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CleanupNews is a monthly newsletter highlighting hazardous waste cleanup cases, policies, settlements and technologies.

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EPA Scores Victory as Vertac Decision Affirmed

EPA recently won an appellate court victory in connection with a 2005 \$119 million CERCLA cost recovery judgment against Hercules Inc. for the Vertac Chemical Plant site. Crompton Co./CIE (formerly Uniroyal Chemical Ltd.) was found jointly and severally liable with Hercules for more than \$110 million of the total judgment. The additional \$9 million assessed against Hercules was for cleanup costs associated with the nearby Jacksonville Landfill. Separately, Crompton was found responsible for only 2.6 percent of the costs vis-à-vis Hercules in a contribu-



Vertac site incineration facility, Jacksonville, Arkansas.

tion action in the same case. The 26-year-old Vertac case originated in the U.S. District Court for the Eastern District of Arkansas. The 2005 judgment of the district court was affirmed on all points on July 13, 2006 by the U.S. Eighth Circuit Court of Appeals.

In the appeal, Hercules, as former owner/operator of the site, argued that its liability for the Vertac site and the Jacksonville Landfill was divisible and should be apportioned. Hercules also ar-

gued that EPA could not recover costs related to site cleanup goals that were based on the dioxin cancer potency factor, because it was arbitrary and capricious in treating the factor as a rule (without rulemaking) in CERCLA remedy selection. Co-defendant Crompton argued that the district court erred in finding it liable as a CERCLA arranger based on a product formulation agreement that amounted to disposal (an *Aceto* theory). Both appellants argued that the retroactive

liability provisions of CERCLA were unconstitutional as applied to them in the case.

Specifically, with respect to Hercules' issues, the Eighth Circuit held that the

district court had correctly found that the site could not be separated into divisible geographic units. On a related matter, the appellate court held that there was insufficient evidence to allow for the division of the soil and ground water contamination, and that the evidence supported the finding of Hercules' responsibility for incineration of the drums that Hercules contended were a separate harm caused by Vertac and the government. Thus, Hercules was liable for cleanup of dioxin waste leaked from

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Community Celebrates Construction Completion at Torch Lake Site

On August 17, representatives from EPA Region 5, the Michigan Department of Environmental Quality, and USDA's Natural Resources Conservation Service (NRCS) joined members of surrounding communities to celebrate completion of construction activities at Michigan's Torch Lake Superfund site in Houghton County on the Keweenaw Peninsula. The ceremony, which took place at Lake Linden Village Park within the Torch Lake site, recognized the accomplishments of everyone involved in the cleanup, particularly the participation of nearby communities. Rehabilitation work at the site included removing debris, covering piles of stamp sands with clean soil, and stabilizing the clean soil with fast-growing plants, and resulted in the creation of approximately 800 acres of new terrestrial habitat.

Cleanup actions addressed contamination of the aquatic habitat and lake sediments by piles of stamp sands left over from seven decades of copper mining activities. The stamp sands were produced when ore was crushed to extract copper. The remedy was de-

signed to help the aquatic ecosystem recover naturally by preventing stamp sands from eroding into the surface water and causing further contamination of lake sediments with heavy metals.

Beginning in September 2003, EPA enlisted the help of local high school teachers and students in long-term monitoring of the newly created terrestrial habitats. With the help of faculty from the Western Upper Peninsula Center for Science, Mathematics and Environmental Education at the Michigan Technical University, five science teachers were trained to monitor bird and plant populations and soil fertility at locations throughout the site. The teachers have incorporated the monitoring activities and data analysis into their curriculum; the students will perform sampling activities in September 2006 and 2007.

For additional information, contact Mick Hans, EPA Region 5, (312) 353-5050.

Vertac, continued from page 1

the more than 28,000 drums stored on site as well as for the costs of drum incineration. Hercules' liability also ex-

tends to stillbottom leakage and the demolition, removal, and disposal of plant buildings, equipment, and process waste contents. The Eight Circuit found that the record adequately supported the district court's finding that the Health Assessment Document establishing EPA's cancer potency factor for risk assessment did not impose any rights or obligations and at most was a technical or advisory report. As to Crompton's liability issue, the Eighth Circuit referred to its earlier 2001 opinion and judgment of liability, and held that absent new controlling authority or clear error by the district court, Crompton would remain liable based on the law of the case. The Eighth Circuit determined that the constitutional issue raised by both parties was bound by precedent in that Circuit and would not be revisited. *United States v. Vertac Chemical Corp.*, 453 F.3d 1031 (8th Cir., 2006). Both parties have now petitioned the Eight Circuit for rehearing en banc.

