

# Glenn Research Center, Environmental Program Manual

## Chapter 25 – CERCLA ENVIRONMENTAL REMEDIAL ACTIVITIES

**NOTE:** The current version of this Chapter is maintained and approved by the Environmental Management Office (EMO). The last revision date for this chapter was October 2004. If you are referencing paper copies, please verify that it is the most current version before use. The current version is maintained on the Glenn Research Center intranet at <http://smad-ext.grc.nasa.gov/emo/pub/epm/epm-contents.pdf>. Approved by: EMO Chief, Michael Blotzer {[mailto: Michael.J.Blotzer@nasa.gov](mailto:Michael.J.Blotzer@nasa.gov)}.

### PURPOSE

This chapter establishes policy, procedures and responsibilities for the investigation and remediation of uncontrolled releases of CERCLA hazardous substances into the environment from past operations at GRC. It conforms to the GRC EMS as defined in this Manual EMS [Chapter 1](#); and supports GRC environmental policy, which promotes pollution prevention, regulatory compliance, and continuous improvement. GRC employees and contractors at all levels who in any way participate in the development and execution of GRC action involving the handling, excavation, storage, transportation, and/or disposal of soils must follow the established policies, procedures, and guidelines outlined in this manual Chapter 34 – Handling, Reuse, and Disposal of Soil. Following the guidelines in this chapter will help achieve the GRC regulatory compliance objectives and targets. Achievement of these objectives and targets can be tracked through the audit results and Corrective and Preventive Action Report (CPAR) records.

### APPLICABILITY

This chapter applies to all civil servant employees and on-site support service contractors within GRC EMO who have responsibility for implementation of CERCLA activities. It also applies to all civil servant employees and on-site support service contractors within GRC who assist EMO in implementing CERCLA activities through resource management, procurement, and funding.

### DEFINITIONS

**CERCLA:** Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (Public Law 96-510), commonly known as Superfund.

**CERCLA site/facility:** Any site where an uncontrolled release of a hazardous substance, pollutant or contaminant exists or is threatened. Any building, structure, installation, equipment, pipe, well, pit, pond, impoundment, ditch, landfill, storage container, rolling stock or any site or area where a hazardous substance has been deposited, stored, disposed of, or placed can be defined as a CERCLA site.

**Hazardous substances:** Are defined in Section 101(14) of CERCLA, as amended, U.S.C. 9601.

**Remedial activities:** All environmental activities undertaken at a CERCLA site including planning, reporting, investigation, remediation, and monitoring.

**Remediation:** Any remedial activity directly related to the cleanup or control of hazardous substances in a manner that protects human health and the environment.

## **BACKGROUND**

Contamination of the environment by hazardous substances has been recognized as having the potential to negatively impact human health and the environment on a national level. To address this issue, Congress passed the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (Public Law 96-510), commonly known as Superfund, in 1980. The primary goal of the Act is to encourage the identification and remediation of sites contaminated with hazardous substances. Many States, including the State of Ohio, have passed their own laws and regulations and established programs for ensuring conformance with these laws and regulations.

CERCLA contains other provisions that extend beyond environmental remedial activities. However, the GRC CERCLA Environmental Remedial Activities Program, and therefore this chapter, addresses only the sections of CERCLA that apply to the investigation and remediation of uncontrolled releases of hazardous substances into the environment from past operations.

## **POLICY**

It is Glenn Policy to:

Comply with State and Federal CERCLA requirements and the Ohio Environmental Protection Agency (OEPA), Director's Findings and Orders.

Identify and remediate CERCLA sites as rapidly as funds permit, in accordance with the terms and schedules noted in the Ohio EPA Director's Findings and Orders, in a manner that is protective of human health and the environment.

Establish and maintain an interactive, mutually cooperative relationship with regulatory agencies.

Establish and maintain a positive reputation with the public.

