

Appendix

<u>Interim Policy on CERCLA Settlements Involving Municipalities or Municipal Wastes</u>	<u>A</u>
<u>ESS Contracts POs and COs</u>	<u>B</u>
<u>Multi-Site Open Work Assignment</u>	<u>C</u>
<u>Checklist for Removal/Pre-remedial Sites</u>	<u>D</u>
<u>Revised Policy on Discretionary Information Release Under CERCLA</u>	<u>E</u>
<u>Quick Reference Guide for Using CERCLIS/WasteLAN</u>	<u>F</u>
<u>Checklist for PRP Search Tasks</u>	<u>G</u>
<u>PRP Search Enhancement Team Members/Contacts</u>	<u>H</u>
<u>On-Line Sources of PRP Information</u>	<u>I</u>
<u>Superfund Enforcement Directory</u>	<u>J</u>
<u>Financial Statements for Individuals, Businesses, and Trusts</u>	<u>K</u>
<u>Acronyms and Abbreviations</u>	<u>L</u>
<u>Glossary</u>	<u>M</u>
<u>Chapter References</u>	<u>N</u>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OSWER DIRECTIVE
#9834.13

DEC - 6 1989

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Interim Policy on CERCLA Settlements Involving
Municipalities or Municipal Wastes

FROM: Don R. Clay 
Assistant Administrator

TO: Regional Administrators, Regions I - X

I. INTRODUCTION

A) Focus of Interim Policy

This memorandum establishes EPA's interim policy on settlements involving municipalities or municipal wastes under Section 122 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA or Superfund) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). In particular, this interim policy indicates how EPA will exercise its enforcement discretion when pursuing settlements which involve municipalities or municipal wastes.¹ The municipal wastes addressed by this interim policy are municipal solid waste (MSW) and sewage sludge as defined below. This interim policy has been developed to provide a consistent Agency-wide approach for addressing municipalities and municipal wastes in the Superfund settlement process.

¹ This interim policy does not provide an exemption from potential CERCLA liability for any party; potential liability continues to apply in all situations covered under Section 107 of CERCLA.

OSWER DIRECTIVE #9834.13

Although this interim policy focuses on municipalities and municipal wastes, it addresses how private parties and certain kinds of commercial, institutional, or industrial wastes will be handled in the settlement process as well. It is important to address private parties and certain kinds of commercial, institutional, or industrial wastes in this interim policy because private parties sometimes handle municipal wastes or wastes of a similar nature and because municipal and private party waste streams are sometimes co-disposed at sites, particularly municipal landfills. The kinds of commercial, institutional, or industrial wastes covered by this interim policy include "trash from a commercial, institutional, or industrial entity" and "low-hazardous industrial wastes" as defined below.

There are three fundamental issues addressed by this interim policy. First is whether to notify generators/transporters of MSW or sewage sludge that they are considered to be potentially responsible parties (PRPs) and to include them in the Superfund settlement process. Such parties are usually municipalities, although they may include private parties as well. Second is how municipalities should be handled in the Superfund settlement process when the decision is made to notify them that they are PRPs under Section 107(a) of CERCLA. Third is how the treatment of municipalities and municipal wastes under this interim policy affects the treatment of private parties and certain kinds of

commercial, institutional, or industrial wastes in the Superfund settlement process.

Key questions specifically addressed as part of this interim policy include the following:

- o Information Gathering: Should municipalities be included in the Agency's information gathering process? Should generators/transporters of MSW or sewage sludge be included in the information gathering process?
- o Notification: Should municipalities be notified that they are PRPs? Should generators/transporters of MSW or sewage sludge be notified as PRPs?
- o Settlements: How should municipalities be handled in the Superfund settlement process? What settlement process and settlement tools should be used to facilitate settlement involving municipalities or municipal wastes?
- o Private Parties: How does the treatment of municipalities and municipal wastes affect the Agency's treatment of private parties and certain kinds of commercial, institutional, or industrial wastes?

B) Key Terms Used in Interim Policy²

The following defines the key terms used in this interim policy:

- o The term "municipalities" refers to any political subdivision of a State and may include cities, counties, towns, townships, and other local governmental entities.
- o The term "municipal solid waste" refers to solid waste generated primarily by households, but may include some contribution of wastes from commercial, institutional and industrial sources as well. As defined under the Resource Conservation and Recovery Act (RCRA), MSW contains only those wastes which are not required to be managed as hazardous wastes under Subtitle C of RCRA (e.g., non-hazardous substances, household hazardous wastes (HHW), or small quantity generator (SQG) wastes). Although the actual composition of such wastes varies considerably at individual sites, MSW is generally composed of large volumes of non-hazardous substances (e.g., yard waste, food waste, glass, and

² The definitions provided under this section are for the purpose of this interim policy only. Where possible, this interim policy includes already existing definitions used under other Federal environmental programs (e.g., under the Resource Conservation and Recovery Act or the Clean Water Act). However, nothing in this interim policy affects the regulatory efforts of these other programs.

aluminum) and may contain small quantities of household hazardous wastes (e.g., pesticides and solvents) as well as small quantity generator wastes.³ Many industrial solid wastes and some commercial and institutional solid wastes are managed separately from household wastes, but may enter the MSW waste stream.

- o The term "municipal landfill" refers to any landfill, whether publicly or privately owned, that has received municipal solid waste for disposal.
- o The term "sewage sludge" refers to any solid, semi-solid, or liquid residue removed during the treatment of municipal waste water or domestic sewage.⁴
- o The term "trash from a commercial, institutional, or industrial entity" refers to waste which is very

³ All household wastes, including household hazardous wastes, are unconditionally exempt from the Federal hazardous waste regulations promulgated under Subtitle C of RCRA (See 40 CFR Section 261.4 (b)(1)). With regard to non-household sources of solid waste, if such waste is not a listed or characteristic hazardous waste accumulated in quantities exceeding the small quantity generator limitations (i.e., less than 100 kg/month of hazardous wastes and less than 1 kg/month for acute hazardous wastes), such waste is not required to be managed in a RCRA Subtitle C hazardous waste treatment, storage, or disposal facility (See 40 CFR Section 261.5). "Household hazardous wastes" refers to those wastes which are generated by households and would be managed as hazardous wastes under RCRA Subtitle C if they were generated by a non-household in quantities exceeding the small quantity generator limitations.

⁴ The definition of sewage sludge is contained in the National Pollutant Discharge Elimination System Sewage Sludge Permit Regulations published in the Federal Register as a final rule May 2, 1989 (See 40 CFR Part 122.2).

similar to the MSW that is derived from households. This term covers only those wastes that are essentially the same as what one would expect to find in common household trash. This term does not include hazardous substances that are derived from a commercial, institutional, or industrial process or activity.

- o The term "low-hazardous industrial wastes" refers to high volume wastes that contain small quantities of hazardous substances derived from an industrial, commercial, or institutional process or activity. Examples may include certain paint sludges or industrial wastewaters.

II. CERCLA LIABILITY

Important questions have been raised about whether municipalities may be PRPs and whether municipal wastes (i.e., MSW and sewage sludge) may be considered hazardous substances under CERCLA.

A) Municipalities as PRPs

The statute does not provide an exemption from liability for municipalities. Municipalities may be PRPs like private parties if municipalities fall within the categories of liability specified under Section 107(a) of CERCLA. In general, Section 107(a) establishes liability for past and present owners or operators of facilities as well as generators or transporters of hazardous substances for the release or threatened release of

OSWER DIRECTIVE #9834.13

hazardous substances. Such parties may be liable for the costs of responding to a release or threatened release of hazardous substances as well as for resulting damages to natural resources. The specific categories of liable parties under Section 107(a) are:

1. the owner and operator of a vessel or a facility,
2. any person who at the time of disposal of any hazardous substance owned or operated any facility at which such hazardous substances were disposed of,
3. any person who by contract, agreement, or otherwise arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such person, by any other party or entity, at any facility or incineration vessel owned or operated by another party or entity and containing such hazardous substances, [commonly referred to as "generators"⁵], and
4. any person who accepts or accepted any hazardous substances for transport to disposal or treatment

⁵ Persons who fall into this category are commonly referred to as "generators," although liability under this Section extends beyond "true generators" of hazardous substances to include persons who arranged for the disposal or treatment of hazardous substances owned or possessed by such party or another party. The term "generator" is used throughout this document to refer to any party who is potentially liable under Section 107(a)(3).

facilities, incineration vessels, or sites selected by such person [commonly referred to as "transporters"].

Section 107(a) describes liable parties as "persons" and the definition of "person" under Section 101(21) includes municipalities and political subdivisions of a State. Municipalities may, therefore, be PRPs as part of CERCLA's broad definition of who is potentially liable.

B) Municipal Wastes as Potential CERCLA Hazardous Substances

Similarly, the statute does not provide an exemption from liability for municipal wastes. Municipal wastes may be considered hazardous substances if they are covered under the definition of hazardous substances in Section 101(14) of CERCLA. As indicated under the definitions of MSW and sewage sludge, these municipal wastes are generally characterized by large volumes of non-hazardous substances and may contain small quantities of household hazardous or other wastes, although the actual composition of the waste streams vary considerably at individual sites. To the extent municipal wastes contain a hazardous substance that is covered under Section 101(14) of CERCLA and there is a release or threatened release, such municipal wastes may fall within the CERCLA liability framework.

III. INFORMATION GATHERING

The Regions should include all municipal and private party owners/operators and generators/transporters in the information

gathering process, including the generators/transporters of municipal wastes. This means that municipal owners/operators as well as municipal generators/transporters should generally receive Section 104(e) information request letters and should otherwise be fully included in the information gathering process like private parties. Information obtained through such letters or through other means is important for determining (among other things) whether it is appropriate to notify a party as a PRP, including whether to notify a generator/transporter of MSW or sewage sludge as discussed below.⁶

IV. NOTIFICATION OF POTENTIAL RESPONSIBILITY

A) Owners/Operators

The same approach will be used for both municipalities and private parties when determining whether to notify them as owners/operators. Specifically, such parties will generally be notified where they were past owners or operators of facilities at the time of disposal of hazardous substances, or they are present owners or operators of facilities where hazardous substances have been released or there is a threatened release.

⁶ The Regions may accept and consider credible site-specific information from any party to supplement their own information gathering efforts as appropriate.

B) Generators/Transporters⁷

1. Municipal solid waste: Municipalities and private parties will be treated the same when determining whether to notify them as PRPs when they are generators/transporters of MSW. Specifically, such parties will not generally be notified unless:
- o the Region obtains site-specific information that the MSW contains a hazardous substance;⁸ AND
 - o the Region has reason to believe that the hazardous substance is derived from a commercial, institutional, or industrial process or activity.

This means that EPA will not generally notify municipalities or private parties who are generators/transporters of MSW if only household hazardous wastes (HHW) are present, unless the truly exceptional situation discussed below exists. The general policy

⁷ The categories of wastes discussed below, i.e., relating to municipal solid waste, sewage sludge, trash from a commercial, institutional, or industrial entity, and low-hazardous industrial wastes, are defined in the "Introduction" to this interim policy (See I.B.).

⁸ The term "site-specific" information refers to information pertaining to a particular Superfund site. "Site-specific" information does not generally include, for example, "general studies" conducted by EPA or other parties which draw general conclusions about whether MSW or sewage sludge typically contain a certain percentage of hazardous substances, unless the "general study" includes "site-specific" information obtained from the PRP or Superfund site in question. "General studies" may nonetheless be used to supplement "site-specific" information.

of not notifying parties who are generators/transporters of HHW extends to "HHW collection day programs" as well.⁹

This also means that such parties may be notified as PRPs if the MSW contains hazardous substances from non-household sources. Non-household sources include, but are not limited to, small quantity generator (SQG) wastes from commercial or industrial processes or activities, or used oil or spent solvents from private or municipally-owned maintenance shops.

Notwithstanding the above general policy, there may be truly exceptional situations where EPA may consider notifying generators/transporters of MSW which contains a hazardous substance derived only from households. Such notification may be appropriate where the total contribution of commercial, institutional, and industrial hazardous waste by private parties to the site is insignificant when compared to the MSW.¹⁰ In this

⁹ The term "HHW collection day programs" refers to programs that have generally been sponsored by municipalities or community organizations whereby residents voluntarily remove their HHW from their household waste. The HHW is then typically disposed of in a RCRA Subtitle C hazardous waste facility and the household waste is typically disposed of in a RCRA Subtitle D solid waste facility.

