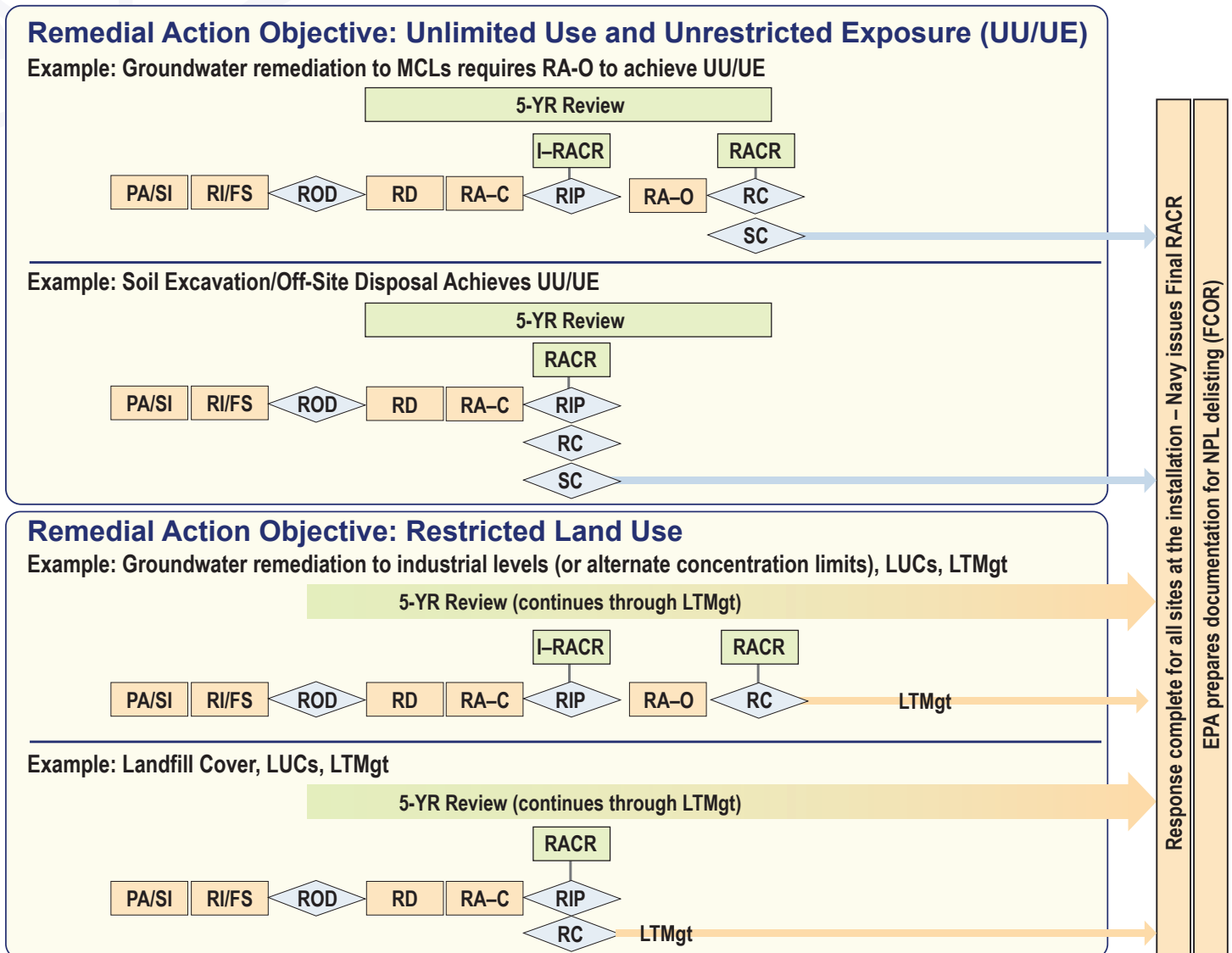


This fact sheet clarifies documenting remedial action completion activities supporting National Priorities List (NPL) delisting under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Although EPA's May 2011 guidance *Closeout Procedures for National Priorities List Sites* eliminates the distinction between Interim Remedial Action Completion Reports (I-RACRs) and RACRs, RPMs should follow Department of the Navy Guidance on *Documenting Milestones throughout the Site Closeout Process 2006* and DoD/EPA Joint Guidance on *Streamlined Site Closeout and NPL Deletion Process for DoD Facilities 2005*. Consistent with Navy and DoD/EPA Joint Guidance, RPMs should prepare an I-RACR for each site that will have a prolonged Remedial Action Operation (RA-O) phase, to document the remedy is constructed and is operational and functional. Consistent with Navy guidance, the RPM maintains flexibility for reporting the Remedy-in-Place (RIP) milestone; hence the I-RACR can be completed after the RPM reports completion of RIP milestone. When Remedial Action Objectives (RAOs) have been achieved for a site, Response Complete (RC) is documented in a RACR. When the last remaining CERCLA site on an installation achieves RC, a final RACR is prepared; this final RACR also summarizes all previous RACRs completed for the installation. This final RACR is the primary document supporting NPL delisting. The EPA will use the final RACR to prepare the Final Closeout Report (FCOR) for NPL delisting.