For additional information, contact James Turner, Region 6 ORC, (214) 665-3159, or Clara Beitin, (202) 564-4795.

EPA Completes Soil Cleanup at Somers Plating Site

EPA Region 1 has completed excavation of contaminated soils from the Somers Plating site in Somers, Connecticut. EPA removed an estimated 8,800 tons of contaminated soil from the 3.62-acre former metal plating facility in a mixed residential and commercial section of town and shipped them off site for disposal. The 12-month removal action cost over \$2.5 million.

Ground water and surface soil sampling at the site began in 1998, revealing cadmium levels that exceeded Connecticut standards. In 2003, exploratory excavations conducted by a consultant for a potential buyer identified four metal hydroxide sludge lagoons. Samples of the lagoon sludge showed high concentrations of heavy metals, including chromium and cadmium. Region 1 conducted a de-watering operation with a ground water treatment system to facilitate excavation of the contaminated soils, pumping and treating approximately 60,300 gallons of water. Region 1 then backfilled and seeded two of the former lagoons, replanted wetlands vegetation in the other two, and installed two ground water monitoring wells.

For additional information, contact Dave Deegan, Region 1 Office of Public Affairs, (617) 918-1017.

Oak Ridge Stewardship Committee Recognized for Community Outreach

EPA has awarded the 2006 Citizen Excellence in Community Involvement

Award to the Oak Ridge Site Specific Advisory Board (ORSSAB) Stewardship Committee for its efforts to educate residents about the environmental cleanup process and ensure that properties at the Oak Ridge Reservation Superfund site with long-term contamination are tracked well into the future. The award, which was presented on June 29 at the EPA Community Involvement Conference and Training in Milwaukee, Wisconsin, is given to an individual or group working with EPA on hazardous waste issues.

The Stewardship Committee's accomplishments included designing and distributing an educational resource kit

that included lesson plans, videos, and a fictional case study for local teachers to use in educating students about environmental cleanups in general. The committee also helped make the location of contaminated parcels at the Department of Energy site and associated contamination notices available through the City of Oak Ridge's online GIS system and the online document retrieval system maintained by the Anderson County Register of Deeds. Making sure that this information is part of the public record is important because some areas of radioactive contamination are expected to remain an environmental threat for thousands of years.

For additional information, contact Karen L. Martin, martin.karenl@epa.gov.



2006 Citizen Excellence in Community Involvement Award presentation. Pictured left to right: Peter Osborne, ORSSAB; Suzanne Wells, EPA; Heather Cothron, ORSSAB; Kerry Trammell, ORSSAB; Constance Jones, EPA; Karen Martin, EPA.

Rocky Mountain Arsenal's Internal Parcel Deleted from NPL

EPA has announced the removal of 11.5 square miles of Rocky Mountain Arsenal (RMA) from the NPL. This action will enable the U.S. Army to transfer the property to the Rocky Mountain Arsenal National Wildlife Refuge, more than doubling its size to approximately 19 square miles. The deletion signals that EPA and the State of Colorado have determined that all cleanup actions necessary to protect public health and the environment on the 7,396-acre Internal Parcel have been completed.

The Internal Parcel is the fourth and largest partial deletion accomplished

since RMA was listed on the NPL in 1987. In January 2003, a 940-acre area known as the Western Tier Parcel was

“Nearly 80 percent of RMA has met cleanup standards and been deleted from the NPL.”

deleted and is now being redeveloped by nearby Commerce City as Prairie Gateway. In January 2004, two areas totaling more than 5,000 acres known as the Select Perimeter Area and the Surface Deletion Area were deleted. Al-

though most of the Internal Parcel is cleaned up, some areas within its boundaries were excluded from deletion. These include certain former processing areas, waste disposal sites, munitions demolition areas, structures, haul roads, and drainage areas. In addition, ground water in some areas will remain on the NPL and continue to be treated by existing water treatment systems. Cleanup of the remainder of the site is scheduled for completion by 2011.

