



The Navy's Quality Document Review (QDR) Program

March 2020

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- **Presentation is being recorded**
- **Complete the webinar survey (main feedback mechanism)**

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Speaker Introduction



Paul Landin, P.E. NAVFAC ATLANTIC Environmental Engineer.

Paul has 20+ years' experience in solid/hazardous waste, landfills, site investigations, remedy evaluation and selection, and technical review.

He has private industry experience of 15+ years supporting NAVFAC as a contractor.

He joined LANT in December 2015 serving as SME reviewer for alternative/remedy evaluations, providing technical support, and serving as project manager for Historical Radiological Assessments (HRAs)

Participates in the Navy's Radiological and Optimization Workgroups.

Paul has a BS Civil Engineering (Virginia Tech)

OER2 Webinar Series



• Why Attend?

- Obtain and hear about the latest DOD and DON's policies/guidance, tools, technologies and practices to improve the ERP's efficiency
- Promote innovation and share lessons learned
- **FEEDBACK** to the ERP Leadership

• Who Should Attend?

- ERP Community Members: RPMs, RTMs, Contractors, and other remediation practitioners who support and execute the ERP
- Voluntary participation

• Schedule and Registration:

- Every other month, 4th Wed (can be rescheduled due to holidays)
- Registration link for each topic (announced via ER T2 email)

• Topics and Presenters:

- **ERP community members** to submit topics (non-marketing and DON ERP-relevant) to POCs (Gunarti Coghlan – gunarti.coghlan@navy.mil or Tara Meyers – tara.meyers@navy.mil)
- Selected topic will be assigned Champion to work with presenter



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Overview of the Process



- **HQ Policy (Letter 5090 Ser EV/006 15 June 2018)**
 - **Defined document review process**
 - **Intended to ensure programmatic consistency, high quality, and technical validity (optimization emphasis in alignment w/policy)**
 - Leverages technical resources available across NAVFAC ER community with SMEs from all echelons
 - **Applies to all cleanup efforts conducted at DON Active IRP Sites**
 - CERCLA, RCRA, and State equivalent documents that directly or indirectly evaluate, select, or modify a remedy or path forward, such as:
 - Feasibility Studies (FS)
 - Proposed Plans (PP)
 - Records of Decision (ROD)
 - Time-Critical Removal Actions (TCRA)
 - Engineering Evaluation/Cost Analysis (EE/CA)
 - Five Year Reviews (FYR)
 - **Encourages collaboration & feedback**
 - RPMs, Contractors, SMEs, Supervisors, and ER Managers

What Documents Require QDR?



– Tier 1 Criteria (more critical)

• Precedence Setting

- Site Reopener
- Off-base Treatment
- New/Emerging Technology
- New/Expansion of Pump & Treat
- Implementation of Standard Uncommonly Used for Cleanup Goal
- Implementation of Low/Potentially Unachievable Cleanup Goal
- Red Flags in Remedial Action Objective (RAO) Language

Any project or approach that has not been done by the Navy before and will create precedence if approved. New P&T systems are included because these systems are being phased out with exception of special cases

• Emerging Issues

- Emerging Contaminants
- PFAS
- VI
- Chemicals with no clear risk information

Any project that may have emerging issues that may not have specified criteria to clean up. RPMs should not have to guess the correct path forward, since there is no agreed upon path at this time

• Public/Regulatory/Political Interest

- Projects with public, political or regulatory negative attention that could be a liability

Any project that could create public, political or regulatory negative attention that could potentially become a future liability

What Documents Require QDR? (con't)



– Tier 2 Criteria

- **Large quantities/complex soil & sediment excavation**

- >1500 yds³
- ER,N projects, not MILCON

Any that requires large quantities of soil/sediment to be removed. Toxicity, risk levels, clean up goals can be evaluated.

- **Response Complete (RC) >20 yrs**

- Excludes landfills and mature sites in LTM stage (reviewed at 5-YR)

Any project where the RC duration is more than 20 years. Many of these projects have been shown to not have proper evaluation for close out or exit strategies

- **Total CTC ≥ \$5M**

- Large commitments of capital
- Large (>\$50k) commitment in RAO/O&M over >15 yrs
- Low concentration of COCs with low commitment of RAO/O&M

Any project that will cost more than \$5M to close out (Phase 1-7). Some projects may be artificially inflated by using outdated standards, non-innovative techniques or need for more studies/date to reduce unknowns

– **IRP Documents meeting Tier 1 or 2 Criteria require a QDR, unless specifically exempted by the FEC ER Manager *in collaboration with the* LANT/PAC ER Manager**

