering late-stage objections requiring additional work or changes in project direction.

All of these benefits culminate in more rapid attainment of the ultimate objective of ER projects -- expedited implementation of those remedial measures required to ensure the protection of human health and the environment.