For additional information, contact Jennifer Chergo, EPA Region 8, (303) 312-6601.

Owners Agree to Perform Time-Critical Removal at Halaco Engineering

EPA has reached a settlement with owners of bankrupt Halaco Engineering Company to perform a time-critical removal action at the company's facility near Ormond Beach in Oxnard, California. The settling parties agreed to remove or contain a 28-acre pile of hazardous waste and to pay all future costs of the removal.

Halaco Engineering operated the metal reclamation facility from 1965

to 2004. The facility consisted of two parcels on either side of the Oxnard Industrial Drain, a smelter and an unlined evaporation pond known as the waste management unit (WMU). The WMU is estimated to contain 400,000 cubic yards of waste, including radioactive slag and heavy metals. The smelter also contains large quantities of waste.

The Halaco site is surrounded by sensitive ecosystems, including the

Ormond Beach Wetlands and Lagoon, which serve as habitat for various threatened or endangered species. The removal includes implementing security measures, mitigating radioactive contamination, containing hazardous substances from the smelter and WMU, and removing liquid and solid wastes from containment structures, buildings, tanks, drums, and pit sumps.

For additional information, contact Robert Wise, On-Scene Coordinator, EPA Region 9, wise.robert@epa.gov.

EPA and Delaware Take Over Oil Spill Cleanup Oversight

On July 26, EPA and the Delaware Department of Natural Resources and Environmental Control (DNREC) assumed oversight of the cleanup of a 2,100-gallon waste oil spill into the Christina River. The spill occurred on July 15 when a hose ruptured during a tank transfer at an International Petroleum Corporation of Delaware (IPC) facility in Wilmington. Initial assessments and cleanup were directed by a unified command including the Coast Guard, EPA, DNREC, and the Siemens Corporation, which owns the IPC facility.

The spill affected a five-mile stretch of the Christina River before it was contained. Cleanup crews collected 1,739 gallons of oil and 10 large containers of oily debris from the river. Continuing cleanup efforts involve the use of absorbent material and booms to absorb and contain oily sheens on the Christina River and Brandywine Creek.

In addition, IPC hired Tri-state Bird Rescue to address the damage done to waterfowl exposed to the oil. Of the 82 birds collected so far, 20 have been released, 52 are being treated, and eight have died.



COAST GUARD PHOTO BY
CMDR. SPENCER L. WOOD

Contractor crews working on the Christina River near Wilmington, Delaware.

Region 7 Conducts Time-Critical Removal at United Zinc #1 Site

EPA Region 7 is conducting a time-critical removal action at several properties in Iola, Kansas based on sampling performed in April that revealed lead concentrations in soil above acceptable thresholds. The properties are part of the United Zinc #1 Superfund site, named after a zinc and lead smelter that op-

erated from 1902 to 1912. EPA will oversee removal of lead-contaminated soils from schools, daycares, residences, and industrial sites within the city limits.

The United Zinc #1 site was one of several zinc and lead smelting operations in the area. Sampling results showed elevated lead concen-

trations throughout the city, especially in older neighborhoods. Interviews with long-time residents revealed that material from the smelter was used as fill around home foundations, sidewalks, and driveways.

For additional information, contact Belinda Young, Community Involvement Coordinator, EPA Region 7, young.belinda@epa.gov.

Settlements Ensure Cleanup of Contaminated Sites in New Jersey

EPA has entered into settlement agreements with NCH Corporation (NCH) and FMC Corporation (FMC) for reimbursement of costs incurred cleaning up soil and ground water contamination at the Higgins Farm and Higgins Disposal Superfund sites in Somerset County, New Jersey. The Department of Energy (DOE), General Services Administration (GSA), and Department of Defense (DoD) also

settled their potential liabilities as parties to the NCH settlement.

Under the terms of its settlement, NCH will assume operation of a ground water treatment plant constructed by EPA at the Higgins Farm site, saving the Agency approximately \$12 million in future costs. NCH will also pay more than \$2 million to cover past cleanup costs at both sites. The United States has agreed to pay approximately \$9.3 million on behalf of DOE, GSA, and DoD

to cover past and future cleanup costs at both sites. FMC agreed to pay the United States approximately \$16.7 million, reimbursing EPA \$14.5 for past response costs incurred at the Higgins Farm site and \$2.225 for past and interim costs at the Higgins Disposal site.