¹⁰ The Regions should consider both the volume and the toxicity of the commercial, institutional, and industrial hazardous waste when determining whether it is insignificant when compared to the MSW. In determining whether the volume is insignificant, the Regions should consider the total volume of such waste contributed by all private parties. In determining whether the toxicity is insignificant, the Regions should consider whether such waste is significantly more toxic than the MSW and whether such waste requires a disproportionately high treatment and disposal cost or requires a different or more costly remedial technique than that which otherwise would be

situation, the Regions should seriously consider notifying the generators/transporters of MSW containing a hazardous substance from households as PRPs and include them in the settlement process where it would promote either settlement or response action at the site.

2. Sewage sludge: Municipalities and private parties will be treated the same when determining whether to notify them as PRPs when they are generators/transporters of sewage sludge. Specifically, such parties will not generally be notified unless:

- o the Region obtains site-specific information that the sewage sludge contains a hazardous substance; AND
- o the Region has reason to believe that the hazardous substance is derived from a commercial, institutional, or industrial process or activity.

3. Trash from a commercial, institutional, or industrial entity: Parties who are generators/transporters of trash from a commercial, institutional, or industrial entity will not generally be notified as PRPs if such parties demonstrate to the Region that:

- o none of the hazardous substances contained in the trash are derived from a commercial, institutional, or industrial process or activity; AND

technically adequate for the site.

- o the amount and toxicity of the hazardous substances contained in the trash does not exceed that which one would expect to find in common household trash.

4. Any other hazardous substance, including low-hazardous industrial wastes: Municipalities or private parties who are generators/transporters of "any other hazardous substance" will generally be notified as PRPs if the Region obtains information that the substance is hazardous or that it contains a hazardous substance. This includes notification of private parties who are the generators/transporters of low-hazardous industrial wastes. "Any other hazardous substance" in this category refers to any hazardous substance covered under Section 101(14) of CERCLA other than hazardous substances that may be contained in MSW, sewage sludge, or trash from a commercial, institutional, or industrial entity (as discussed under IV.B.1., IV.B.2., or IV.B.3. above). The generators/transporters of hazardous substances that may be contained as part of the waste streams discussed under IV.B.1., IV.B.2., or IV.B.3. should be addressed as specified above.

V. SETTLEMENTS

A) Settlement Process

Once the notification decision is made, the general goal and overall process for reaching settlement at sites involving municipalities or municipal wastes is the same as for other sites. The general goal remains to negotiate with PRPs to reach one settlement agreement that provides complete resolution of all

pending CERCLA claims, and is consistent with both applicable statutory requirements and EPA's Interim CERCLA Settlement Policy.¹¹ This means that at sites where both municipal and private PRPs exist, EPA will attempt to include both types of parties in one settlement agreement.

Although one settlement agreement is the goal for each site, separate settlement agreements may be used at any site to facilitate settlement, where appropriate. This includes sites involving municipalities or municipal wastes. Separate settlements are not automatically available to municipalities and are generally available to such parties under the same conditions as for private parties. Examples of separate settlements are Section 122(g) de minimis settlements and cash-outs which may be used when they are consistent with applicable statutory requirements and existing EPA guidance.¹²

B) Settlement Provisions That May Be Particularly Suitable for Certain Municipalities

As indicated, once parties are notified as PRPs, the overall process and goals for reaching settlement at sites involving municipalities or municipal wastes is the same as for other Superfund sites. Nonetheless, there are some settlement provisions (e.g., delayed payments, delayed payment schedules,

¹¹ "Interim CERCLA Settlement Policy", February 5, 1985, 50 FR 5034.

¹² For example, see "Interim Guidance on Settlements with De Minimis Waste Contributors," June 30, 1987, 52 FR 24333.

and in-kind contributions) that may be particularly suitable for facilitating settlement with certain municipal PRPs because they take into account a municipality's status as a governmental entity.¹³

Such settlement provisions are not routinely available to municipalities. As a general rule, they may be considered where a municipality has successfully demonstrated to EPA that they are appropriate (e.g., where valid ability to pay or procedural constraints that affect the timing of payment exist). These settlement provisions may be embodied in separate settlements or they may be folded into a larger settlement that includes private parties. In addition, although these settlement provisions may be particularly suitable for municipalities, they may also be available to private parties, such as certain small businesses, where appropriate.

The following discusses how delayed payments, delayed payment schedules, and in-kind contributions may be used:

1. Delayed payment: If a municipality has demonstrated difficulty providing a lump-sum payment upfront for past costs or

¹³ In some circumstances a municipality's governmental status may impose practical constraints on its ability to carry out its legal obligation as a PRP under CERCLA. For example, a municipality may need to hold a special vote involving its legislative body or its citizens to gain approval to issue a bond or arrange other financing to cover cleanup costs at a Superfund site where it is a PRP. These settlement provisions are designed to take into account these types of unavoidable constraints that may exist.

for cleanup needs, the settlement could be structured to allow the municipality to pay at a specified future date. This would allow the municipality time to raise the money needed to cover its contribution. This may include an interest payment.

2. Delayed payment schedules (payments over time): An alternative to a delayed payment is to allow a delayed payment schedule where the settlement is structured to allow the municipality to pay over time based upon a predetermined schedule of payments. The payment schedule would be adjusted in such a way that the discounted present value of the payment would be greater than or equal to the settlement.¹⁴

3 In-kind contributions: The settlement could be structured to allow for an in-kind contribution, especially where a municipality can provide only a portion of its share of costs or is unable to provide a monetary payment. In-kind contributions may be made in conjunction with or in lieu of cash. Factors the Regions may use in considering the appropriateness of an in-kind contribution may include the overall financial health of the municipality, the amount of the municipality's share, the

¹⁴ Delayed payment schedules may include "structured settlements" which are settlements paid over time generally through an annuity. EPA is currently developing guidance, titled "Interim Guidance on the Use of Structured Settlements Under CERCLA," which will establish criteria for evaluating whether a particular site is a good candidate for a structured settlement. EPA expects to issue this interim guidance in the Spring of 1990.

value of the in-kind contribution, and the effect of the in-kind contribution on the overall effort to achieve settlement.

One mechanism for allowing an in-kind contribution could be a "carve-out" order when, for example, the municipal PRP has agreed to provide the operation and maintenance at the facility. Other in-kind contributions could include the use of trucks and equipment to carry out cleanup activities, the installation of fences and the provision of other security measures to control public access to the site, or the use of the municipality's sewage treatment plant.

C) Contribution Protection

Nothing in this interim policy affects the rights of any party in seeking contribution from another party, unless such party has entered into a settlement with the United States or a State and obtained contribution protection pursuant to Section 113(f) of CERCLA.¹⁵

VI. **DISCLAIMER**

This interim policy is intended solely for the guidance of EPA personnel. It is not intended and can not be relied upon to create any rights, substantive or procedural, enforceable by any party in litigation with the United States. The Agency reserves

¹⁵ Under Section 113(f), where EPA determines that settlement is in the best interests of the Federal government, CERCLA provides contribution protection to the settling parties for matters covered by the settlement. This may include a party who has not been notified as a PRP by EPA but wishes to settle its potential CERCLA liability.

OSWER DIRECTIVE #9834.13

the right to act at variance with this policy and to change it at any time without public notice.

VII. FOR FURTHER INFORMATION

For further information or questions about this interim policy, the Regions may contact Kathleen MacKinnon in the Office of Waste Programs Enforcement at FTS-475-9812. Inquiries by other persons should be directed to Ms. MacKinnon at 202-475-6771.

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ESS Contracts POs and COs

Region	Regional Contact	Phone Number	Fax Number
Region I	Filomena (Meme) DiNardo, PO (Zoned with Region 2)	617-918-1425	617-918-1291
Region II	Richard Graciano, PO Helen Eng, Alt. PO Kevin Weaver, CO	212-637-3271 212-637-4348 212-637-3357	212-637-4360 212-637-4360 212-637-3518
Region III	Joseph Tralie, PO Donna Kotsch, PO (Community Involvement) Donna McGowan, CO	215-814-3337 215-814-5529 215-814-5197	215-814-3015 215-814-3015 215-814-5211
Region IV	Jackie Dendy, PO Deborah Hoover, CO Shayla Jenkins, CS Charles Swan	404-562-8876 404-562-8373 404-562-8385 404-562-8848	404-562-8842 404-562-8370? 404-562-8370? 404-562-8842
Region V	Pankaj Parikh, PO	312-886-6707	312-886-0186?
Region VI	Karen Hartis, PO Georgia Okstel, CO Cheryl Hill, CS	214-665-6652 214-665-8310 214-665-2799	214-665-6660 214-665-7284 214-665-7284
Region VII	Jolleen Werst, PO Ron Stewart, CO	913-551-7108 913-551-7743	913-551-7063 913-551-7579
Region VIII	Carol Pokorny, PO Lisa Walker, CO	303-312-6970 303-312-6475	303-312-6409 303-312-6685
Region IX	Kathy Meltzer, PO/CO	415-972-3714	415-947-3558
Region X	(Does not have an ESS contract)		
Headquarters	Marlene Lemro, National Coordinator Joe Waddell, OAM Serve Center Joan Thurman, OAM ESS Team Leader	202-564-4257 202-564-4458 202-564-4497	202-564-0089 202-564-2558 202-564-2557

Statement of Work for the Multi-Site Open Work Assignment for Enforcement Support

Background

This Multi-Site Open Work Assignment (MOWA) is designed to provide EPA Region IX with expedited enforcement support to conduct Potentially Responsible Party Searches and related tasks to support Superfund enforcement actions. Through narrowly defined/directed tasks, this work assignment will provide EPA with a means to obtain timely, expedited support in acquiring and managing information concerning a Site. This information will be used in EPA enforcement actions such as negotiations, Administrative Orders and/or referrals to the Department of Justice. It is anticipated that the combined expenditure for tasks performed for any single Site under this work assignment shall normally not exceed \$20,000.

In order to address the unique nature of this expedited work assignment, a phased approach towards implementation will be used. The contractor shall acknowledge receipt of this MOWA statement of work within 10 work days, as currently provided in the ESS contract. The contractor will then prepare a general work plan describing the methods and procedures to be employed to accomplish each of the specific tasks described in this MOWA statement of work. The contractor's work plan shall be submitted within 20 calendar days after acknowledgment of this work assignment. The EPA Project Officer (PO) shall be the approving official for this MOWA.

Another unique feature of this work assignment is negotiated pricing at the general work plan stage. The contractor shall use Attachment A to provide cost and level of effort estimates for each and every task in this work assignment. Estimated LOE for each task will be based on a "per unit" basis using the requirements and parameters described with each task. Unit pricing will be based on estimated expenditures of time by P-level, reproduction costs and administrative costs (computer time, overhead, etc ...) but will not include related travel expenses, which are Site specific. (During actual performance, departures from this "unit" pricing will be addressed and justified in the Site Implementation Memorandum as discussed below.) Subsequent initiation of work under this work assignment will be controlled through the use of Technical Direction, Memoranda, prepared by EPA and approved by the PO, and Site Implementation Memoranda and Monthly Status Reports, prepared by the contractor and approved by the EPA WAM.

Technical Direction Memorandum:

After approval of the general work plan, the EPA Work Assignment Manager (EPA-WAM) shall initiate site-specific tasking through the use of a Technical Direction Memorandum (TDM) to the contractor. This memorandum must be approved by the PO, and will direct the contractor to perform specifically enumerated tasks for a designated Site and describe the type of deliverables required (e.g. Letter Report; Documents; certified copies.) The memorandum will further provide the contractor with a Site Account Number to be used to charge work performed for the Site and a target date for completion of the work requested.

Site Implementation Memorandum:

Upon receipt of a TDM, the contractor may begin work immediately. Within 10 working days, the contractor shall provide the EPA WAM with the following information in a Site Implementation Memorandum (SIM):

- 1) Enumeration of the tasks to be performed with the estimated LOE (by P-level) and dollars anticipated for each specific task.
- 2) Delineation of the personnel and P-level of employees who will perform the tasks assigned.
- 3) Estimate of travel expenses (including P-level of traveler) to complete the tasks identified.
- 4) Justification of any tasks which are anticipated to exceed the "per unit" price used in the MOWA work plan.

The contractor shall not exceed \$2,000.00 in expenses, including ODCs, per Site, prior to approval of the SIM estimates by the EPA PO, which approval shall be documented with an acceptance TDM signed by the PO. Expenses exceeding \$2,000.00 will not be allowed and should not be incurred by the contractor until and unless such approval is received by the contractor. SIM approval shall normally occur within 5 working days of receipt of the SIM

Monthly Status Reports:

The contractor shall submit a Monthly Status Report to the EPA WAM, containing information through the 15th of each month and to be submitted by the 20th of each month. The report shall describe by Site the status of work being performed as well as the LOE in hours and dollar expenditures to date. In addition, the contractor shall also include a concise summary of costs incurred and LOE hours expended, accrued through the date of the report, attributed by Site, for the entire MOWA work assignment. This summary is for the purpose of tracking hours of LOE and dollars expended for the MOWA work assignment as a whole and is primarily for the benefit of the PO. More detail on the format and content of this report is contained in the section entitled SCHEDULE OF DELIVERABLES.

