

WHEN IS AN RI NOT AN RI? – PLANNING FOR “DESKTOP” REMEDIAL INVESTIGATIONS

James A. H. Salisbury, U.S. Army Corps of Engineers, Austin, TX

A remedial investigation (RI) is a process focusing on defining the nature and extent of contamination and assessing the risk to human health and the environment that might result from exposure to that contamination. Generally, the RI involves planning for data collection, conducting field activities to collect data, and performing data analysis and a baseline risk assessment. However, sometimes adequate data may have already been gathered before the RI takes place. In these cases, additional field investigation may not be necessary to collect the data necessary to characterize the nature and extent of contamination and complete the baseline risk assessment. These types of investigations are commonly referred to as “desktop” RIs.

Unfortunately, this term implies “desktop” RIs follow a shortened process where an RI report can simply be used to summarize the data from, and present the conclusions of, previous reports. Also, because fieldwork is not involved, many people think that the “desktop” RI does not require a quality assurance project plan (QAPP). However, this is not the case – because “desktop” RIs involve data analysis, they still require the project team to agree on project goals, develop data quality objectives (DQOs) and performance standards, collate and evaluate data, acknowledge and document data gaps, and conduct data usability assessment (DUA) before they can make characterization conclusions and conduct a baseline risk assessment. That is, the “desktop” RI *still* requires following the systematic planning process (SPP) and the preparation of a QAPP. There is really no such thing as a “desktop” RI – it is still an RI.

While many of the worksheets in the Munitions Response QAPP (MR-QAPP) toolkit are focused on the collection of field data, there are also worksheets that describe the SPP, preliminary conceptual site model (CSM), DQOs, secondary data, measurement performance criteria (MPCs), project approach, and DUA. To ensure the project team reaches consensus on the project goals and the standards for data, the seven-step DQO process must be followed and documented in MR-QAPP Worksheet #11 even if there is no data additional collection planned during the RI. This should also result in the development of MPCs on MR-QAPP Worksheet #12 and a description of data evaluation approach on Worksheet #17. In addition, because the conclusions of this type of RI will be based on existing data, a full discussion of these data and its limitations must be included on MR-QAPP Worksheet #13. This worksheet is typically a minor element of MR-QAPPs for sites where field data are being collected, but for RIs that do not include additional data collection, Worksheet #13 will be addressing all the data expected to support characterization conclusions for the project. For this reason, this worksheet is a critical element of the MR-QAPP. The evaluation of the existing data will also require validation and DUA, which must be described and documented on MR-QAPP Worksheets #34 through #37.

This presentation will show that there is no such thing as a “desktop” RI and demonstrate why SPP for an RI must include the preparation of an MR-QAPP to fully document the proposed data evaluation process.