The graphic below illustrates Navy milestones and the incorporation of I-RACRs and RACRs in the CERCLA process. The first set of flowcharts illustrates sites with RAOs for unlimited use and unrestricted exposure and the second set of flowcharts illustrates sites with RAOs for restricted land use. The RPM should refer to the 2006 Navy Guidance for sites with multiple RODs or operable units. References and acronyms and definitions of Navy milestones are provided on page 2.

CERCLA Process Flowchart



References

DoD/EPA Joint Guidance *Streamlined Site Closeout and NPL Deletion Process for DoD Facilities* (2005)

http://www.denix.osd.mil/references/upload/RACR_Guidance.pdf

Department of the Navy Guidance *Documenting Milestones throughout the Site Closeout Process* (2006)

https://portal.navy.mil/portal/page/portal/navfac/navfac_ww_pp/navfac_nfesc_pp/environmental/erb/resourceerb/ug-2072-env.pdf

EPA Guidance *Close Out Procedures for National Priorities List Sites* (2011)

http://www.epa.gov/superfund/programs/npl_hrs/closeout/index.htm

Acronyms and Definitions

Preliminary Assessment/Site Inspection (PA/SI)	Identifies contaminated sites based primarily on the review of the existing information about hazardous substance disposal releases at an installation.
Remedial Investigation/ Feasibility Study (RI/FS)	Includes a sampling and analysis program that is adequate to determine the nature and extent of contamination, human health and ecological risk assessments, initial screening of remediation alternatives, and detailed evaluation of remediation alternatives.
Removal Action	The removal action process is used to address the release of hazardous substances, which may present a threat to human health and the environment. Removal actions can be taken during any phase of the cleanup process; but are more common during the PA/SI or RI/FS phases.
Proposed Plan (PP)/ Record of Decision (ROD)	The PP documents the preferred alternative for public review and comment. The selected remedial alternative is then documented in a ROD. The ROD includes a summary of site conditions, selected remedy, cleanup goals, and the rationale for selecting the remedy.
Remedial Design (RD)	Involves preparing the detailed design of the remedial action selected in the ROD.
Remedial Action Construction (RA-C)	The designed remedial system is constructed on the site during this phase. This phase may also include any construction related to implementation of land use controls (LUCs).
Remedy In Place (RIP)	This milestone is achieved when the construction of a remedy is complete and the remedy is operating as planned to meet remedial action objectives (RAOs). Determination of achieving the RIP milestone is a Navy decision and regulatory concurrence for this milestone is not needed.
Remedial Action Operation (RA-O)	Involves operation, maintenance, and monitoring actions for the remediation system. The RA-O phase may also include implementation, and management/maintenance of LUCs, if these were part of the selected remedial action in the ROD. The RA-O phase continues until a remediation system achieves cleanup goals. For sites with monitored natural attenuation (MNA) or other passive remedies, the RA-O phase includes long term monitoring (LTM) until the cleanup goals are met for the site.
Response Complete (RC)	This milestone signifies that the remedial action objectives have been met and the RA-O phase has achieved cleanup goals specified in the ROD. Formal documentation for the RC milestone is essential to ensure recognition of completion of cleanup goals at the site. Regulatory concurrence on the response completion milestone is required.
Long-Term Management (LTMgt)	Following the RC milestone, this phase may be required to monitor long-term protectiveness of the remedy when the cleanup goals do not allow unrestricted use and unlimited exposure. Actions during this phase may involve groundwater monitoring, implementation and management of LUCs, and conducting 5-year reviews. Operation of an active or passive remedy is not included in the LTMgt phase. All such operations should be complete prior to meeting the RC milestone and start of the LTMgt phase.
Site Closeout (SC)	This milestone signifies that the Navy has completed active management and monitoring at a site, the remedy is protective of human health and the environment, no restrictions on future land use are needed for this site, and no additional funds are expected to be expended at the site. As such, SC is an important milestone; but, unlike RIP or RC, it is not a DoD metric for measuring progress under the Environmental Restoration Program.