Scope of Work

The purpose of this work assignment is to provide narrowly directed support to EPA for enforcement related activities. The contractor's staff assigned under this work assignment shall be trained, qualified and appropriate to the specific task(s) directed. They shall also have knowledge of the general liability scheme under CERCLA, and be familiar with the following pertinent Department of Justice reviews, EPA guidance documents, and search manuals:

1. Potentially Responsible Party (PRP) Search Manual, OSWER Directive 9834.6, August 1987;
2. PRP Search Supplemental Guidance for Sites in the Superfund Remedial Program, OSWER Directive 9834.3-2a, June 29, 1989; and
3. Guidance on Preparing and Releasing Waste-in Lists and Volumetric Rankings to PRPs Under CERCLA, OSWER Directive 9835.16, February 22, 1991.
4. Elements of Liability Under Sections 104, 106, and 107 of CERCLA, U.S. Department of Justice, (current edition).

In most instances, the contractor will not be tasked to provide a comprehensive written report as envisioned in the PRP Search Supplemental Guidance (OSWER Directive 9834.3.2a) and the EPA PRP Search Manual. Specific deliverables will be identified in the Site specific TDM. A Completed Activity-Summary Memorandum shall generally be submitted at the completion of all tasks for each Site, as directed by the EPA WAM. This memorandum will briefly describe all activities performed to accomplish the directed tasks and a compilation of costs incurred.

Tasks Allowable Under this Work Assignment

The following tasks are included and authorized under this work assignment and may be assigned for a specific Site by the EPA WAM.

1] **Title Searches** - The EPA WAM will provide the contractor with a Site address (s) , a location map and, where available, specific parcel number(s). As specifically directed by the EPA WAM, the contractor will perform some or all of the following related tasks.

- a) Obtain specifically identified title documents (and/or parcel maps).
- b) Perform title searches, obtaining all documents for a specified period which evidence both current and possible past owners, lessors and lessees for a designated Site address(s).
- c) Analyze title documents in order to provide a clear opinion as to the true ownership, quality, condition, and clarity of title for a designated period of time. This may include preparation of title tree diagrams and accompanying narrative reports.

Deliverables for this task shall include the following: copies of requested documents (certified or plain as specified in the TDM); a memorandum presenting title analysis conclusions (including related tables, charts or other aides as directed by the EPA WAM).

2] **Interviews** - The EPA WAM may direct the contractor to interview designated government/public officials and/or individuals connected with a Site's history to obtain information regarding a Site. Unless otherwise specified in the TDM, the contractor will prepare an appropriate outline focusing on proposed questions and methodology for the EPA WAM's approval prior to conducting the interview. Interviews may be conducted via telephone at the EPA WAM's written technical direction. Deliverable shall be a summary of the results of the interview which identifies at a minimum the date, time, place of interview, person(s) interviewed (including name, address, telephone number at work and home, occupation, and relation to the Site), interviewer, and a comprehensive summary of the information obtained during the interview.

3] **Document Collection** - At the written technical direction of the EPA WAM, the contractor shall obtain documents from designated public agencies, private parties, or other sources. EPA WAM will provide a list of the specific agencies or other sources to be contacted, as well as the types of documents to be collected.

Deliverable shall be the submission of a single copy (unless multiple copies are specifically requested by the WAM in the TDM) of the documents requested, with appropriate document identification as required in the TDM.

- 4] **Document Indexing** - At the written technical direction of the EPA WAM, the contractor shall be tasked to index a collection of documents obtained in connection with a Site. This indexing shall be performed in a manner and format consistent and compatible with the Superfund Records Center indexing format, but may, at the EPA WAM Is written technical direction, include additional entry fields for issue coding of documents.

Deliverable shall be the submission of a single hard copy of the document index plus one electronic version on 3.5 inch disc in a format compatible with Word Perfect 5.1, or such other software as may be specified through written technical direction by the EPA WAM. Alternatively, with the EPA WAM's approval, the contractor may transmit the document index directly to the Superfund Records Center via modem.

- 5] **Data Entry** - At the written technical direction of the EPA WAM, the contractor shall enter data into a CERCLA § 104(e) Information Letter Tracking System (to be provided by EPA) which will track mailing, receipt and return response to EPA Information Requests. At the written technical direction of the EPA WAM, the contractor may also be tasked to provide an analysis of the 104 (e) response to determine it I s completeness and/or to extract information.

Deliverable shall include updated 104 (e) tracking information, and/or a memorandum summary of data extraction for each respondent providing one or more of the following:

- Evidence of a release of hazardous substance.
- Purpose and/or use of facility.
- Evidence of a release of hazardous substances.
- Presence of physical features which significantly impact release or potential for release.
- Identification of chemicals used.
- Identification of waste streams and disposal methods.
- Corporate formalities and relationships of the subject.
- Apparent financial viability of subject.

- 6] **Waste Stream Analysis** - At the written technical direction of the EPA WAM, the contractor shall perform a chemical process analysis or a waste process analysis for a subject business activity, using information provided by EPA, by the subject business, or available from public sources, as specified in the TDM. If the contractor determines that the information supplied is insufficient to provide a reliable analysis, the contractor shall provide written recommendations specifying the kind of information and potential or probable sources for obtaining such additional information as is necessary to complete this task.

Deliverable shall be the submission of a technical memorandum detailing to the extent possible the probable waste stream and disposition of wastes for subject business and business activities.

- 7] **Business Status** - At the written technical direction of the EPA WAM, the contractor shall develop and/or resolve issues relating to the business structure, "familial" relationship(s), and ownership and control of business entities. This shall be accomplished through the use of public information sources, on-line data retrieval services, and by obtaining and analyzing documents, including responses to Information Request Letters, as directed by the EPA WAM through written technical direction memoranda.

Deliverable shall be a written submission summarizing the requested information, together with documentation to support conclusions drawn, either in a technical memorandum or incorporated within a larger deliverable.

- 8] **Financial Viability** - At the written technical direction of the EPA WAM, the contractor shall provide a financial viability analysis using EPA supplied information and/or publicly available information in order that EPA may make a determination regarding an entity's ability to satisfy Superfund liabilities.

Deliverable shall be the submission of a technical memorandum outlining the financial condition of the subject. At a minimum, the technical memorandum shall include either or both of the following: a high and low lump sum, figure based upon the entity's financial condition with a justification of the figures; and an analysis of the entity's ability to make installment payments over time. The deliverable shall be more fully described in the TDM authorizing performance of this task.

- 9] **Current Status** - At the written technical direction of the EPA WAM, the contractor may be tasked to verify and/or provide current names, responsible official and address information for subject entity(s). This task will normally be accomplished through use of on-line data retrieval sources, but may also require retrieval of publicly available documents, as directed, by the EPA WAM through written technical direction.

The deliverable will be an updated list providing current information, accompanied by printouts of the database- supplied information and/or requested documents.

- 10] **Expert Opinion** - At the written technical direction of the EPA WAM, the contractor may perform specialized tasks such as providing current real property appraisals, providing cadastral and/or spotted surveys of property to determine the location of physical features or structures in relation to property bounds, etc. , or providing expert opinions from technical experts, relating to any other task or tasks described in this MOWA work assignment.

The deliverable shall be a technical report resolving specific technical issues as assigned in a TDM, with whatever attachments or graphical presentations are authorized by the TDM.

- 11] **Summation & Reporting** - At the written technical direction of the EPA WAM, the contractor shall review all available information in order to develop a summary report which shall provide a chronological presentation of known facts (properly referenced to supporting documentation) regarding a Site. The contractor may also be required through written technical direction by the EPA WAM to prepare a separate memorandum detailing the evidence relating to the liability of each identified entity connected with a Site, containing the following general elements (unless otherwise directed):

- Overall Facility Summary
- Corporate Status / Business Information Financial Viability
- Property Ownership
- Detail of Operations Conducted Evidence of Release
- Relation to other PRPs.

The deliverable shall be a report and/or memorandum as identified above. Memoranda presenting evidence of liability will be marked as "Enforcement Confidential - Prepared in Anticipation of Litigation. 11 Since this report or memorandum does not include an analysis or appraisal of the strength or quality of the evidence, nor an analysis of liability, this deliverable will not ordinarily be classified as legal analysis. Chronological reports only shall not be marked Enforcement Confidential.

Schedule of Deliverables

A general Work Plan shall be prepared, as required under the ESS Contract, in response to this Statement of Work and submitted to EPA for approval within 20 calendar days after acknowledgment of receipt of this Statement of Work. Upon approval, performance of any tasks under this work assignment will be on an as-assigned basis through the use of Technical Direction Memorandum issued by the EPA PO and the EPA WAM, using the following general schedule.

Site Specific Tasking

EPA WAM will initiate a Technical Direction Memorandum to the Contractor providing general background information concerning the Site, a Site account number to be used, the specific tasks to be performed, the desired time frame for completion and a summary listing of known or suspected PRPs who may be involved with the Site. **This TDM must be signed by an PO, and is not valid without such signature.**

Within 48 hours (not including weekends and holidays) , the contractor will advise the EPA CO/PO verbally of any apparent or potential conflicts of interest that may arise concerning this Site. Thereafter, should additional information disclose an apparent conflict, the contractor shall appraise the EPA CO/PO within one working day.

Within five (5) work days of receipt of a TDM, the contractor shall submit a Site Implementation Memorandum detailing personnel assigned as well as anticipated schedule and projected costs to complete the tasks assigned. The EPA PO will approve this estimate with a TDM authorizing work to be performed or will notify the contractor in writing of any objections or disapproval. Any changes to the initial TDM shall be effected through sequential amendments to the TDM.

When all tasks for a specific Site have been completed, the EPA WAM shall, at the WAM's discretion, notify the Contractor WAM in writing to prepare a Completed Activity - Summary Memorandum which will summarize all tasks completed for the Site and include a re-cap of all expenses incurred for the Site. This Completed Activity - Summary Memorandum shall be completed by the Contractor within ten (10) working days after notification of completion by the EPA WAM.

Monthly Reports

The contractor shall submit a monthly report to EPA detailing the following information for each Site for which activities have been performed or costs incurred:

For each Site:

- Activities conducted during the month. Costs incurred, by task, per month.
- LOE hours expended, by task and P level, for the month.
- Total monthly costs and LOE hours expended. Total Work Assignment Costs to date.
- Projected future costs to completion.

The information contained in the report shall be current through the 15th of each month, and the report shall be transmitted to the EPA PO by the 20th of each month.

The contractor is also expected to maintain frequent, verbal communication with the EPA WAM on progress, problems, issues or suggestions relative to individual Site tasking or the overall Work Assignment.

Period of Performance

The period of performance for this work assignment is through December 1, 1995.

Work Assignment Manager

The primary EPA Work Assignment Manager for this work assignment is **Cliff Davis**, who can be reached at (415) 744-2377. The alternate EPA WAMs for this work assignment are Mark Calhoun, Steve Simanonok and Nancy Riveland-Har, Lois Green, and Kim Muratore. Other WAMS may be added as needed. Any WAM may initiate TDMs, however only POs may sign and authorize TDMs.

ESTIMATED PER UNIT PRICING

Task	LOE Hours				Contract MGMT.*	Dollar
	P4	P3	P2	P1		
1] Title Search (Per Parcel)						
a) Document						
b) All Docs.						
c) Analysis						
2] Interviews (Per Interview)						
a) Gov't. Agency						
b) Individual						
3] Document Collection (500 pgs./ 2 or fewer sources)						
4] Document Indexing (500 pgs.)						
5] Data Entry (10 letters)						
a) Tracking only						
b) Extraction						
6] Waste Stream Analysis (1 analysis)						
7] Business Status (1 entity)						
8] Financial Viability (1 analysis)						
9] Current Status (1 entity)						
10] Expert Opinion (1)						
11] Summation & Reporting						
a) Chron. Report						
b) Enf. Memo						

Monthly Contract Maintenance

* CONTRACT MANAGEMENT is primarily quality assurance/quality control (QA/QC) activities, together with administrative activities such as time charging, logging in - assignments, and routing documents.

CHECKLIST FOR REMOVAL/PRE-REMEDIAL SITES

Completion of this form is not mandatory, nor is it directed solely towards a specific type of responder. The first on-site responder may begin the checklist which may include contributions from any of the following: EPA site assessment manager (SAM), on-scene coordinator (OSC), civil investigator (CI), remedial project manager (RPM), EPA contractor, state staff, or state contractor. This form should be filled out for future use by EPA or state staff in preservation of evidence related to the identification of potentially responsible parties. This form may be filled out at any point during the site discovery, assessment/investigation, or response phase.