For additional information, contact Benjamin Barry, EPA Region 2 Press Office, (212) 637-3651.

Company Employees Plead Guilty in Hazardous Waste Conspiracy Case

On July 13 and 14, two former employees of Hydromet Environmental (USA), Inc. pleaded guilty in the U.S. District Court for the Central District of Illinois to criminal charges arising from an indictment returned last January. John E. Pugh, a former plant manager, pleaded guilty to criminal conspiracy, and Ronald I. Martin, a former warehouse supervisor, pleaded guilty to making a false statement to Illinois EPA (IEPA).

The 11-count indictment charged Hydromet and five former officers and employees with conspiring between

1999 and 2003 to illegally transport, store, and dispose of hazardous waste in violation of RCRA, and conspiring to make false statements to IEPA. Other charges against the defendants included making false statements to IEPA and illegally transporting hazardous waste without a manifest. The investigation was conducted jointly by U.S. EPA's Criminal Investigation Division, the Illinois Department of Natural Resources, and IEPA.

Hydromet owned and operated an unsuccessful hazardous waste reclamation facility in Newman, Illinois. In order to maintain operations, the de-

fendants allegedly avoided the costs of safe disposal by storing hazardous wastes in a decrepit warehouse in East Chicago, Indiana; hiding them from IEPA on site; falsely declaring them to be non-hazardous; and disposing of them by sending them to a non-hazardous landfill in Indianapolis, Indiana. The indictment also charged the defendants with falsely telling IEPA that the facility was operational when it lacked equipment and components necessary for proper storage and treatment of hazardous waste.

For additional information, contact Kris Vezner, EPA Region 5, (312) 886-6827.

EPA and Kentucky Settle Oil Spill Claims

On August 15, EPA and the Commonwealth of Kentucky filed a consent decree with the U.S. District Court for the Eastern District of Kentucky settling claims under the Clean Water Act stemming from a January 2005 oil spill. Mid-Valley Pipeline Company (Mid-Valley) and pipeline operator Sunoco Pipeline L.P. (SPLP) agreed to pay a penalty of \$2.57 million for releasing approximately 260,000 gallons of crude oil into the Kentucky and Ohio Rivers.

The spill resulted from failure of a girth weld in a 22-inch-diameter pipe that had been in service since 1950. The oil slick was over 17 miles long and harmed hundreds of migratory waterfowl. The consent decree also imposes a \$300,000 penalty on Mid-Valley and another pipeline operator, Sun Pipe Line Company, for a November 2000 spill of approximately 63,000 gallons into Campit Lake in Claiborne Parish, Louisiana. The consent decree apportions \$1.4 million of the Mid-Valley/SPLP penalty to the United States and \$1.17 million to Kentucky. It also requires Mid-Valley and SPLP to reimburse more than \$120,000 of Kentucky's response costs. All penalty amounts due the United States, including the entire Lake Campit penalty, will be deposited in the Oil Spill Liability Trust Fund.

For additional information, contact Carl Terry, EPA Region 4 Press Office, (404) 562-8325.



On Remand, Federal Court Rejects PRP Rights Under CERCLA Section 107

By Clarence E. Featherson, OSRE

The U.S. District Court for the Northern District of Texas has held that PRPs do not have a cost recovery right or an implied contribution right under CERCLA Section 107. *Aviall Services, Inc. v. Cooper Industries*, 2006 WL 2263305, (N.D. Tex. Aug. 8, 2006) (*Aviall*).

Aviall Services, Inc. voluntarily incurred response costs to clean up contaminated property for which both Aviall and Cooper Industries were liable. Aviall then tried to recover CERCLA cleanup costs from Cooper through a Section 113 contribution action. In *Aviall Services, Inc. v. Cooper Industries*, 543 U.S. 157 (2004), the U.S. Supreme Court held that parties may bring contribution claims under Section 113(f)(1) only “during or following a civil action.” The Court remanded the issue of whether a PRP could seek cost recovery or contribution under Section 107.

On remand, the district court concluded that because Congress had created a contribution scheme in Section 113, reading a cost recovery right for PRPs into Section 107 “would at a minimum render key provisions of Section 113(f) superfluous, insignificant, or, in some instances, devoid of operative effect.” The court stated that because Section 113 contains the limitation of “during or following a civil action”, and Section 107 does not, “there is no reason why Congress would specify such a condition yet also allow a contribution action absent the condition.”

