DEPARTMENT OF THE NAVY

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From: Commander, Naval Facilities Engineering Command (NAVFAC)

Subject: NAVFAC ENVIRONMENTAL RESTORATION, NAVY (ER,N) PROGRAM
DIRECTIVE FOR QUALITY DOCUMENT REVIEW (QDR) OF DEPARTMENT
OF THE NAVY (DON) INSTALLATION RESTORATION PROGRAM
(IRP)SITES

Ref: (a) Department of Defense (DoD) Manual: Defense
Environmental Restoration Program (DERP) Management,
September 2012

         (b) DON Environmental Restoration Program (NERP) Manual,
February 2018

         (c) DON Policy for Optimizing Performance and
Sustainability of Remedial and Removal Actions at All DON
Active Environmental Restoration Program Sites, April 2012

         (d) DON Guidance for Preparing a Remedial Alternatives
Analysis (RAA) Document, April 2012

Encl: (1) NAVFAC ER,N Program Directive for the
Quality Document Review (QDR) Process for DON IRP Sites

1. As directed in references (a), (b), (c), and (d) sustained
optimization is an important element of our site remediation approach
to ensure efficiency and effectiveness. As the IRP matures, it is
increasingly important to leverage the technical resources available
across NAVFAC to help achieve greater efficiencies and/or
effectiveness throughout the site remediation lifecycle. This
directive requires implementation of the QDR process to utilize these
resources to better support continued optimization throughout the
remediation lifecycle for IRP sites (Enclosure (1)).

2. This NAVFAC directive applies to all cleanup efforts conducted at
DON Active ERP Sites and is to be implemented immediately.

3. The Headquarters points of contact for this directive are Kim Brown
(kim.brown@navy.mil) and Gunarti Coghlan (gunarti.coghlan@navy.mil).

Subj: NAVFAC ENVIRONMENTAL RESTORATION, NAVY (ER,N) PROGRAM
DIRECTIVE FOR QUALITY DOCUMENT REVIEW (QDR) OF DEPARTMENT OF
THE NAVY (DON) INSTALLATION RESTORATION PROGRAM (IRP) SITES

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NAVFAC ER,N PROGRAM DIRECTIVE FOR
THE QUALITY DOCUMENT REVIEW (QDR) PROCESS FOR IRP SITES

OVERVIEW:

A defined document review process is critical to ensure programmatic consistency, high quality, and technical validity of CERCLA documents within the ER,N Program. *This review process requirement applies to CERCLA, RCRA, or State equivalent documents that directly or indirectly evaluate, select, or modify a remedy or path forward at DON IRP sites.* These documents include, but are not limited to the following: Feasibility Study, Proposed Plan, Record of Decision, Time-Critical Removal Action Memorandum, Engineering Evaluation/Cost Analysis, and Five-Year Review Report. The QDR process *emphasizes collaborative efforts and provides feedback mechanisms among the Remedial Project Managers (RPMs), Contractors, Subject Matter Experts (SMEs), First-level Supervisors, and ER Managers.* The SMEs are internal NAVFAC Environmental Restoration community members from all echelons with specific expertise in one or many aspects of environmental restoration. FEC ER Managers are responsible to identify cleanup documents that require consideration for the QDR process. The QDR process relies on an annual inventory of CERCLA documents by the ER Managers at Echelons III and IV, with updates throughout the year as needed when new documents are identified and other documents are delayed or cancelled as part of the remediation process. The NAVFAC Atlantic (LANT) and NAVFAC Pacific (PAC) ER Managers are responsible to ensure cleanup documents are reviewed in a timely manner and appropriately logged.

Trigger criteria have been developed to determine which documents require consideration for QDR as shown below in Tables 1 and 2. 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. Tier 1 criteria are more critical and it is anticipated that nearly all documents meeting Tier 1 criteria will require a QDR.

The QDR process will use the Document Review Module in NIRIS for maintaining and tracking the inventory and status of QDR documents. Table 3 shows an example of the documents inventory and tracking sheet. The LANT and PAC will appoint QDR Coordinators who will be responsible in maintaining the currency of the QDR documents inventory and status and coordinating the SMEs' assignment and communication between SMEs and RPMs/Supervisors/ER Managers. LANT and PAC may provide detailed instructions on submitting QDR requests in NIRIS.

Tier 1 Criteria	Sub-Criteria	Intent
Precedence Setting	Site Reopener	Any project or approach that has not been done by the Navy before and will create precedence if approved. New P&T treatments systems are included because these systems are being phased out with exception of the special cases where no other technology is proven to be more effective.
	Off-Base Treatment	
	New/Emerging Technology	
	New/Expansion of Pump and Treat (P&T)	
	Implementation of Standard Uncommonly Used for Cleanup Goal	
	Implementation of Low/Potentially Unachievable Cleanup Goal	
	Red Flags in Remedial Action Objective (RAO) Language	
Emerging Issues	Emerging Contaminants	Any project that may have emerging issues that may not have specified criteria associated to clean up. RPMs should not have to guess the correct path forward, since there is no agreed upon path at this time.
	Perfluoroalkyl substances (PFAS)	
	Vapor Intrusion	
	Chemicals with no Clear Risk Information	
Public/Regulatory/Political Interest		Any project that could create public, political or regulatory negative attention that could potentially become a future liability.