It may not be possible to provide information for each of the items on this form but, providing information on as many of the items as possible will improve the overall efficiency of the site remediation and enforcement processes. When you have completed it to the extent feasible, please distribute copies of this form to the appropriate EPA and state personnel (e.g., civil investigators, EPA or state attorney, OSC, RPM, etc.), and place the original in the site file.

1. Potential Site referred:

Region: _____ Site Name: _____

Location: _____

2. Referred by:

Department/Agency	Contact Name	Phone #
<input type="checkbox"/> State		
<input type="checkbox"/> National Response Center		
<input type="checkbox"/> Other:		

3. Basic site information was requested to be submitted to the regional office from the above referral contact:

Yes No

4. Identification of person completing this checklist:

Organization: _____ Name: _____

Title: _____ Phone #: _____

Mailing Address: _____

5. The OSC (or other First Responder) determines the urgency of the situation at the site, assessing the factual information referred against the criteria set forth in the National Contingency Plan.

6. Site Team formed, OSC, Attorney, Enforcement Specialist, Civil Investigator, Site Assessment Manager, Remedial Project Manager, EPA contractor, State staff, etc.

7. Site Team reviews information to ascertain responsible corporate officers, registered agents, and principal environmental and/or health and safety contacts. Some examples of information to be reviewed and their source is:

- U.S. EPA media files (NPDES permits, RCRA information, EPCRA releases, CAA permits)
- State media files
- Local health department files
- Historical society information/historical photos
- Newspaper archives
- Local university archives
- Sanborn fire insurance maps
- Other _____

8. Obtain access agreement(s) with last known owner(s) of site property:

- Yes No Date obtained: _____

9. Identification of the property to be visited:

- Copy of deed
- Address: _____
- Plat #: _____
- Cross Street Location: _____

10. Identification of possible contacts that may be a source of information in the future, including complete names, titles, addresses, and telephone numbers. Include all people you encounter on the site, and anyone volunteering information about the site: [*Owners/operators, prior owners/operators, generators, transporters, local authorities, state and other federal agencies, local libraries, other]

Association With Site and Number of Years*	Contact Name	Address	Phone No.

11. Interviews were conducted with the following contacts:

Interviewee	Association With Site and Number of Years	Date Interview Conducted	Interviewer	Transcript Available Yes/No

12. Information about records located onsite:

Type of Records *	Location of Records	Condition of Records**	Name of Person in Possession of Records

*Types of records, to include but not limited to: log books, driver’s tickets, utility bills, payroll records, letterheads, or other specific correspondence or records.

**Please identify if: contaminated, damaged, poor quality, good quality, other

13. Are there file cabinets on site?

Number of File Cabinets	Location of File Cabinets	Condition of Cabinets/Files

14. Were photographs taken? *[Note: photographs should conform to accepted photographic record protocol. Refer to TAT, site assessment, and criminal investigators for EPA photographic protocol]*

Yes No

Photographs were taken of: _____

15. Were drums found at the Site? Yes No

Number of Drums: _____

Number With Labels: _____

16. Was sampling done? Yes No

17. Neighbors near the site:

Name	Association With Site and Number of Years	Address	Phone No.	Interviewed and Date Yes/No

18. Additional potential sources for gathering site information:

- Neighboring Businesses
- County Recorder:
 - Deed Information
 - Past Tax Information
 - Sidwell Maps
- Financial Information
 - Financial Institutions
 - Accountant Information
 - Commerce Clearing House (CCH) Publications (Capital Transactions)
- PRP Information on EPA Databases
 - CERCLIS
 - IDEA
 - FINDS
 - ERNS
- Electronic Database Review
 - Choice Point
 - Dun & Bradstreet
 - Lexis/Nexis (or Westlaw)
 - Corporate Information
 - Prior lawsuits, bankruptcy filings, SEC filings
 - Internet sources

19. OSC plans for:

- Removal action
- Removal scoping
- Public participation
- Establish administrative record

20. Based on information gathered to date, appropriate enforcement activities should be taken:

- Issue information request
- State an opportunity, in the information request, for the PRPs to provide information on additional PRPs
- Initiate title search
- Review relevant site records
- Initiate PRP search report
- Oral/written general notice letters issued to known PRPs

21. OSC prepares Action Memorandum

- Develop negotiation strategy
- Prepare draft administrative order on consent (AOC)
- Negotiate AOC or issue unilateral administrative order (UAO)

[Note: when issuing UAOs, the enforcement team should follow guidance on Administrative Reforms - the UAO should be issued equitably to the largest manageable number of parties and the team should document the reasons why the UAO is not issued to all PRPs, if appropriate]

22. Site cleanup:

- PRP-lead
- Fund-lead

23. Cost recovery phase:

Complete enforcement investigations:

- Followup on earlier PRP search
- Update title search if necessary

Cost recovery activities:

- Itemized cost summary
 - Send demand letters
 - Cost recovery referral
 - Close-out memorandum (where appropriate, if case is not referred to DOJ)
-
- Cost documentation package
 - Work performed documents

Please use the following space to provide additional noteworthy information regarding this checklist and the site:

PLEASE ATTACH ALL RELEVANT INFORMATION THAT HAS BEEN REFERENCED IN THIS CHECKLIST AND DISTRIBUTE TO THE APPROPRIATE REGIONAL CIVIL INVESTIGATOR, SITE FILE, AND OTHER EPA OR STATE PERSONNEL AS APPROPRIATE.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 31, 1993

MEMORANDUM

SUBJECT: Revised Policy on Discretionary Information Release
Under CERCLA (OSWER Directive 01a)

FROM: Bruce X. Diamond, Direct
Office of Waste Programs Enforcement

William A. White, Enforcement Counsel for Superfund
Office of Enforcement

TO: Hazardous Waste Division Directors, Regions I - X
Regional Counsels, Regions I - X

This memorandum transmits the Revised Policy on Discretionary Information Release Under CERCLA, OSWER Directive 9835.12-01a. The draft policy was issued for review and comment on September 3, 1992.

OSWER Directive 9835.12-01a revises Releasing Information to Potentially Responsible Parties at CERCLA Sites, OWPE and OECM Waste, March 1, 1990, OSWER Directive 9835.12. In addition, the Directive is consistent with Guidance on Preparing and Releasing Waste-in Lists and Volumetric Rankings to PRPs Under CERCLA, OWPE, February 22, 1991, OSWER Directive 9835.16. Finally, the Directive supersedes all other previous policy and guidance on the question of discretionary information release under CERCLA.

We are confident that this revised policy will help to streamline and expedite the CERCLA settlement process. In addition, we believe that the policy will send a clear message to the PRP community that the Agency endeavors to administer the Superfund enforcement program in as fair and equitable a manner as practicable.

We would like to thank your staffs for the assistance they provided in developing this policy. Questions concerning implementation of the policy may be addressed to Bruce Gruenewald in the Office of Waste-Programs Enforcement (OS-5502G/FTS 703603-8935) or Patricia Sims in the office of Enforcement (LE-134S/FTS 202-260-2860).

Attachment

Superfund Branch Chiefs, Regions I - X
Regional Counsel Branch Chiefs, Regions I - X
PRP Search Chiefs, Regions I -
Revised Policy on Discretionary
Information Release Under CERCLA
OSWER Directive 9835.12-01a

OSWER Directive 9835.12-01a revises Releasing Information to Potentially Responsible Parties at CERCLA Sites, OWPE and OECM Waste, March 1, 1990, OSWER Directive 9835.12. In addition, the Directive is consistent with Guidance on Preparing and Releasing Waste-in Lists and Volumetric Rankings to PRPs Under CERCLA, OWPE, February 22, 1991, OSWER Directive 9835.16. Finally, the Directive supersedes all other previous policy and guidance on the question of discretionary information release under CERCLA.

Information release is an important means by which the Agency can facilitate PRP organization and coalescence. This serves the Agency's interests by helping to streamline and expedite settlements with PRPs. The purpose of this revised CERCLA information release policy is to minimize potential impediments to facilitating PRP organization and coalescence.

Consequently, information on PRP waste contribution at CERCLA sites normally should be made available to all PRPs as soon as practicable, preferably well before special notice is issued. Regions should consider releasing information through PRP meetings or directly to PRPs or PRP steering committees.

Information on PRP waste contribution at CERCLA sites, including that developed by EPA, can consist of manifests, waste tickets, logbooks, billing records, canceled checks, process engineering information, waste-in lists, volumetric rankings, and responses to section 104(e) information requests. Generally, information on PRP waste contribution should be released to PRPs and not withheld, nor should such information be made available only through Freedom of Information Act (FOIA) requests.

If information on PRP waste contribution is potentially subject to claims of privilege or FOIA exemptions, there nonetheless should be a preference in favor of release. Information subject to privileges or exemptions should be withheld only if a case-specific determination is

made by program personnel and legal counsel (and briefly noted in the case file) that an important purpose is served by withholding the information from the PRPs or the public. However, documentation concerning the exercise of prosecutorial discretion, such as which parties will be noticed or pursued in litigation, normally would not be releasable. When releasing information, the Agency must, however, ensure that disclosure of information that may be entitled to confidential treatment is made pursuant to section 104(e)(7) of CERCLA and 40 CFR Part 2.11

In addition, under Agency policy, documents falling within Exemptions 7 (C) (privacy information) and 7 (D) (confidential informants) of FOIA are subject---to mandatory withholding. Sometimes, however, information falling within these exemptions will be contained in otherwise releasable records, and this information must be redacted prior to release.

The Agency also should make reasonable efforts to assist de minimis parties and parties unfamiliar with Superfund in the coalescence process by providing them with additional Superfund program information. De minimis parties can be small businesses or others with little or no previous Superfund experience. The Agency can implement this aspect of the policy by distributing Superfund background information prior to PRP meetings, and by holding special meetings for parties who are new to the program or who lack experience in the CERCLA settlement process.

This guidance and any internal procedures adopted for its implementation are intended solely as guidance for employees of the U.S. Environmental Protection Agency. Such guidance and procedures do not constitute rulemaking by the Agency and may not be relied upon to create a right or benefit, substantive or procedural, enforceable at law or in equity, by any person. The Agency may take action at variance with this guidance and its internal implementing procedures.

Party Information

This *Quick Reference Guide* will provide information on how to access, view, and enter information into the **Party Information** screens in the Enforcement module of WasteLAN. The **Party Information** screen contains relevant data pertaining to a Party at a site. There are eight tabs in the **Party Information** section which contain general party information, the sites at which each party is involved, their involvement, contacts, and other pertinent information.

User Access Roles for Party Information Screen

Read Only: Headquarters Manager, Read Only, Community Involvement Coordinator, Headquarters Staff, Headquarters Budget/SCAP Coordinator.

Delete/Edit Rights: Regional Manager, Site Manager, Administrative Support/Data Entry, Superuser/All, Remedial Project Manager, Regional Attorney, Site Assessment Manager, On-Scene Coordinator, Civil Investigator, Cost Recovery Specialist/Data Entry, Office of Regional Council (ORC) Data Entry Staff, IMC/IMC Staff/Budget Coordinator, Regional Manager Reviewer, Cost Recovery Coordinator, Brownfields Coordinator.

Accessing and Viewing the Party Information Screens

1. To access the **Party Information** screens from the Views menu, select Enforcement, Party Search/Information, and then Party Search. The **Party Search/ Information** screen is displayed.
2. You can also access the Party Information screen by highlighting (click once) a party in either the 'Parties in Search Results' or 'Parties Associated With Current Site' boxes on the **Party Search** screen and clicking the *Info* button, or by clicking the *Add Party* button on any **Parties** tab within the Enforcement module.

NOTE: For more information on searching for a party on the **Party Search/Information** screen, please see the *Party Search/Information Screen Quick Reference Guide*.

Party Information Tabs

The Party Information screens contain data pertaining to a party at a site, including the party name, address, the sites at which they're involved, their involvement, and contacts. There are eight tabs in the Party Information section: **Summary, Party Details, Associated Sites, Involvement, Substance, Enforcement History, Contacts, and Comments.**

Party Information

Summary Tab

The **Summary** tab gives you an overview of the **Party Information** section. The **Party Information** screen defaults to the **Summary** tab when accessed by clicking on the *Info* button on the **Party Search/Information** screen. These fields are uneditable. Information on the **Summary** tab includes Party Name, Address, Party Type and Sites and Actions associated with the party. To enter information, double-click on the field and you will be brought to the tab that contains the data entry screen for that field. For example, if you click on the Party Name field, you will be brought to the **Party Details** tab.

Some fields look like a dropdown list. These are all the fields where it is possible to select multiple values on the data entry screen. On this screen, the dropdowns display all sites with which the party is associated, the contacts related to the party, the Actions associated with the party, and the party type.

You will always have to return to the **Summary** tab to save the information you entered on each of the other tabs.

