

## RCRA FIRST TOOL 10: Control Plan

The following table outlines a Control Plan to track process improvements with RCRA FIRST. The control plan outlines the metric for each step in the facility investigation and remedy selection processes, the unit of measure for tracking, and the target measure of performance. Project managers can track progress in the “Current Quarter Status” column and take the suggested recovery actions where necessary.

### RCRA FIRST CONTROL PLAN

**Process:**  
RCRA Facility Investigation and  
Remedy Selection Processes

**Prepared by:**  
**Approved by:**  
**Owner:**  
**Revision #:**

**Prepared Date:**  
**Approved Date:**  
**Revision Date:**

**Table A.4 RCRA Facility Investigation Control Points**

Control Point ID	Metric	Unit of Measure	Target Measure of Performance	Current Quarter Status	Recovery Action
1	% of Facilities with signed CAF at CAF meeting adjournment	% of Facilities	20%		ID what part of CAF meeting is ineffective and repair
2	% of Facilities with signed CAF within 3 weeks of meeting adjournment	% of Facilities	25%		ID what part of CAF meeting is ineffective and repair
2a.	% of Facilities where initial CAF disagreement results in 1 <sup>st</sup> level escalation	% of Disagreements	5%		ID what part of CAF meeting is ineffective and repair
3	% of total RFI Workplans that achieve approval on first submission	% of Workplans	75%		ID which areas of the RFI Workplan required rework and repair process
3a.	% RFI Workplans requiring elevation to be approved	% of Workplans	5%		ID the areas of common disagreement and repair process
4	% approved RFI Workplan submitted in accordance to schedule established in CAF	% of RFI Workplans	95%		ID root cause(s) of why schedules are not adhered to and repair process
5	Field data approved/deemed adequate during “Field Review Meeting”	# of Approval Decisions			ID root cause(s) of why approval decisions cannot be made and repair process

Control Point ID	Metric	Unit of Measure	Target Measure of Performance	Current Quarter Status	Recovery Action
5a.	Field data approved/deemed adequate through elevation	# of approval decisions			ID root cause(s) of why approval decisions cannot be made and repair process
6	% total RFI Reports that achieve approval on first time submission	# RFI Reports; % of total RFI Reports	75%		ID most common reason(s) RFI Report is not approved and repair process
6a.	% of total RFI Reports approved requiring elevation	# RFI Reports; % of total RFI Reports	5%		ID most common reason(s) RFI Report is not approved and repair process
7	# of RFI Reports submitted in accordance to initial schedule	# RFI Reports	95%		ID root cause(s) of why schedules are not adhered to and repair process
8	% RFI Report approvals that include site conceptual model	% of time agreement reached with no revisions			ID root cause(s) of why approval decisions cannot be made and repair process
9	% of Facilities that # of days between RFI imposed until CAF agreement (CAF102-CA100) was less than or equal to 180 days	% of Facilities	180 days		ID root cause(s) of why schedules are not adhered to and repair process
10	% of Facilities that # of days between CAF agreement until RFI Workplan approval (CA150-CAF102) was less than or equal to 90 days	% of Facilities	90 days or less		ID root cause(s) of why schedules are not adhered to and repair process
11	% of Facilities that # of days between RFI Workplan approval until RFI Report Submitted (CA190-CA150) was less than or equal to 1440 days	% of Facilities	1440 days or less		ID root cause(s) of why schedules are not adhered to and repair process

Control Point ID	Metric	Unit of Measure	Target Measure of Performance	Current Quarter Status	Recovery Action
12	% of Facilities that # of days between RFI Report submitted until RFI Report approval (CA200-CA190) was less than or equal to 120 days	% of Facilities	120 days or less		ID root cause(s) of why schedules are not adhered to and repair process
13	% of Facilities that # of days between RFI Imposed until RFI Report approval (CA200-CA100) was less than or equal to 1830 days	% of Facilities	1830 days or less		ID root cause(s) of why schedules are not adhered to and repair process

**Table A.5 Remedy Selection Process Control Points**

Control Point ID	Metric	Unit of Measure	Target Measure of Performance	Current Quarter Status	Recovery Action
14	# of total facilities with RSP finalized				
15.a	% of total facilities with RSPs not requiring a CMS	% of each type of facility			
15.b	% of total facilities with RSPs requiring a limited CMS				
15.c	% of total facilities with RSPs requiring a full CMS				
16	% of facilities that # of days between <i>RFI Report approval</i> until <i>RSP Finalized (CAF203 - CA200)</i> was less than or equal to 10 mo./300 days	% of Facilities	10 mo./300 days		ID root cause(s) of why schedules are not adhered to and repair process
17	% of facilities that require joint elevation at time of the Remedy Selection Framework meeting	% of facilities			
18	% of total # of facilities that require joint elevation at time of CMS Workplan approval	% of facilities			

Control Point ID	Metric	Unit of Measure	Target Measure of Performance	Current Quarter Status	Recovery Action
19	% of total # of facilities that require joint elevation at time of <i>CMS approval</i>	% of facilities			
20	% of facilities that # of days between RSP Finalized (CMS Agreed Upon) to Issues Proposed Remedy for Facilities without CMS (CA350 - CAF203) was less than or equal to 60 days	% of facilities	60 days		ID root cause(s) of why schedules are not adhered to and repair process
21	% of facilities that # of days between RSP Finalized (CMS Agreed Upon to CMS Approval) for Facilities with limited CMS (CA350-CAF203) was less than or equal to 390 days	% of facilities	390 days		ID root cause(s) of why schedules are not adhered to and repair process
22	% of Facilities that # of days between RSP Finalized (CMS Agreed Upon to CMS Approval) for Facilities with Full CMS was less than or equal to 510 days	% of facilities	510 days		ID root cause(s) of why schedules are not adhered to and repair process
23	% of facilities that # of days between CMS Approval to Final Remedy Selection (CA400-CA350) was less than or equal to 180 days	% of facilities	180 days maximum		ID root cause(s) of why schedules are not adhered to and repair process
24	% of facilities that # of days between RFI Report Approval to Final Remedy Selection for Facilities without CMS (CA400-CA200) was less than or equal to 12 mo./365 days	% of facilities	12 mo./365 days		ID root cause(s) of why schedules are not adhered to and repair process

Control Point ID	Metric	Unit of Measure	Target Measure of Performance	Current Quarter Status	Recovery Action
25	% of facilities that # of days between RFI Report Approval to Final Remedy Selection for Facilities with limited CMS (CA400-CA200) was less or equal to 18 mo./547 days	% of facilities	18 mo./547 days		ID root cause(s) of why schedules are not adhered to and repair process
26	% of facilities that # of days between RFI Report Approval to Final Remedy Selection for facilities with Full CMS (CA400-CA200) was less or equal to 24 mo./730 days	% of facilities	24 mo./730 days		ID root cause(s) of why schedules are not adhered to and repair process

### Business Rules

1. When comprehensive agreement cannot be reached, then the issues are elevated to the next level of management
2. Development of RFI Workplan cannot ensue until full consensus is achieved by all parties
3. All sites doing RFI (new) will proceed to RSP
4. Sites needing CMS will go through RSP
5. PM will submit 1-page case study to EPA HQ ORCR within 30 days of RFI approval
6. Consider # and capability of resources when establishing RFI target goals, which must be between 1 and 4 years
7. A site will go through the new Remedy Selection Process in the following situations:
  - If the site has completed the new RFI process
  - If the site has not started or is already in the old CMS process but no CMS Workplan has been developed