For additional information, contact Tina Skaar, (202) 564-0895.

Second Circuit Holds that PRPs May Recover Costs Incurred Voluntarily Under CERCLA Section 107

By Clarence E. Featherson, OSRE

The U.S. Court of Appeals for the Second Circuit (2nd Cir.) has ruled that PRPs may recover voluntarily incurred response costs under CERCLA Section 107, but rejected the plaintiff's claim because he failed to bring it within CERCLA's six-year statute of limitations. *Schaefer v. Town of Victor*, 2006 WL1921940 (2nd Cir. July 13, 2006).

Schaefer operated a landfill and incurred response costs in the process of closing it. He sued the Town of Victor, New York and other alleged waste contributors for contribution under CERCLA Section 107. The Second Circuit cited its previous ruling in *Consolidated Edison Co. v. UGI Utilities, Inc.*, 423 F.3d 90 (2nd Cir. 2005), that a PRP may rely on Section 107 for cost recovery only if its response costs were incurred voluntarily, e.g., under a voluntary cleanup agreement, not if it incurred them as a result of being sued or being the subject of an administrative proceeding.

Schaefer had entered into two consent orders with the New York State Department of Environmental Conservation (NYSDEC), in 1990 and in 1992, but had apparently begun incurring costs of preparing the landfill for closure in 1987. The Second Circuit viewed these pre-consent order response actions as voluntary, but ruled that they triggered CERCLA's six-year limitation period for recovering remedial response costs, which had expired by the time Schaefer filed his lawsuit against the Town of Victor.

For additional information, contact Clarence E. Featherson, (202) 564-4234.

Eighth Circuit Affirms PRP Cost Recovery or Contribution Under CERCLA Section 107

By Clarence E. Featherson, OSRE

The U.S. Court of Appeals for the Eight Circuit (Eighth Circuit) has held that a PRP may pursue an action for cost recovery or contribution against the United States under CERCLA Section 107. *Atlantic Research Corp. v. United States*, 2006 WL 2321185 (8th Cir. Aug. 11, 2006) (*ARC*).

Altantic Research Corp. (ARC) incurred costs voluntarily investigating and cleaning up soil and ground water contamination caused by retrofitting rocket motors for the United States. Because ARC did not conduct the cleanup “during or following a civil action”, however, *Cooper Industries, Inc. v. Aviall Services, Inc.*, 125 S.Ct. 577 (2004) (*Aviall*) barred it from bringing a Section 113(f)(1) contribution claim against the United States. Moreover, because ARC had not entered into a federal or state settlement for voluntary cleanup, it could not bring a Section 113(f)(3)(B) contribution claim. Consequently, it sued the United States under Section 107 to recover cleanup costs. The district court dismissed the claim, citing Eighth Circuit precedent that a liable party cannot sue under Section 107.

The Eighth Circuit stated that *Aviall* undermined the prior Eighth Circuit precedent cited by the trial court, and ruled that a liable party may sue for direct recovery of costs under Section 107, and furthermore, that Congress did not eliminate the preexisting implied contribution right under Section 107 by creating an explicit right to contribution in Section 113.

For additional information, Clarence E. Featherson, (202) 564-4234 or Joshua Epstein, (202) 564-6009.

Lynn Buhl Appointed OECA Deputy Assistant Administrator

Assistant Administrator Granta Nakayama announced that Lynn Buhl would join OECA on September 5 as Deputy Assistant Administrator.

Ms. Buhl has spent the last three years as a senior advisor to Maryland Governor Robert Ehrlich on environmental and policy issues, most recently serving as Deputy Secretary of the Department of Natural Resources as Chief Operating Officer. In that post, she was responsible for policy development, program adjustments, communications issues, and personnel matters. Prior to that, she served as the Acting Secretary of the Department of the Environment and co-chair of the governor's team responsible for developing and guiding legislation to reform Maryland's contaminated site cleanup program.

Earlier in her career, Ms. Buhl served as an Assistant Regional Counsel in EPA Region 5, an Attorney Advisor on the CERCLA Reauthorization Task Force in the Office of the Administrator in Washington, D.C., Director of the Southeast Offices of the Michigan Department of Environmental Quality, and Senior Staff Counsel for Environmental Legal Affairs at Daimler-Chrysler Corporation, where she managed Superfund cases and UST compliance and insurance issues.