Party Details Tab

The **Party Details** tab is where you will add the basic information about the party. The **Party Search/Information** screen defaults to the **Party Details** tab when accessed by clicking the *Add Party* button on the **Party Search/Information** screen. All fields on this tab are editable unless the party has been sent a General or Special Notice letter or is associated with an Enforcement action.

1. To access the Party Details, click on the **Party Details** tab or double-click on the Name, Facility Name, Address, City, ST, Zip, Country, Bradstreet #, or Type fields on the **Summary** tab.
2. Type in information in the appropriate field for the Party Name, Alias, Address, City, State, Zip Code, Phone Number, Fax Number, Facility Name, Internet Address, Country, Date and State in which the party was incorporated, if appropriate, and Dunn & Bradstreet number. The system only requires that you enter the Party Name. A 1999 OSRE memo, however, requires additional information be entered for the party, for example the Party Address. Entering the address will increase the usability of the data; help reduce the number of duplicate parties in the system; eliminate data quality issues; and allow you to create and print mailing labels. If a user selects a country from the Country dropdown box and picks something other than "United States", the "Phone", "Fax", and "Zip Code" will be replaced with "Int'l Phone", "Int'l Fax", and "Postal Code." The "State" field will be deactivated and the new International fields will lack the formatting of the US codes.

Party Information

3. Identify the party type using the drag and drop box. Multiple values are allowed.

The screenshot shows the 'Party Information' dialog box with the 'Party Details' tab selected. The 'Party Name' field is empty, and the 'Originating Region' is set to '01'. The 'Party Types' list on the left includes 'County/Parish Agency', 'Federal Agency', 'Financial Institution', and 'Individual'. The 'Selected Party Types' list is currently empty. The 'Country' dropdown is set to a blank state. Arrows point from text annotations to the address fields, the party type list, and the country dropdown.

Fields to enter party address information

Use these fields to indicate the party type

Use this dropdown box to identify the country for the party you are entering. If the Country field is blank, or is populated with "United States", the Phone, Fax, and Zip Code fields will appear.

The screenshot shows the 'Party Information' dialog box after the 'Country' dropdown has been set to 'UNITED KINGDOM'. The 'Country' field is highlighted in purple. The 'Selected Party Types' list remains empty. The 'Party Name' field is still empty, and the 'Originating Region' is '01'. The 'Party Types' list on the left is the same as in the previous screenshot. Arrows point from text annotations to the 'UNITED KINGDOM' dropdown and the 'Selected Party Types' list.

When the Country is selected and set to something other than Blank or "United States", the Phone, Fax, and Zip Code fields are replaced by "Intl Phone", "Intl Fax", and "Postal Code." The "State" field will be deactivated.

Party Information

Associated Sites Tab

The *Associated Sites* tab displays the sites at which the PRP is involved. This tab is used to associate a party to a number of sites or a site other than your “global” site without going back to the **Site List**. If you are associating parties with the “global” site, you don’t need to go to this tab. Just go back to the *Summary* tab to save your data and associate the party to the site.

1. To access the *Associated Sites* tab, double-click on the Sites field on the *Summary* tab, or click on the *Associated Sites* tab.
2. To see if a site has already been associated with the party, click in the Find field at the top of the ‘Sites Party is Already Associated With’ box. The closest alphabetical match will be displayed.
3. To search for a site with which you wish to associate the party, click in the Find field at the top of the ‘All Sites in Current Region’ field. The closest alphabetical match will be displayed.
4. To associate the party, highlight (click once) the desired site in the ‘Associate Party with Additional Sites’ field and click the *Associate* button. The *Involvement* tab is displayed.

Party Name: DUPONT Originating Region: 01

Summary Party Details **Associated Sites** Involvement Substance Enf. History Contacts Comments

Sites Party is Already Associated With: Find:

Site(s) Name	Region	State	Spill ID	County
THERMO-CHEM, INC.	05	MI	05W1	MUSKEGON

There are 1 site available.

Associate Party with Additional Sites: Find:

Site Name	State	Spill ID
#1 OLD SANITARY LANDFILL TILLMAN ROAD	IN	
#1 RAWME UNDER LAKE MONROE	IN	
#2 FELGER ROAD DUMP	IN	

There are 7595 sites available.

Associate OK Cancel

Annotations:

- Sites party is already associated with
- Other sites in the Region
- Find fields
- Click Associate to associate the party with the site you selected.

Party Information

The Involvement Tab

The *Involvement* tab allows the user to enter information on how the party is involved with the site.

1. To access the *Involvement* Tab, double-click on the Sites dropdown list on the *Summary* tab, click the *Associate* button on the *Associated Sites* tab, or click on the *Involvement* tab.
2. You are required to choose at least one Involvement Type. To select the Involvement Type, click in the appropriate box. A check mark will be displayed. If you choose "Other Involvement Type," the system requires you to select an "Other Involvement Type" from the drag and drop box on the right. To do this, highlight (click once) the desired "Other Involvement Type" on the left side of the screen and click the right arrow button or drag and drop the value into the Selected Types box. If you try to save your changes without indicating an "Other Involvement Type," a message will appear reminding you to select this field.

Check one of the Involvement Types

Type the beginning and ending involvement dates in these fields

Select an identification source from the dropdown list

Other Involvement Type drag and drop field

Financial Viability drag and drop box

Basis of Liability drag and drop box

3. Below the Involvement Types are three check boxes: Non-Settlor, Noticed/Enforcement Action and Not PRP Determination Made. The Noticed/ Enforcement Action box indicates that the party has been sent a general or special notice letter or has been associated with an enforcement instrument or litigation action. If you associate the party with a General or Special Notice Letter, Litigation action, or Enforcement Instrument, WasteLAN will automatically check the Noticed/Enforcement Action box.

NOTE: Users cannot uncheck the Noticed/Enf Action box after it has been system generated or has been saved. Parties where the Noticed/Enf Action box has been checked are snapshot to the national database and the other regions.

Party Information

- The Not PRP Determination Made checkbox indicates that determination has been made that the party is not a PRP. Similar to the Noticed/Enf Action checkbox, the Not PRP Determination Made checkbox can be manually entered or system generated. WasteLAN will automatically check in the Not PRP Determination Made box if you check “Other” as the only Involvement and select “Prospective Purchaser” as the only Other Involvement Type. If the checkbox is system generated, a message will pop up alerting you that the box has been checked. You can uncheck the Not PRP Determination Made box at anytime.

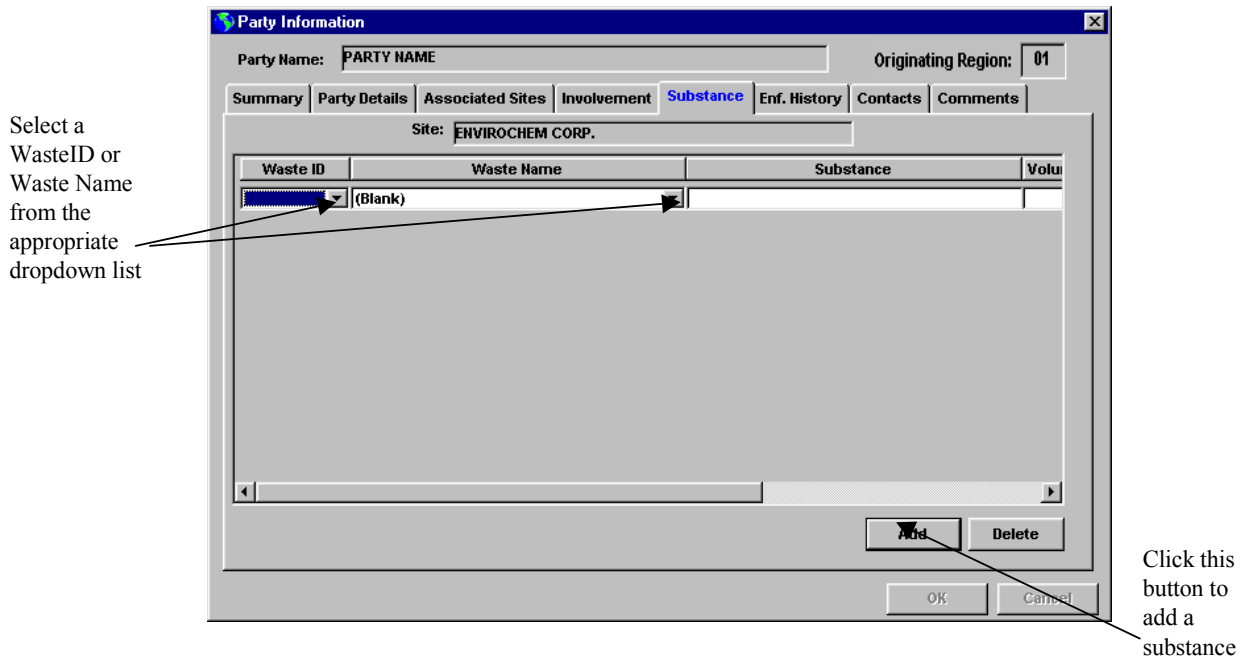
NOTE: Once a party has been snapshot it will always be available in the National database even if you later decide a party should not have received a notice letter or you make a determination that a party is not a PRP and check the Not PRP Determination Made checkbox.

- The **Involvement** tab also contains data fields to indicate the Basis of Liability and the Financial Viability of the party. These fields are drag and drop fields so that several selections may be made. To select a value in any of these drag and drop boxes, highlight the desired item in the ‘Financial Viability’ box or the ‘Basis of Liability’ box and click the right arrow button or drag and drop it from the left box to the right box.

The Substance Tab

The **Substance** tab allows you to associate the party with the wastes at a site.

- To access the **Substance tab** click on the **Substance** tab.
- To add a substance, click the **Add** button. You can enter a waste by selecting a Waste ID or Waste Name from the dropdown lists, or typing the substance name in the Substance Name field. If you select a Waste ID the system will display the Waste Name and vice versa.



Party Information

Using the Enforcement History Tab

The purpose of the *Enforcement History* tab is to enter confidential information on your enforcement experiences with a party.

1. To access the *Enf History* tab click on this tab.
2. The information on the top of the tab is automatically filled based on your User information. The arrow keys on the bottom right of the screen allow you to scroll through multiple entries. The History Records field shows how many entries there are for the party. The enforcement history is shared with all regions.
3. To enter comments on your experiences with the party, click in the Confidential Enforcement History field and begin typing.
4. To add a new record, click the *Add* button and enter the appropriate information. To delete an existing record, click the *Delete* button.

WasteLAN User information

Enter Enforcement History Information in this free form text field

Use scroll bars to scroll through records

Party Information

Contacts Tab

On the *Contacts* tab, you can enter information about people related to a party, for example, the party's attorney. The tab is the same as the Name List screen in WasteLAN. However, the only roles you will see are those related to a party. You must select a role for the contact by choosing one from the dropdown list.

1. To access the *Contacts* tab, double-click in the Contacts field on the *Summary* tab, or select the *Contacts* tab.
2. Enter the contact's name and address information and select a role. To see all the contacts for the party, use the arrows at the bottom of the screen.
3. To add a new contract click the *Add* button and enter the appropriate information. To delete an existing contact, click the *delete* button.

Use the scroll bars
to scroll through the
Contacts

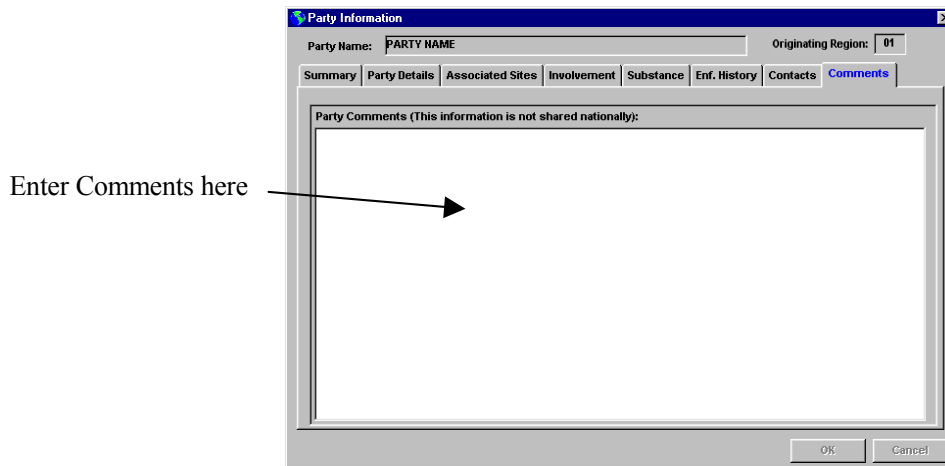
Click the Add or
Delete buttons to
add or delete a
Contact

Party Information

Comments Tab

The **Comments** tab allows you to enter comments about the party. The comments are not site specific and can only be viewed in your region. If you wish to make comments about a party that are specific to a site, you can do that on the **Involvement** tab.

