

## CHAPTER 2 DEVELOPMENT OF THE RECURRING REVIEW PLAN

2-1. Introduction. A Recurring Review Plan will be developed prior to initiating Recurring Reviews on a site. This chapter discusses when the Recurring Review Plan is to be prepared; who is responsible for preparing the plan; procedures for preparing the plan; approval procedures for the plan; and how the plan may be modified.

### 2-2. Timing for Preparation of the Recurring Review Plan.

a. Current Projects. The draft Recurring Review Plan is prepared during the EE/CA or RI/FS phase, as applicable, of an OE response action. The draft plan is contained as an appendix in the EE/CA or RI/FS Report, as applicable, and will reflect the recommended response action alternatives contained in the report. The decision document will document the requirements for the Recurring Review, the review cycle, and the proposed funding for the Recurring Review.

b. Executed Projects. A Recurring Review Plan will be developed for OE projects that have already been executed and which have no Recurring Review Plan in place. The district PMs are responsible for reviewing all of their projects and determining the need for development of a Recurring Review Plan, with the District Commander providing overall approval.

### 2-3. Parties Responsible for Preparation of the Recurring Review Plan.

a. Recurring Review Plans will be developed with the full involvement of the PDT and in coordination with stakeholders, including Federal, state and local regulators. ER 1110-1-8153, OE Response, provides further details regarding organizational responsibilities throughout the OE response action process.

b. District PM. The district PM is responsible for preparation of the Recurring Review Plan. The district PM leads the PDT and is responsible for overall coordination of PDT members.

c. PDT. The PDT, under the direction of the district PM, will be fully involved in the preparation of the Recurring Review Plan. The PDT members include the district PM; other representatives from the district, as required; the OE Design Center; an OE Safety Specialist; the OE CX, as required; the HTRW MCX and/or HTRW Design Center, as required; Federal land managers; the prime contractor PM; the Native American Tribal Government point of contact, if applicable; representatives from other Federal and state agencies; and other key technical and non-technical individuals, as appropriate.

2-4. Preparation of the Recurring Review Plan.

a. A typical Recurring Review will include a review of existing documentation, identification and review of new information, a site visit, and preparation of the Recurring Review Report.

b. The Recurring Review Plan will include a site description; details regarding the frequency of the Recurring Review, the documents to be reviewed, and the methodologies to be used during the site visit; and a discussion on termination of Recurring Reviews at the site. Table 2.1 provides a sample format for the Recurring Review Plan. The plan will include any information that will be useful in conducting the Recurring Reviews.

Table 2.1  
Sample Format for the Recurring Review Plan

Section	Title
	Cover Sheet
	Table of Contents
1	Introduction
2	Site Description
3	Schedule for Recurring Review
4	Review of Existing Documentation
5	Stakeholder Notification
6	Identification/Review of New Information and Current Site Conditions
7	Preliminary Site Analysis and Work Plan
8	Site Visit
9	Recurring Review Report
10	Termination of Recurring Review

(1) Introduction. Provide a brief introduction including the site location, response actions and the objective of the Recurring Review.

(2) Site Description. Provide a site description including a description of site history, previous investigations, and a more detailed description of response actions that have been or will be implemented. Sufficient detail will be included in this section so that it provides a full

understanding of the site’s background, keeping in mind that the reader may not have any previous familiarity with the site.

(3) Schedule for Recurring Review. Discuss the frequency of Recurring Reviews for the site.

(4) Review of Existing Documentation. Identify existing documentation that will be reviewed during the Recurring Review. These will include all final reports and decision documents. The location of the reports, preferably electronic copies posted to the Internet [e.g., the Project Information Retrieval System (PIRS)], must be identified. Table 2.2 provides examples of the types of documents that normally will be reviewed.

Table 2.2  
Examples of Existing Documentation to be Listed in the Recurring Review Plan

Document Examples	
___	Statement of Work
___	Work Plans
___	Archives Search Report
___	EE/CA or RI/FS Report
___	Institutional Analysis
___	Decision Document
___	Institutional Control Plan
___	Explosives Safety Submissions
___	Site-Specific Response Report
___	Responsiveness Summaries
___	HTRW documents, if applicable
___	Real estate records
___	Newspaper records
___	Accident reports
___	Incident reports
___	Operation and Maintenance records
___	Previously conducted Recurring Review Report at the site, if applicable
___	Current DOD Risk Prioritization Results

(5) Stakeholder Notification. Identify key stakeholders, provide their contact information, and provide suggested avenues for notification based on what was successful in the EE/CA or RI/FS process.

(6) Identification/Review of New Information and Current Site Conditions. The Recurring Review Plan will include a description of the procedures that will be used to identify new information and current site conditions. The PDT will identify readily available information regarding the site that has become available since implementation of the response action or since the last Recurring Review and will identify the current site conditions.

(7) Preliminary Site Analysis and Work Plan. The PDT will prepare a preliminary site analysis based upon the review of existing and new information. This analysis will identify any additional information that is required in order to prepare the final site analysis. The PDT will prepare a work plan to identify procedures to be used in collecting the additional information identified during the preliminary site analysis.

(8) Site Visit. Describe the scope of the site visit, investigative or community relations activities that will be undertaken during the visit, and any methodologies to be utilized in connection with the visit.

(9) Recurring Review Report. The PDT will prepare a Recurring Review Report to document the information collected and evaluated, and present the findings of the evaluation of the continued protectiveness of the OE response action. The report will document whether the response action that was implemented continues to minimize explosives safety risks and is still protective of human health, safety, and the environment and/or recommend follow-up actions, as warranted.

(10) Termination of the Recurring Review. The PDT, in coordination with stakeholders and regulators, will determine the duration for continuing the Recurring Reviews at a site. The PDT will develop a strategy and rationale to clearly demonstrate when Recurring Reviews would be terminated. Further information on the termination of Recurring Reviews is discussed in paragraph 4-3 of this EP.

#### 2-5. Approval of the Recurring Review Plan.

a. The draft Recurring Review Plan is an appendix in the EE/CA or RI/FS Report, as applicable. Therefore, approval of the draft Recurring Review Plan will be in conjunction with approval of the EE/CA or RI/FS (as documented in the signed decision document) and in accordance with ER 1110-1-8153 and EP 1110-1-18.

b. The draft Recurring Review Plan will be updated, as necessary, during the design of the response action and at the completion of the response action.

c. The Recurring Review Plan will be finalized after completion of the response action.

2-6. Modification of the Recurring Review Plan.

a. The draft Recurring Review Plan may require modification during the design of the response action or at the completion of the response action and post response action phases as new information becomes available.

b. These changes will be coordinated with stakeholders and regulators through appropriate channels, depending on the phase of the project when the modification is made. For example, if it is determined during the design phase that a change to the Recurring Review Plan is necessary, the changes may be coordinated with stakeholders and regulators in conjunction with coordination of the Work Plan for the response action.

c. Modifications to the Recurring Review Plan are the responsibility of the district PM. The District Commander is the designated approval authority to approve the modified Recurring Review Plan.

2-7. Project Files. The Recurring Review Plan and any modifications will be included in the Project Files for the site.