Table 1 – Tier 1 Trigger Criteria

Tier 2 Criteria	Sub-Criteria	Intent
Large quantities/complex soil and sediment excavation		Any project that requires large quantities of soil/sediment to be removed. This will be for restoration and not for MILCON purposes. Toxicity, risk levels, clean up goals can be evaluated. Any quantities over 1500 cubic yard of material will trigger evaluations.
RC duration is more than 20 years (does not include mature landfill sites in the LTM stage)		Any project where the Response Complete duration is more than 20 years. Many of these projects have been shown to not have proper evaluation for close out or exit strategy. Landfills and mature sites that are in the long-term monitoring/management (LTM) phase and have a perpetuity flag are not included into this category since they can be reviewed during the 5-year review process.
Total CTC > or equal to $5M	Large commitment in capital cost	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/data to reduce unknowns.
	Large (>$50K) commitment in Remedial Action Operation (RAO)/Operation & Maintenance costs over long timeframe (>15 years)	
	Low concentration contaminants with low commitment of RAO/LTM cost (e.g., <$10K) over long period of time (>20 years)	

Table 2 – Tier 2 Trigger Criteria

QDR KEY COMPONENTS:

The key components of the QDR process are:

Sites List and Reporting Cycle:

- Initial List: FEC, LANT, and PAC ER Managers will identify cleanup documents that are scheduled to be produced during the upcoming FY that meet any of the trigger criteria (Tables 1 and 2) for QDR consideration. ER Managers at Echelon IV are to work with their staffs to develop and submit the initial list of documents requiring a QDR to the LANT/PAC ER Manager by 1 DEC each year. All documents that evaluate, select, or modify a remedy and meet trigger criteria shall be included on the initial list. A document can be added in the initial list as determined by LANT/PAC ER Manager and Echelon IV ER Manager. RPMs/Supervisors are responsible to inform their ER Manager of such cases.
- Progress Update: By 31 OCT each year, LANT and PAC will provide a report to HQ that summarizes the programmatic results of the QDR efforts within their AOR and provides process improvements that could be considered (as needed).
- Final AOR-Wide List: LANT and PAC ER Managers will submit an AOR-wide list to HQ by 31 JAN.

SMEs Assignment:

- The LANT, PAC, and NAVFAC Engineering and Expeditionary Warfare Center (EXWC) ER Managers will collaboratively assign one or more SMEs for each document that requires a QDR.
- SME(s) will be assigned within 2 calendar days or in a timely manner

Document Submittal and Review:

- Based on the final QDR document list, RPMs will load QDR request of a document into NIRIS.
- RPMs are to take into account the additional review time and effort into the site's overall schedule and budget. It should be noted that the QDR process is part of the routine best practices in project management.
- LANT and PAC QDR Coordinators will facilitate the reviews between the RPMs and assigned SME(s), and ensure SME comments and RPM responses are appropriately tracked and logged.
- RPMs will load documents for QDR at the internal Navy draft phase into NIRIS. (Generally, this is the best document version to submit for QDR, as the SME(s) review can be structured to be concurrent with the RPM review. RPMs are encouraged to include the SME comments in their feedback to the contractor that prepared the document). LANT and PAC QDR Coordinators will assist with the document loading/logging/tracking process in NIRIS as needed.
- RPMs are responsible to ensure documents are appropriately provided for review (LANT and PAC QDR Coordinators will facilitate).

- LANT, PAC, and EXWC are responsible to ensure SMEs can conduct document reviews in a timely manner (14 business days). If an assigned SME cannot conduct a review within a required timeframe, the LANT/PAC/EXWC ER Manager will assign a replacement SME for that review.
- SME(s) will have 14 business days to conduct the review and submit comments for each document assigned, unless otherwise specified based on an agreeable schedule discussed with the RPMs. A lead SME will be selected for document reviews with more than one assigned SME. For those documents the lead SME is responsible to collaborate with other assigned SMEs and provide one consolidated set of SME comments to the RPM. SMEs will provide copies of comments to LANT/PAC QDR coordinators.
- RPMs will provide a response to SME comments within 30 business days (with copies to the LANT/PAC QDR coordinators). If the response to comments is considered satisfactory by the assigned SMEs, the process is complete for that document. If not, further collaboration may be needed among the RPM(s) and SME(s) to resolve concerns before proceeding with further document development. If, after further collaboration, the RPM(s) and SME(s) cannot satisfactorily resolve comments, the RPM can raise the issues to their ER Manager (it is not anticipated this will occur often). The ER Manager can provide justification to the LANT/PAC ER Manager about why the SME comment(s) should not require resolution for that particular situation, and direct their RPM to continue with the associated document/cleanup efforts. The LANT/PAC QDR Coordinator will enter the ER Manager's SME-override input into NIRIS for that document.
- Aside from this QDR process, HQ may initiate an ad-hoc review of any site, or portfolio of sites, based on the CTCs, RC projection dates, relative risks, or other programmatic considerations.

IRP Documents Inventory and Status

FY: Inventory Date: Maintained by:

A	B	C	D	E	F	G	H	I	J	K	L	M	N
FEC	FFID	Installation	Site	RPM	Reviewer(s)	Description	Type of Document	Doc. Version	Tier 1 Trigger Met?	Tier 2 Trigger Met?	Trigger Criteria Evaluation Note	Recommended for SME Review?	Why or Why Not?
ML							TCRA AA	Draft					

Dropdown

J,K See the evaluation trigger criteria sheet in this spreadsheet

Table 3 - QDR Inventory and Status Tracking