1. To access the **Comments** tab click on the **Comments** tab.
2. To enter comments about the party click in the Party Comments field and begin typing.



Exiting the Party Information Screens

To exit the **Party Information** screens and save the site association and the information on the party, you must go back to the **Summary** tab. Clicking the **OK** button will bring up a message asking if you want to save your changes. Click **Yes** to save your changes and exit the **Party Information** screens.

CHECKLIST OF PRP SEARCH TASKS

NOTE: This checklist is intended as a tool, listing tasks which **may** be assigned or performed during PRP searches, depending on site enforcement strategy and needs. The list which follows does not imply that all tasks must or should be performed, and the sequence in which tasks are performed should be governed by site strategy rather than the order listed below.

Region: _____ Site Name: _____
 Location: _____

TASK

TASK SELECTION CRITERIA / CONDITIONS

1. Agency Record Collection and File Review

Gather and organize the information; review records to extract PRP information and leads

Files are:	File Location	# of Pages
<input type="checkbox"/> Federal		
<input type="checkbox"/> State		
<input type="checkbox"/> Local		
<input type="checkbox"/> Other		

Use this space to describe anything unique about the records and their condition including business confidential, contamination, travel involved, access, other sources besides hard copy, etc.

.....

2. Title Searches

Note: Recommend that title searches begin with the first industrial activity or use of the property. Alternatively, 50 years or the end of World War II may be used as a starting point for title history.

- A. Simple Title Search Site involves less than five parcels and the site does not have a long history of industrial use.
- B. Complex Title Search Site involves more than five parcels and/or has a long history of industrial use.
- C. Unknown Title Search A site property description will need to be developed by EPA, or EPA's enforcement contractor along with an estimate of the title search cost.
- D. Title Search for Recorded Instruments Includes deeds, leases, mortgages, liens, plate maps, contracts. Necessary to support site history and PRP list. If litigation is expected, certified copies (see next task) are usually required for admissibility.
- E. Certified Copies Includes deeds, leases, mortgages, liens, death records, wills, lawsuits and contracts. Obtain certified copies if litigation is expected and case attorney requires certified copies for court admissibility.
- F. Chain of Title A chronological list of title instruments for quick reference to title transactions over time.
- G. Property History Narrative Requested for more complex sites when a detailed narrative description of property history would assist case development.

Checklist for Tasking
Continued –

TASK	TASK SELECTION CRITERIA / CONDITIONS
3. <input type="checkbox"/> Interviews with Government Officials	Interviews required of persons known or suspected to possess unique information about the site. Interviews generally conducted by phone unless travel is specifically requested. This task is used in most PRP searches.
4. <input type="checkbox"/> Records Compilation	Records are located and manually organized to permit easy access and use. A file system and index are usually established. Depending on the number of records, records may be computerized.
5. <input type="checkbox"/> Compliance History	This task provides a narrative description of site compliance status for a specified period of interest focusing on activities and parties involved with hazardous wastes.
6. <input type="checkbox"/> PRP Status/PRP History	PRPs for which a current address is not available are researched to determine their fate. Names, addresses, and registered agents are provided for the PRPs and any successor companies.
7. <input type="checkbox"/> PRP Name and Address Update	Current name and address information is obtained for identified PRPs. Includes name, address, registered agent, mergers, and name changes.
8. <input type="checkbox"/> CERCLA 104 (e) Letters	EPA identifies PRPs and collects evidence by sending section 104(e) information request letters. The information gathered from 104(e) letters is critical to site history, status, chemical use, disposal, volume, and other information to determine liability.
9. <input type="checkbox"/> Financial Status	Solicit financial information through CERCLA 104(e) authority regarding the financial condition of the PRPs. This task can provide PRP information such as financial status, officers, and current business operations.
Develop financial information for: (Identify public vs. private companies, etc.)	
A. <input type="checkbox"/> Individual PRPs	Attach list of names and addresses
B. <input type="checkbox"/> Partnership	Attach list of names and addresses
C. <input type="checkbox"/> Corporation	Attach list of names and addresses
D. <input type="checkbox"/> Exempt Organizations	Attach list of names and addresses
E. <input type="checkbox"/> Other	Attach list of names and addresses
F. <input type="checkbox"/> CERCLA 104(e)/ RCRA 3007(c) Letters	This task includes formulating potential questions for PRPs based on gaps observed in available information, preparing letters with PRP names and addresses, and reviewing responses for information relevant to PRPs.
10. <input type="checkbox"/> History of Site Operations	<i>Note: This task may be more appropriately performed after issuance of information request 104(e) letters and the review of PRP files. A narrative description of site operations through a specified period of interest is presented in a report. This history focuses on activities and parties involved with hazardous wastes. Particularly useful if many operators or various types of operations were involved at the site.</i>

Checklist for Tasking
Continued –

TASK	TASK SELECTION CRITERIA / CONDITIONS
11. <input type="checkbox"/> Report Preparation	PRP reports should include sections on the site background, project approach, contracts and sources, site history, PRPs, and conclusions/recommendations.
12. <input type="checkbox"/> Aerial Photographs and Sanborn Maps	Aerial photographs and Sanborn maps can provide detailed site information without accessing the site. They can also be used to compare site characteristics over a period of time.
13. <input type="checkbox"/> CERCLA Subpoena Authority	Authority to serve administrative subpoenas to obtain evidence from PRPs and others. The subpoena is useful in situations when the PRP may not respond to the information request under 104(e) e.g., obtaining financial and account records from financial institutions.
14. <input type="checkbox"/> Field Survey	This task is used to gather additional evidence through field activities such as general field inspection, document review, personal interviews, and drum label recording. Usually conducted only when there is no other information available about a site.
15. <input type="checkbox"/> Industrial Survey	This task identifies PRPs through a survey of local businesses and a review of various industrial manuals and directories. This is an indirect method of identifying PRPs and may be difficult to prove if no other information is available. May serve as a starting point of more detailed research into disposal practices of local industries.
16. <input type="checkbox"/> PRP File Review	PRP documents, such as operator records, are reviewed to extract PRP information and leads. This task should be completed after a review of agency files.
<p>Use this space to describe anything unique about the records and their condition including business confidential, contamination, travel involved, access, other sources besides hard copy, etc.</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>	
17. <input type="checkbox"/> Private Citizen/PRP Interview	Interviews with persons known or suspected to possess unique information about the site. Interviews can be conducted via telephone, or in person at the discretion of the investigator and/or enforcement specialist. Detailed interviews, when needed, can be documented by a transcript.
18. <input type="checkbox"/> EPA Investigations	Investigations can be useful in locating individuals, developing information regarding closely held financial assets, and interviewing parties with knowledge of the site activities. If a potential for danger exists, contact appropriate law enforcement personnel, such as EPA CID special agents, building security, or local police.
19. <input type="checkbox"/> CERCLIS	CERCLIS is an EPA database which generally contains PRP information such as: name, addresses, types of letters sent (notice, demand and information request) and the dates sent, orders issued, and kind of PRP (owner, operator, generator, or transporter).

Checklist for Tasking
Continued –

TASK	TASK SELECTION CRITERIA / CONDITIONS
20. <input type="checkbox"/> Waste Stream Inventory	Compile an accurate inventory of wastes that were disposed of at the site by reviewing operating logbooks, analytical reports, and waste stream records.
21. <input type="checkbox"/> Process Chemistry Analysis	The process chemistry analysis task is generally performed after an industrial survey and a waste stream inventory. This task attempts to link industries with wastes at a site.
22. <input type="checkbox"/> Database(s)	
A. <input type="checkbox"/> Correspondence	A database is created to keep track of PRPs sent letters (Notice or Information), whether they responded, and other information as specified by EPA. Computerized databases should be considered for cases with a large number of PRPs.
B. <input type="checkbox"/> Inventory	Information management system developed to organize and permit quick retrieval of documents by key word, author, date, subject, or other predetermined strategy. Useful for searches with a large number of documents or if documents must be easily accessed.
C. <input type="checkbox"/> Transactional	Site transaction databases are used to rank PRPs based on quantified site usage information. (See also Generator Ranking)
23. <input type="checkbox"/> Financial Assessment	This task provides a more detailed analysis of a PRP's financial situation than the financial status task.
24. <input type="checkbox"/> Generator Ranking	This is usually a work product(printout) from a transactional database project (see #22 above). The ranking orders generators by waste volume or other comparable unit.
25. <input type="checkbox"/> Property Appraisal/Property Survey	Appraisal of site property owned by a PRP which may have value. Appraisal may focus on contaminated state or post-remedial state.

Please identify person completing this checklist:

Name: _____ Title: _____

Region/Other: _____ Phone Number: _____

Mailing Address: _____

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August 14, 2003

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**List of Regional Contacts
for the
PRP Search Enhancement Efforts**

August 14, 2003

Region	Regional Contact	Address
Region 1	James Israel (P) (617) 918-1270	U.S. EPA, Region 1 1 Congress Street Boston, MA 02203-2211
Alt.	Barbara O'Toole (P) (617) 918-1408	
Region 2	Carol Berns (P) (212) 637-3177 (F) (212) 637-3104	Office of Regional Counsel 290 Broadway - 17th Floor New York, New York 10007-1866
Region 3	Harry Steinmetz (P) (215) 814-3161 (F) (215) 814-3005	PRP Investigations & Site Information Section 650 Arch Street/3HS11 Philadelphia, PA 19103
Region 4	Herb Miller (P) (404) 562-8860 (F) (404) 562-8842	Cost Recovery Section Waste Management Division 61 Forsyth Street, S.W. Atlanta, GA 30303
Region 5	Thomas Marks (P) (312) 353-6591 (F) (312) 886-0753	Remedial Enforcement Support Section 77 West Jackson Blvd. (Mail Code SM-5J) Chicago, IL 60604
Region 6	Buddy Parr (P) (214) 665-6670 (F) (214) 665-6660	Cost Recovery Section Superfund Division 1445 Ross Avenue (Fountain Place) Dallas, TX 75202-2733
Alt.	Janice Bivens (214) 665-6717	
Region 7	Dianna Whitaker (P) (913) 551-7598 (F) (913) 551-7925	U.S. EPA, Region 7 CNSL/R7 901 North 5 th Street Kansas City, KS 66101
Region 8	David Broste (P) (303) 312-6209 Greg Phoebe (P) (303) 312-6466	Office of Enforcement, Compliance, and Environmental Justice 999 18th Street/8ENF-T Suite # 500 Denver, CO 80202-2466
Region 9	Cliff Davis (P) (415) 972-3125 (F) (415) 972-3520	Superfund Division 75 Hawthorne Street/SFD-7-B San Francisco, CA 94105
Region 10	Deborah Burgess (P) (206) 553-0459	1200 6th Avenue (MC: M/S ECL-110) Seattle, WA 98101

On-Line Sources of PRP Information

September 2003

Basic Internet Info and "How to Search" Articles

<http://www.matisse.net/files/glossary.html> (Glossary of Internet Terms)

<http://www.onlinemag.net/JulOL97/net7.html> (Internet Search Techniques and Strategies)

<http://www.onlinemag.net/OL1998/net9.html> (More Internet Search Strategies)

Search engines

<http://www.google.com>

<http://hotbot.lycos.com>

<http://www.altavista.com>

<http://www.alltheweb.com>

<http://www.startingpage.com/html/search.html>

Megasearch (search multiple search engines simultaneously)

<http://www.ProFusion.com>

<http://www.metacrawler.com>

<http://www.thebighub.com>

<http://www.dogpile.com>

Librarian's Index to the Internet

<http://lii.org>

Netcraft Web Site Finder

<http://www.netcraft.com>

Who is Database Search (gives info on computer identities)

<http://www.arin.net/whois/arinwhois.html>

Directories of Directories

<http://search.netscape.com>

http://search.netscape.com/nscp_browse.adp?id=10 (Reference/Directories)

http://search.netscape.com/nscp_browse.adp?id=57186 (Investigation/Records Research)

Scan millions of listings by name or e-mail address

<http://people.yahoo.com>

<http://www.bigfoot.com>

<http://www.whowhere.com>

Find someone on the Internet

<http://my.email.address.is>

<http://www.startingpage.com/html/lookup.html> (Directory of Databases)

E-Mail address searching FAQ

<http://www.qucis.queensu.ca/FAQs/email/bigfinding.html>

AT&T Nationwide Toll-Free 800/888 Directory.

