



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAY 18 2016

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

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EMERGENCY MANAGEMENT

**MEMORANDUM**

**SUBJECT:** "Resource Conservation and Recovery Act Facilities Investigation Remedy Selection Track (RCRA FIRST) - A Toolbox for Corrective Action"

**FROM:** Barnes Johnson, Director  
Office of Resource Conservation and Recovery  
Office of Land and Emergency Management

A handwritten signature in black ink that reads "Barnes Johnson".

**TO:** RCRA Division Directors, EPA Regions 1-10

I am pleased to transmit the attached user manual, the "Resource Conservation and Recovery Act Facilities Investigation Remedy Selection Track (RCRA FIRST) – A Toolbox for Corrective Action." This user manual has been made possible by the leadership of our Region 3 and 7 RCRA programs, the OLEM Corrective Action Team and EPA's Office of Policy. Thanks to their efforts, this manual distills the practical lessons learned and experiences contributed by federal, state, and regulated community representatives involved with investigation and remedy selection at facilities nationwide. Through insight gained from two separate Corrective Action Lean events, follow-on training workshops, and piloting at facilities, this manual sets forth approaches to increase the efficiency and effectiveness of our cleanup work. By focusing efforts on key issues and emphasizing value-added activities, the revised methodology has been designed to reduce the planning time by as much as 50-75%, resulting in faster cleanup decisions and facilitating the redevelopment of corrective action facilities. This effort represents and unites two of the Agency's themes, "Embracing EPA as a High Performing Organization," and "Making a Visible Difference in Communities," and the E-Enterprise efforts with our state partners.

The corrective action toolbox provides how-to guidance, process flow maps, management plans and tools, and templates, to help project managers and site managers be more efficient and effective in their work. These tools have been utilized over the last year at facilities in our Region 3 and Region 7 geographical areas and at pilots in other Regions. The RCRA FIRST tools are designed to be used in a variety of situations including at facilities that are implementing corrective action pursuant to permits or orders, or voluntarily. The tools are working, and we are encouraged by the improved performance times to reach key milestones in the cleanup process. We are exceeding our initial expectations and the regulated community interest in the RCRA FIRST process is positive.

To help facilitate the rollout of the RCRA FIRST process and toolbox, we have conducted training events for our Regional and state project managers, as well as our industrial stakeholders. For FY16, we have held three 1-day training events in EPA Regions 4, 9, and 10. We have also developed a 3-day workshop that incorporates the RCRA FIRST toolbox training and utilizes process improvement tools to take a closer look within a state or Region. We have conducted the 3-day events in Ohio and Washington.

If there are any questions or if a Region or state is interested in participating in training events and/or hosting an event, please contact Sara Rasmussen of my staff at 703-308-8399 or [rasmussen.sara@epa.gov](mailto:rasmussen.sara@epa.gov).

The toolbox and additional RCRA FIRST resources will shortly be posted at:  
<https://www.epa.gov/hw/toolbox-corrective-action-resource-conservation-and-recovery-act-facilities-investigation-remedy>.

I encourage all involved in cleanup activities at our corrective action facilities to embrace these enhanced approaches and tools, apply performance measurement to gauge your process improvement process, and share lessons learned as you implement the RCRA FIRST framework.

Attachment

cc: Dania Rodriguez, Executive Director, ASTSWMO  
Kerry Callahan, Senior Program Manager, ASTSWMO