– **All other RAA/FS documents should follow the normal Optimization review process**

Key Components of the QDR Process



- **FEC ER Managers are responsible to identify documents that require consideration for QDR (input from RPMs)**
 - **FEC inventory list due to LANT and PAC ER Managers by 1 Dec**
- **Process relies upon annual inventory of documents by the ER Managers at Echelons III and IV (with updates as needed)**
 - **LANT and PAC ER Managers are responsible to ensure timely review and appropriate logging/tracking**
 - **ER Managers appoint QDR Coordinators who maintain document inventory/status and facilitate assigned SME review and communication with RPM/project team**

Key Components of the QDR Process (NIRIS)



- How is QDR initiated?
 - NIRIS
 - Tools (the wrench)
 - Go to “Document Review”
 - Select “New QDR”

The screenshot shows the NIRIS web application interface. At the top left, there is a navigation menu with icons for home, user profile, tools (wrench), documents, settings, and help. The main content area is titled "NIRIS Tools" and lists several categories of tools: "RPM Tools", "NIRIS Tools", "Restoration Records", "Land Use Control", "Data Analysis and Download Tools", "NIRIS GRX Viewer", "Document Review", and "File Transfer". Each category has a brief description and a set of buttons for accessing specific tools. A white arrow points from the wrench icon in the navigation menu to the "NIRIS Tools" category in the main content area. Another white arrow points from the "New QDR" button in the "Document Review" section to a callout box.

1 – Click on NIRIS Tools

2 – Under Document Review, Select “New QDR”

Key Components of the QDR Process (NIRIS)



DOCUMENT REVIEW

HOME

NEW DOCUMENT

PLANNED

MY DOCUMENTS

MY REVIEWS

New QDR Document Review

Region: (required)
Select a Region

Document Type: (required)
Select a Document Type

Installation: (required)
Select an Installation

Contract: (required)
Enter a Contract

Navy RPM: (required)
Select an RPM

CTO: (required)
Enter a CTO

Contractor POC: (required)
Select a Contractor

Funding Types: (required)
 BRAC ERN REIMB

Description: (required) 500
Enter a description

Expedited Review?: (optional) ?
 Yes No

Expedited Date: (optional)
MM/DD/YYYY

Site(s): (required)
Select an Installation

Media: (required)
Air
Groundwater
Other
Sediment

Phase: (optional)
Close Out
Design/Construction
Investigation
Long Term Monitoring

Contaminant: (required)
DNAPL
Emerging Contaminant
Herbicides
Inorganics (non-metals)

Attach Documents Share This Review Cancel Submit

- Populate the appropriate fields for New QDR
 - Attach Supporting Documents
 - Submit

• Review request can be initiated by RPM or contractor

Key Components of the QDR Process (NIRIS)



• NIRIS Document #

• SME Comments Posted

• Update Review Document/ Add Document (RTCs)
• Posted by RPM or contractor

• Posted Review Documents
• QDR documents are retrieved for SME review

Key Components of the QDR Process (cont'd)



- **RPM or Contractor will upload internal draft documents into NIRIS**
- **Notification from NIRIS to QDR Coordinators at LANT/PAC/EXWC**
- **QDR coordinators notify the assigned SME reviewers from ER Manager QDR Tracking Table/Document List**
- **Each QDR review is reviewed by 2 SMEs (Primary and Secondary)**
- **RPM will ensure sufficient review time**
 - SMEs have 14 business days to review
 - RPM/Contractor has 30 days to review comments
 - Comments are adjudicated; incorporated, or dismissed in collaboration with SMEs & RPMs
 - Navy Policy, CERCLA requirements, and optimization opportunities are focus

Key Components of the QDR Process (cont'd)



- **SME comments are assigned a “type”**
 - C: Critical (contentious issue; will cause SME non-concurrence)
 - M: Major (incorrect material; may cause SME non-concurrence)
 - S: Substantive (factually incorrect material)
 - A: Administrative (grammar, punctuation, style, etc.)
- **SME comments are listed by reviewer and noted by page/section**
 - Rationale for comment may be added (e.g, Navy guidance/policy, USEPA, DOD policy, etc.)
- **Directions on how to prepare comment responses are on Page 1 of the comment matrix provided with QDR review comments**
- **RPM/project team responds to comments as “decision” in the comment matrix**
 - A: Accept
 - R: Reject (rationale required for rejection)
 - M: Accept with modification (rationale required for modification)

Key Components of the QDR Process (cont'd)



- Response to comments is required; SMEs review and accept responses to complete the QDR process
- If the RPM and SMEs cannot satisfactorily resolve comments, the RPM should raise the issue to their ER Manager to provide justification to the LANT or PAC ER Manager
 - Follow up required for comment resolution to reach agreeable outcome

How does the process ensure consistency across the SME reviewers?