<http://www.tollfree.att.net/tf.html>

Reverse Telephone Look-ups

<http://www.infospace.com/info/revphone.htm>

<http://www.reversephonedirectory.com>

<http://www.anywho.com/rl.html>

Telephone Directories

<http://www.switchboard.com>
<http://www.teldir.com/eng/namc/us> (Multiple Directories)
<http://www.whowhere.lycos.com/Phone>

Find people and businesses

<http://www.startingpage.com/html/lookup.html>
<http://yp10.superpages.com>

Find companies

<http://www.freeality.com/findc.htm>
<http://www.startingpage.com/html/business.html>

ZIP code lookup

http://www.usps.gov/ncsc/lookups/lookup_ctystzip.html
http://www.usps.gov/ncsc/lookups/lookup_zip+4.html
(for local post office telephone number 800-275-8777 option #4)

Find people who have recently moved by e-mail, domain name, address or name

<http://www.semaphorecorp.com/default.html>

Maps

<http://www.mapquest.com>
<http://MapsOnUs.com>
<http://www.geographynetwork.com/maps/index.html>
<http://www.nationalatlas.gov/mapit.html>
<http://www.epa.gov/enviro/html/mod/mod.html> (EPA maps)
<http://www.freeality.com/maps.htm> (Find map sites)

Scan the Social Security Death Index for the potentially dearly departed

<http://www.ancestry.com/search/rectype/vital/ssdi/main.htm>

EPA/Environment

<http://es.epa.gov/oeca/main/compasst/compcenters.html> (EPA Compliance Assistance)
<http://www.ert.org> (EPA Environmental Response Team)
<http://es.epa.gov/oeca/osre> (EPA Office of Site Remediation Enforcement)
<http://www.epa.gov/OCEPAterms> (EPA OCEPA Terms and Acronyms)
<http://www2.ihsenv.com> (Environmental Information - ENFLEX EH&S Database)
http://www.rachel.org/home_eng.htm (News and resources for environmental justice)
<http://www.clu-in.org> (Hazardous Waste Clean-up Information - CLU-IN)
<http://www.trainex.org> (EPA Training-Exchange)
<http://es.epa.gov/oeca/oceft/neti.html> (National Enforcement Training Institute)
<http://www.achmm.org> (Academy of Certified Hazardous Materials Managers)
<http://www.epsilonssystems.com> (Epsilon Solutions training)

Internal EPA

<http://intranet.epa.gov/institute> (EPA Institute)
<http://intranet.epa.gov/fmdvally/policies/policies.htm> (EPA Policy Announcements)
<http://intranet.epa.gov/oeca/osre> (EPA Site Remediation Enforcement InfoBase)
<http://intranet.epa.gov/oerrinet> (EPA OERR Superfund/Oil InTRAnet site)

Business Sites

<http://www.startingpage.com/html/business.html> (Directories)
<http://www.wsj.com> (Wall Street Journal)
<http://www.thestreet.com>
<http://money.netscape.cnn.com/money> (Money & Business from CNN Money)
<http://localbusiness.com>
<http://netbusiness.netscape.com>
<http://www.fool.com> (Motley Fool)
<http://www.osha.gov/cgi-bin/est/est1> (Search OSHA Inspections)

<http://www.cis.org/search.html> (Search for Employers employing illegal aliens)
<http://www.hoovers.com> (Hoovers Company profiles)
<http://www.qspace.com> (Credit Reports Online)
<http://www.thomasregister.com> (Search ThomasRegister)
<http://www.taxprophet.com> (California Certified Taxation Law Specialist)
<http://www.sec.gov/edgarhp.htm> (Search SEC Filings - EDGAR)

Law

<http://www.lawguru.com/search/lawsearch.html>
(search on more than 535 legal search engines)
<http://uscode.house.gov/usc.htm> (Search U.S. Code)
<http://www.arnet.gov/far> (Federal Acquisition Regulation)
<http://www.law.indiana.edu/v-lib/index.html> (Virtual Library-Law)
<http://supct.law.cornell.edu/supct/index.html> (Published Supreme Court opinions)
<http://www.martindale.com>
(find lawyer by name, location, practice, firm, agency, school, etc.)
<http://directory.findlaw.com> (Lawyer Directory)

Libraries and Public Information

<http://lcweb.loc.gov> (Visit the Library of Congress online)
<http://www.nhtsa.dot.gov/cars/problems/complain/Index.cfm> (Search NHTSA)
<http://www.infoplease.com/index.html> (Almanacs and more)
<http://www.newspapers.com> (Locate Local Newspapers)

Bankruptcy

<http://www.abiworld.org> (American Bankruptcy Institute)
<http://home.att.net/~jshabib> (Bankruptcy Code in Windows Help File format)

Law Enforcement

http://www.fas.org/irp/gao/osi-97-2/soi_ch4.htm (GAO Investigators Guide to Info.)
<http://www.ojp.usdoj.gov/bjs/welcome.html> (Bureau of Justice Statistics)
<http://virlib.ncjrs.org/LawEnforcement.asp> (National Criminal Justice Reference Service)
<http://www.iir.com/riss> (DOJ's Regional Information Sharing Systems)
<http://www.ncjrs.org> (National Criminal Justice Reference Service w/ abstracts)
<http://www.coplink.com>
<http://www.copnet.org>

Directories of Government Sites

<http://firstgov.gov> (first click to the U.S. Government)
<http://www.tray.com/fecinfo> (Federal Election Commission political donations information)
<http://www.visi.com/juan/congress> (Find your congressperson)
<http://www.statelocalgov.net/index.cfm> (State and Local Government on the Net)
<http://www.genealogy.com/00000229.html> (Locate County Courthouses)
<http://tracfed.syr.edu> (Information about the federal government)

Time.com News Service

<http://www.time.com/time>

General Travel Information

<http://intranet.epa.gov/ocfo/finservices/tmcfaq.htm>
<http://www.fedtravel.com/gsa/Default.asp>
<http://home.netscape.com/travel>
<http://flight.thetrip.com>

Per Diem Rates

<http://www.policyworks.gov/org/main/mt/homepage/mtt/perdiem/travel.shtml>

Stock Quotes

<http://finance.yahoo.com>

Mortgages and Loans

<http://www.priceline.com>

<http://www.bestrates.com>

<http://www.quicken.com>



U.S. Environmental Protection Agency

Office of Enforcement and Compliance Assurance

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Close Window

Superfund Enforcement Directory (SFED)


Intro to SFED

One of the central functions of the PRP Search Enhancement Team is to encourage and support the sharing of information and coordination of activities among various EPA organizations that are involved in the site remediation enforcement process. Because people with experience and expertise in topics relevant to site remediation enforcement are spread throughout EPA Headquarters and the Regions, it is often difficult to know who to contact for information about a particular subject. The purpose of the SFED is to provide a single resource that identifies EPA personnel who are involved in the site remediation enforcement process and their particular areas of expertise. They may also function in other roles not reflected in the Enforcement Directory, and may have formal job titles not directly related to site remediation enforcement.

SEARCHING THE DIRECTORY

The Enforcement Directory is a searchable contact list of EPA professionals who are involved in the site remediation enforcement process. The SFED enables you to search for EPA personnel by name, Region, PRP search enforcement subject, or PRP search enforcement title.

The search page is divided into sections by search method. On the left sidebar, there are two options, a "Submit" option and a "Reset" option. The "Submit" option executes a search using the values entered in the search fields. The "Reset" option clears existing search values and allows you to enter new information.

 **Help icon:** This icon, located on the search page, provides quick search tips. Place the mouse over the icon to display the search information in a pop-up box.

Search by name: The "Search by name" search method enables you to search for a person using all or part of either their first or last name. To search by name, enter a complete or partial first and/or last name in the fields then click on the "Submit" option on the sidebar or the "Submit" button at the bottom of the page. All personnel matching the search values provided will be displayed.

Search by Region: The "Search by Region" search method provides you with a complete list of EPA personnel by Region. To search by Region, select one or more Regions from the scrollable menu. (To select multiple Regions, hold your Shift key to select a range of Regions or hold your Ctrl key to select individual Regions). When you have selected the Region(s), click on the right arrow button to enter the selected Region(s) in the selection box. (To remove a Region from the selection box, select the Region to be removed then click on the left arrow). To execute the search, click on the "Submit" option on the sidebar or on the "Submit" button at the bottom of the page. All personnel for the selected Region(s) will be displayed.

Search by PRP search enforcement subject: The "Search by PRP search enforcement subject" search method enables you to find personnel with knowledge/expertise in a particular subject area. To search by enforcement subject, select one or more subjects from the scrollable menu. (To select multiple subjects, hold your Shift key to select a range of subjects or hold your Ctrl key to select individual subjects). When you have selected the subject area(s), click on the down arrow to move the subjects to the selection box. (To remove a subject area from the selection box, select the subject to be removed then click on the up arrow). To execute the search, click on the "Submit" option on the sidebar or on the "Submit" button at the bottom of the page. All personnel with knowledge/expertise in the selected subject area(s) will be displayed. If you are unable to locate the subject you are searching for in the scrollable subject menu, you may locate it in the titles menu.

Search by PRP search enforcement title: The "Search by PRP search enforcement title" search method enables you to search for personnel by job title. To search by title, select one or more titles from the scrollable menu. (To select multiple titles, hold your Shift key to select a range of titles or hold your Ctrl key to select individual titles). When you have selected the title(s), click on the down arrow to move the titles to the selection box. (To remove a title from the selection box, select the title to be removed then click on the up arrow). To execute the search, click on the "Submit" option on the sidebar or on the "Submit" button at the bottom of the page. All personnel currently holding the selected title(s) will be displayed.

Sort Tips:

Your search results can be sorted in a variety of ways from the Main Page:

To sort contacts alphabetically by last name, click on the Name and Address heading. To find a specific contact, click the first letter of the contact's last name on the alphabet bar at the top of the screen. The sort will then start with that letter.

To sort contacts numerically by Region/HQ, click on the Region heading. To find a specific Region, click the Region number on the numerical bar at the top of the screen. The sort will then start with that Region.

To sort contacts by subject, click on the Subject heading. The contacts will be sorted numerically by Region, and alphabetically by subject within each Region

Printing:

To print the entire report once it is generated, click on the "Print List" option located on the left sidebar. To print the report page by page, click on the printer icon at the top of the screen. To return to the Main Page after printing, click on the browser "Back" button.

Email List:

To generate a list of email addresses for selected contacts, click on the "Email List" option on the left sidebar. Once the list has been generated, highlight the email addresses, place your cursor over the highlighted text, right click and choose "Copy", open your email program, and start a new message. Place the cursor in the "To:" field, right click, and choose "Paste."

Mailing Labels:

For mailing labels instructions, click the link above.

If you have any questions or comments regarding the Enforcement Directory please contact Nancy Deck at deck.nancy@epa.gov.

For a more complete guide to SFED, select the "User's Manual" option from the left sidebar of the Main Page.

Note: At this time SFED includes primarily EPA personnel. The directory will be expanded in the near future to include State, tribal, and other organizations that are involved in the site remediation or PRP search enforcement process.

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[EPA Home](#) > [Compliance and Enforcement](#) > [Cleanup Enforcement](#) > [Superfund](#) > Superfund Enforcement Directory

Submit
Reset

Intro to SFED
User's Manual

Superfund Enforcement Directory

To search the directory, select one or more search criteria (Name, Region, Subject, or Title) and provide values to search for in the fields or select from the drop-down menus. Click on the "Submit" option in the sidebar or the "Submit" button at the bottom of the page to execute the search. To clear all fields, click on the "Reset" option on the sidebar.

Note: When selecting multiple subjects or multiple titles, the search returns all records containing any of the selected subjects or titles.

