



Printed from: Interstate Technology & Regulatory Council (ITRC). 2017. *Remediation Management of Complex Sites*. RMCS-1. Washington, D.C.: Interstate Technology & Regulatory Council, Remediation Management of Complex Sites Team. <http://rmcs-1.itrcweb.org>.

## 5.5 Completion Strategy

The long-term management plan includes a completion strategy for eventually achieving site objectives. Completion strategies are a best practice to establish sequentially devised actions based on site-specific decisions. While a straight-line concept for a completion strategy might be appropriate for typical sites, an iterative adaptive site management approach is better at complex sites. This strategy could include transition to the next phase of the remedy from more aggressive engineered remedy components to less aggressive remedy components, with separate sets of interim or site objectives and performance metrics. Completion strategies are often developed through a collaborative process, with decision documents and work plans to memorialize agreements, including interim and site objectives and performance metrics. The site closure completion strategy may also consider options to maximize future land use. ITRC offers guidance on developing completion strategies ([ITRC 2006a](#)).

Another useful reference when developing a completion strategy is the USEPA *Groundwater Remedy Completion Strategy* ([USEPA 2014b](#)). This document recommends a completion strategy for all CERCLA, Superfund, PRP and federal groundwater sites. USEPA includes the following steps for a groundwater completion strategy: understand the site conditions, design site specific remedy evaluations, develop performance metrics and collect monitoring data, conduct remedy evaluations, and make management decisions. At CERCLA sites, remedy evaluations are conducted during Five-Year Reviews, which is also a good time to review the long-term site management plan.