Example: Protectiveness Statements regarding PFAS in 5-Year Reviews

Issue: Inconsistency noted in the way PFAS was being addressed in 5-YRs led to SMEs collaborating to ensure consistency in PFAS sites.

Outcome: QDR process led to SME consultation with ER Managers/HQ and the development of slides with SME direction on how PFAS protectiveness should be addressed in 5-YRs as an aid to ensure consistency across the Navy's IR sites in 5-YRs.

Example: Five Year Review Common Findings



ITEM	SOURCE	TYPE	PAGE	SECTION	REVIEWER'S COMMENT & REVISION	RATIONALE	DECISION (A/R/M)
1	DC	S	iii	Executive Summary	The FYR should be written as the Navy is the author. The recommendations in the Executive Summary Table are currently written as a contractor making a recommendation to the Navy, NOT the Navy acknowledging notification to Regulatory Agency of their intent to implement the recommendations to address issues.	Clarification	
2	DC	M	ix	Executive Summary	<p>Before evidence of trespassing can be an issue that affects protectiveness, the Navy must demonstrate that RME to surface soil concentrations would pose unacceptable risk to a trespasser. If this risk analysis has been done, it should be clarified in the FYR. If this risk analysis has never been conducted, it should be conducted and accounted for in making the protectiveness determination.</p> <p>The idea that signs or fencing need to be repaired or installed also should not affect protectiveness as the remedy is the LUC and the inspections that identified these needed repairs. These issues can be addressed in "Other Findings" as issues not affecting protectiveness but identified during inspections and identify milestone target dates for the repairs (preferably before submittal of this FYR if it is simply getting a sign up). This site should be considered Protective, not Short-Term Protective if chains and signs are the issue</p>	Clarification	
3	DC	M	5-2	5.5	<i>"These observations could be an early indicator of potential remedy failure"</i> re-consider this interpretation and consider deleting this because the LUC inspections are working and Navy intends to address issues identified during inspections to ensure protectiveness is maintained.	CERCLA FYR Process	
4	DC	M	5-3	5.6	The intent of CERCLA in conducting interviews as part of the FYR process is to engage the community. Interviews should be conducted BY the NAVY/EPA/State (in many cases the lead regulatory agency should be leading the interviews) and the interviewees should be community people interested in the site and any folk that have a reason to access the site (e.g. grounds keeper or building occupant). It is not intended for Navy/EPA/State to interview each other.	CERCLA FYR Process	

Key Components of the QDR Process (cont'd)



- **Communication is very helpful in the QDR Process!**
 - SMEs may contact RPMs to ensure availability around anticipated time of QDR being posted in NIRIS for review
 - Thus far, the SMEs have mostly met the 14 day TAT for review
 - If issue with SMEs on meeting 14 day TAT, notice will be provided and an alternate reviewer may be assigned or a review extension may be requested
 - Scheduling a brief teleconference between SMEs and the RPM/supporting contractor at the onset of the review
 - Helpful for complex documents or where supporting background information would help provide context for review
 - Review constraints in time due to contracting issues (e.g., legacy fixed-price CTO)
 - Regulatory or trustee considerations that have impacted the project's current status
 - Consider scheduling a teleconference to resolve comments/responses

Knowledge Check



- Does a RAA need to be considered for QDR? Yes or No?
- The QDR process applies to documents for IRP sites that _____, _____, or _____ a remedy.
- Preparation of response to comments from SME is optional for QDR?
True or False?

Knowledge Check



- Does a RAA need to be considered for QDR? Yes or **No**?

The RAA is the first step in remedy evaluation documents; the RAA only looks at proposed alternatives as in initial optimization step; the follow-on FS, EE/CA, CMS, etc. will be subject to the QDR.

- The QDR process applies to documents for IRP sites that evaluate, modify, or select a remedy.

- Preparation of response to comments from SME is optional for QDR?
True or **False**?

False. RPMs (with supporting contractor assistance) are to provide a response to SME comments with 30 business days.

Questions?

Points of Contact – QDR Coordinators

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Questions



Wrap Up



- Please complete the feedback questionnaire at the end of this webinar.
We are counting on your feedback to make this webinar series relevant!

- **Next OER2 Webinar Info....**

Title: Introducing the Navy new ERB Website

Presenter: Tara Meyers and Gunarti Coghlan

Date: TBD in Mid-May

Time:

- Thank you for participating!