## **REQUIREMENTS**

### **A. Federal**

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 (Public Law 96-510), provides the requirements and basic framework for CERCLA remedial activities. The Superfund Amendments and Reauthorization Act (SARA) (Public Law 99-499) amended CERCLA in 1986, and added provisions, which specify that Federal departments, agencies, and instrumentalities must comply with CERCLA in the same manner and to the same extent as nongovernmental entities. This includes all guidelines, rules, regulations and criteria applicable to preliminary assessments (PA's), National Contingency Plan (NCP) evaluations, inclusion on the National Priorities List (NPL), and the conduct of remedial action [Sections 120(a)(2), (3), and (4)]. The U.S. Environmental Protection Agency (USEPA) is required to compile information about contaminated sites at Federal facilities and to enter the information into the Federal Agency Hazardous Waste Compliance Docket. NASA GRC is included on this docket.

### **B. State**

The OEPA has a Memorandum of Agreement with USEPA that specifies the roles, responsibilities and coordination of CERCLA responses in the State of Ohio. For sites that fail to be listed on the NPL (all sites scoring less than 28.5 on the Hazard Ranking Scoring System), Ohio maintains authority and oversees all remedial actions. Since NASA GRC site scores were well below 28.5, OEPA has authority and provides oversight at GRC.

### C. Agreements Between Ohio EPA and NASA GRC

NASA and OEPA signed an agreement that was documented in the OEPA Director's Findings and Orders dated September 20, 1996. This agreement provides for investigation and cleanup of CERCLA sites at NASA GRC at Lewis Field, and payment of oversight costs to the State of Ohio. The agreement includes a generic statement of work, which provides a detailed description of the required activities. All CERCLA remedial activities at NASA GRC are being conducted in accordance with this agreement.

NASA and OEPA also signed an agreement that was documented in the OEPA Director's Findings and Orders dated November 6, 1997. This agreement provides a general framework for CERCLA activities at NASA Plum Brook Station and payment of oversight costs to the State of Ohio. The agreement requires NASA to submit previous investigation reports to Ohio EPA and states that Ohio EPA will evaluate the reports, and inform NASA of additional requirements, if any are determined to be necessary.

### **RESPONSIBILITIES**

#### Environmental Management Office (EMO)

- Provides Program management and is responsible for the technical success of the program.
- Provides project management, including determination of budgetary requirements, requests for funding, tracking of schedules and expenditures, and contractor oversight.
- Provides technical evaluation and direction and is responsible for the technical success of the projects.
- Negotiates and coordinates technical plans and operational matters with regulatory agencies; and serves as the point of contact with these regulatory agencies.
- Provides evaluation and comment on Industrial Hygiene aspects of contractor Health and Safety Plans, and monitors contractor compliance with GRC occupational health requirements during on-site field operations.

#### Facility Division (FD)

- Provides contractor services such as surveying and utility clearances, as requested by the EMO; and may provide other services at the request of the EMO.
- The Construction Management Branch provides coordination of the project with NASA GRC organizations, and oversees field operations at GRC.
- The NASA Glenn Safety Office (GSO)
- Provides evaluation and comment on safety aspects of contractor Health and Safety Plans, and monitors contractor compliance with GRC safety requirements during on-site field operations.

### **PROCEDURES**

The procedures required at NASA GRC are complex and beyond the scope of this document. The State of Ohio has developed generic procedure documents. These procedure documents are referenced in the Ohio EPA Director's Findings and Orders.

They consist of the following:

- Ohio EPA Generic Statement of Work Remedial Investigation/Feasibility Study. This is included in the Findings and Orders as Attachment A.
- Model Statement of Work for the Remedial Design and Remedial Action. This is included in the Findings and Orders as Attachment B.
- Ohio EPA and U.S.EPA Guidance Documents. This is included in the Findings and Orders as Attachment C.
- Preferred Plans and Decision Documents. This is included in the Findings and Orders as Attachment D.

In addition to the above noted generic procedures, the U.S. Environmental Protection Agency and the Ohio EPA have developed numerous policies and guidance documents covering many of the critical elements of CERCLA environmental remedial activities. Attachment C of the Ohio EPA Director's Findings and Orders lists 60 State and Federal policies and guidance documents which the Ohio EPA accepts and/or prefers.

## RECORDS

- Work plans, sampling and analysis plans, health and safety plans, and quality assurance plans
- All engineering reports pertaining to work completed
- Monthly progress reports
- Original laboratory analysis and quality assurance data
- Background sampling reports referenced in CERCLA engineering plans and reports

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Safety and Mission Assurance Directorate ( [SMAD](#) )

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