John B. Askew Appointed Region 7 Administrator

EPA Administrator Stephen L. Johnson has appointed John B. Askew, president of the Iowa Soybean Association, to be the new EPA Region 7 Administrator.

Mr. Askew is a row crop producer of corn, soybeans, and alfalfa, as well as a specialty crop producer of contract popcorn and a marketer of white and food-grade yellow corn to tortilla processors and exporters. He is a producer representative to the Federal Crop Insurance Corporation, and a member of the Iowa Corn Grower's Association, the Iowa Farm Bureau, the American Soybean Association, and the American Farm Bureau Federation. Mr. Askew also holds a Bachelor of Science degree in agronomy from Iowa State University.

EPA Administrator Johnson said that Mr. Askew "has developed and implemented agronomic and environmental programs that help farmers evaluate alternative management practices, incorporate environmental management programs, and use watershed programming so they can become better growers, better managers, and better environmental stewards."

Mr. Askew's swearing in took place at a ceremony on September 7.

For additional information, contact Patrick Bustos, EPA Region 7, (913) 551-7969 or bustos.patrick@epa.gov.

EPA Updates Murphy Oil Site Sampling Results

EPA updated its Web site on July 13 to include results of additional samples collected at the Murphy Oil site in St. Bernard Parish, Louisiana. EPA is overseeing Murphy Oil's sampling activities pursuant to a FEMA Mission Assignment. The newly published results relate to samples taken as part of two ongoing efforts.

The first set of samples relates to assessment of contamination levels at residential and other sites. EPA posted the results for 835 such samples, representing about 10 percent of the samples Murphy Oil has taken to date. EPA sends these "split" samples out for independent analysis. The other set relates to soil samples taken after cleanup to confirm that the cleanup has achieved the Louisiana Department of Environmental Quality's Risk Evaluation/Corrective Action Program (RECAP) Standards. EPA posted the results of 40 such samples, again representing about 10 percent of the total taken by Murphy Oil so far. The levels of hazardous compounds detected in these samples were below applicable RECAP standards.

An aboveground storage tank at Murphy Oil's Mereaux Refinery was dislodged, lifted, and damaged in flooding associated with Hurricane Katrina. At the time, it contained 65,000 barrels of mixed crude oil, about 25,110 barrels (1.05 million gallons) of which were released. The released oil affected approximately 1,700 homes in a one-square-mile area as well as several canals. Murphy Oil notified EPA of the spill and requested assistance on September 4, 2005. EPA Plans to conduct additional sampling and other response actions in coming months.

For additional information, contact Beverly Negri, EPA Region 6, (214) 665-8157.



EPA's mission is to protect our nation's land, air and water. Citizens can help by reporting potential environmental violations at (800) 424-8802.

September 19-21, 2006
Waste 2006
 Stratford upon Avon, United Kingdom

September 19-21, 2006
WASTECON 2006
 Charlotte, North Carolina

October 16-19, 2006
Annual Conference on Soils, Sediments and Water
 University of Massachusetts at Amherst

October 22-25, 2006
National Recycling Coalition 25th Annual Congress and Expo
 Atlanta, Georgia

October 23-27, 2006
2006 National NAHMMMA Conference
 Bloomington, Minnesota

October 30 - November 1, 2006
2006 Land Revitalization Summit
 Austin, Texas

November 13-15, 2006
Brownfields 2006 Conference
 Boston, Massachusetts

November 21-24, 2006
International Ecological Fair Poleko 2006
 Poznań, Poland

December 3-6, 2006
2006 Emergency Preparedness and Prevention and Hazmat Spills Conference
 Valley Forge, Pennsylvania

January 22-25, 2007
Fourth International Conference on Remediation of Contaminated Sediments
 Savannah, Georgia

Glossary

CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act	OSRE	Office of Site Remediation Enforcement
EPA	Environmental Protection Agency	OSWER	Office of Solid Waste and Emergency Response
GIS	Geographic information system	PRP	Potentially responsible party
NPL	National Priorities List	RCRA	Resource Conservation and Recovery Act
OECA	Office of Enforcement and Compliance Assurance	UST	Underground storage tank

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<http://www.epa.gov/compliance/about/offices/osre.html>

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