PRP Search Enforcement Name	
First Name <input type="text"/>	Last Name <input type="text"/>
Region	
Select from <input type="text"/>	Selected <input type="text"/>
<input type="button" value="v"/> <input type="button" value="A"/>	
PRP Search Enforcement Subject	
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Select from <input type="text"/>	
<input type="text"/> Assistant General Counsel Assistant Regional Administrator Associate Director for Management Branch Chief	
<input type="button" value="v"/> <input type="button" value="A"/>	
Select from <input type="text"/>	
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<input type="button" value="Submit"/>	



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[Contact us](#) [Print Version](#)

[EPA Home](#) > [Compliance and Enforcement](#) > [Cleanup Enforcement](#) > [Superfund](#) > Superfund Enforcement Directory

Superfund Enforcement Directory

Sort by Region

1 2 3 4 5 6 7 8 9 10 HQ

Name & Address	Phone / Email	Title	Region	Affiliate	Subject
Balzano, Kristin Mailcode SES, USEPA Region 1 1 Congress Street, Suite 1100 Boston, MA 02144-2023	(617) 918-1772 balzano.kristin@epa.gov	Enforcement Specialist (Paralegal)	01		<ul style="list-style-type: none"> Liens Negotiation/Litigation Support
Beland, Pat Mailcode HIO, USEPA Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023	(617) 918-1205 beland.pat@epa.gov		01		<ul style="list-style-type: none"> Information Management
Beling, John Mailcode SES, USEPA, Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023	(617) 918-1712 beling.john@epa.gov	Regional Counsel	01		<ul style="list-style-type: none"> 104e Access Administrative Subpoenas Insurance Issues
Bosworth, Martha Mailcode HBS, USEPA Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023	(617) 918-1407 bosworth.martha@epa.gov		01		<ul style="list-style-type: none"> Cost Documentation Cost Recovery Electronic Data Management/EARS Workgroup National PRP Search Conference Participant Negotiation/Litigation Support Oversight Billing Oversight Costs Statute of Limitations Work Performed Documents
Boudrot, Diane (Nye) Mailcode SES, USEPA Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023	(617) 918-1776 boudrot.diane@epa.gov	Enforcement Specialist (Paralegal)	01		<ul style="list-style-type: none"> 104e Information Requests Bankruptcy Comfort Letters Negotiation/Litigation Support Notice Letters
Brill, Larry Mailcode HBO, USEPA Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023	(617) 918-1301 brill.larry@epa.gov	Branch Chief (Superfund/ Remediation and Restoration I Branch)	01		<ul style="list-style-type: none"> SF-Remedial Branch Chiefs Mail-out List
Callahan, Pauline Mailcode MHR, USEPA, Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023	(617) 918-1192 callahan.pauline@epa.gov	Training Coordinator	01		<ul style="list-style-type: none"> Training CERCLA/RCA
Catri, Cindy Mailcode SES, USEPA, Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023	(617) 918-1888 catri.cindy@epa.gov	Regional Counsel	01		<ul style="list-style-type: none"> Applicable or Relevant and Appropriate Requirements Remedy Review Board
Cavagnero, Richard A. Mailcode HIO, USEPA Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023	(617) 918-1202 cavagnero.rich@epa.gov	Deputy Director (Superfund)	01		
Chin, Stanley Mailcode HBS, USEPA Region 1 1 Congress Street, Suite 1100 Boston, MA 02114-2023	617.918.1401 chin.stanley@epa.gov	Branch Chief (Technical & Support Branch)	01		<ul style="list-style-type: none"> SF-Remedial Branch Chiefs Mail-out List

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This page design was last updated on Thursday, March 20, 2003.

A total of 648 record(s) were found. (1-10)

Previous Next
First Last

Subjects & Titles
View All Records
Search
Print List

Label Instructions
Mailing Labels
Email List

Intro to SFED
User's Manual
Contact us



Close Window

Superfund Enforcement Directory

Superfund Enforcement Directory Contacts

The regional and HQ contacts who will be updating the directory are listed below. For any additions or corrections to the database please contact the following persons:

Region	Name	Email
01	Barbara O'Toole	otoole.barbara@epa.gov
01	James Israel	israel.james@epa.gov
02	Carol Berns	berns.carol@epa.gov
02	Lucille Gould	gould.lucille@epa.gov
03	Harry Steinmetz	steinmetz.harry@epa.gov
03	Louise Wilson	wilson.louise@epa.gov
04	Herb Miller	miller.herbert@epa.gov
05	Marsha Adams	adams.marsha@epa.gov
06	Janice Bivens	bivens.janice@epa.gov
07	Dianna Whitaker	whitaker.dianna@epa.gov
08	Greg Phoebe	phoebe.gregory@epa.gov
09	Leslie Owyang_Chin	owyang-chin.leslie@epa.gov
10	Deborah Burgess	burgess.deborah@epa.gov
HQ	Nancy Deck	deck.nancy@epa.gov

This directory was developed by the PRP Search Enhancement Team/Contacts consisting of the following people:

Region	Name	Email
01	Barbara O'Toole	otoole.barbara@epa.gov
01	James Israel	israel.james@epa.gov
02	Carol Berns	berns.carol@epa.gov
03	Harry Steinmetz	steinmetz.harry@epa.gov
04	Herb Miller	miller.herbert@epa.gov
05	Thomas Marks	marks.thomas@epa.gov
05	Douglas Ballotti	ballotti.douglas@epa.gov
06	Buddy Parr	parr.buddy@epa.gov
06	Janice Bivens	bivens.janice@epa.gov
07	Dianna Whitaker	whitaker.dianna@epa.gov
07	Cheryle Micinski	micinski.cheryle@epa.gov
08	Gregory Phoebe	phoebe.gregory@epa.gov
08	David Broste	broste.david@epa.gov
09	Clifford Davis	davis.clifford@epa.gov
10	Deborah Burgess	burgess.deborah@epa.gov
HQ	Clarence Featherson	featherson.clarence@epa.gov
HQ	Nancy Deck	deck.nancy@epa.gov
HQ	Lisa Blum	blum.lisa@epa.gov
HQ	Monica Gardner	gardner.monica@epa.gov



Financial Statement for Individuals *

(If additional space is needed, attach a separate sheet)

1. Your name and address (including zipcode and county)		2. Home phone number	3. Marital status
Zip Code	County	4. Social Security Numbers (optional)	a. Yours b. Spouse

Section I Employment Information

5. Present employer or business (name and address)		6. Business phone number	7. Occupation
5a. How long at present employment.			8. Check appropriate box <input type="checkbox"/> Wage earner <input type="checkbox"/> Partner <input type="checkbox"/> Sole proprietor <input type="checkbox"/> Corporate officer
9. Spouse's employer or business (name and address)		10. Business phone number	11. Occupation
9a. How long at present employment.			12. Check appropriate box <input type="checkbox"/> Wage earner <input type="checkbox"/> Partner <input type="checkbox"/> Sole proprietor <input type="checkbox"/> Corporate officer

Section II. Personal Information

13. Name, address and telephone number of next of kin or other reference

14. Date of birth	a. Yours	b. Spouse's	
-------------------	----------	-------------	--

Section III. General Financial Information

15. Last three years Federal and state income tax returns filed	15a. Adjusted gross income on returns, per year	15b. List all states these returns were filed in:
---	---	---

16. Bank accounts (include Savings & Loans, Credit Unions, IRA and Retirement Plans, Certificates of Deposit, etc.)

Name of Institution	Address	Type of Account	Account No.	Balance

Total (Enter in Item 25) ▶

* This information is requested pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9604, and is not subject to approval of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Section III - continued

General Financial Information

17. Charge cards, Lines of credit

Type of Account or Card	Name and Address of Financial Institution	Monthly Payment	Credit Limit	Amount Owed	Credit Available
Totals (Enter in Item 31)		▶			

18. Safe deposit boxes rented or accessed (List all locations, box numbers, and contents including estimated market value)

19. Real Property (Brief description of property and type of ownership)	Address (Include county, state and parcel number)
a.	
b.	
c.	

20. Insurance Policies (Name of Company)	Policy Number	Type	Face Amount	Available Loan Value
Total (Enter in Item 27)				▶

21. Additional Financial Information (Court and administrative proceedings by or against you, legal claims[whether asserted or not], settlement agreements, employment agreements, consulting and similar agreements, "golden parachute" agreements, bankruptcies, repossessions, recent transfers of assets for less than full value, anticipated increases in income, real estate being purchased under contract, real or personal property being held on your behalf, condition of health, information on trusts, estates, profit-sharing plans, inheritance, etc., in or of which you are a participant or beneficiary).

22. Are you currently receiving retirement benefits as a former civilian or military employee of the federal government? If so, give dates of service, agency or branch of service employed by, and location of employment.

23. Indicate any business entity with which you own five (5) percent or more of the outstanding stock (or other equity interest).

Name of Business Entity	Address	Percentage of Stock	Date Purchased

Section IV.

Asset and Liability Analysis

Description	Current Market Value	Liabilities Balance Due	Equity in Asset	Amount of Monthly Payment	Name and Address of Issuer or Lien/Note Holder/Obligee	Date Pledged	Date of Final Payment
24. Cash and precious metals or gems							
25. Bank accounts							
26 a. Stocks							
b. Bonds							
c. Mutual Funds, Partnership Interest, Securities and other Investments							
27. Cash or loan value of Insurance.							
28. Vehicles (Model, year, license)							
a.							
b.							
c.							
29. Real property (From item 19)							
a.							
b.							
c.							
30. Other tangible assets (including art, boats, jewelry, options, etc.) or financial debts owed to you in excess of \$1000.							
a.							
b.							
c.							
d.							
31. Bank revolving credit							
32. Other Liabilities (Include judgements, notes, tax liens, etc.)							
a.							
b.							
c.							
d.							
e.							
f.							
g.							
33. Federal and state Taxes Owed							
34. Totals			\$	\$	Enter in item 49		

List all transfers real & personal property, including cash (by gift or loan made not at fair market terms) that you have made within the last 3 years (items with a current market value of \$1000.00 or more):

Date	Current Market Value	Sale Price You Received (if any)	Description of Property Transferred	To Whom (Indicate relationship to you)	Nature and Conditions of Transfer

Section V.

Monthly Income and Expense Analysis

Income			Necessary Living Expenses	
Source	Gross	Net		
35. Wages/Salaries	\$	\$	47. Rent (Do not show mortgage listed in item 29)	\$
36. Wages/Salaries (<i>spouse</i>)			48. Groceries (no. of people ____)	
37. Sales Commissions			49. Installment payments	
38. Interest - Dividends			50. Utilities (Gas \$ _____ Water \$ _____	
39. Net business income			Electric \$ _____ Phone \$ _____)	
40. Rental income			51. Transportation	
41. Pension/Social Security income			52. Insurance (Life \$ _____ Health \$ _____	
42. Pension/Social Security income (<i>spouse</i>)			Home \$ _____ Car \$ _____)	
43. Child Support			53. Medical (<i>describe if in excess of \$500.00</i>)	
44. Alimony			54. Estimated tax payments (<i>if self-employed</i>)	
45. Other Income (<i>e.g. investment income, capital gains</i>)			55. Other expenses (<i>specify</i>)	
46. Total	\$	\$	56. Total	\$

Certification

Under penalties of perjury, I declare that to the best of my knowledge and belief this statement of assets, liabilities, and other information is true, correct, and complete.

57. Your signature		58. Date
--------------------	--	----------



U.S. Environmental Protection Agency, Region IX
Financial Statement for Businesses *

(If additional space is needed, attach a separate sheet)

1. Your name and address <i>(including zipcode and county)</i>	1a. Business name and address <i>(including zipcode and county)</i>	2. Business phone number ()	4. (Check appropriate box) <input type="checkbox"/> Sole proprietor <input type="checkbox"/> Trust <input type="checkbox"/> Partnership <input type="checkbox"/> Other (specify) _____ <input type="checkbox"/> Corporation _____
3. Name and address of registered agent <i>(including zipcode and county)</i>			
5. State of Incorporation (or country if foreign)	5a. Employer Identification Number	6. Date of Incorporation	7a. Type of business 7b. SIC Code

8. Information about owner, partners, officers, directors, major shareholder (5% or more stock ownership), other holders of more than 5% equity interest, holders of rights to purchase more than equity interest and other persons with an ability to control.

Name and Title	Effective Date	Home Address	Social Security Number (optional)	Phone Number	Total Shares or Interest

Section I General Financial Information

9. Last three years Federal and state income tax returns	Forms Filed	Tax Years ended	Net income before taxes
--	-------------	-----------------	-------------------------

10. Bank accounts *(List all types of accounts including checking, savings, certificates of deposit, etc.)*

Name of Institution	Address	Type of Account	Account No.	Balance
Total (Enter in Item 19)				

11. Bank Credit available *(Lines of credit, etc.)*

Name of Institution	Address	Credit Limit	Amount Owed	Credit Available	Monthly
Totals					

12. Location, box number, and contents of all safe deposit boxes rented or accessed

* This information is requested pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9604, and is not subject to approval of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Section III - continued

General Financial Information on Trust

15. Charge cards, Lines of credit

Type of Account or Card	Name and Address of Financial Institution	Monthly Payment	Credit Limit	Amount Owed	Credit Available
Totals (Enter in Item 28)					

16. Safe deposit boxes rented or accessed (List all locations, box numbers, and contents including estimated market value)

17. Real Property (Brief description of property and type of ownership)	Address (Include county, state and parcel number)
a.	
b.	
c.	

18. Insurance Policies (Name of Company)	Policy Number	Type	Face Amount	Available Loan Value
Total (Enter in Item 24)				

19. Additional Financial Information (Court and administrative proceedings by or against the Trust, legal claims[whether asserted or not], settlement agreements, employment agreements, consulting and similar agreements, "golden parachute" agreements, bankruptcies, repossessions, recent transfers of assets for less than full value, anticipated increases in income, real estate being purchased under contract, real or personal property being held on behalf of the Trust, condition of health, information on trusts, estates, profit-sharing plans, inheritance, etc., in or of which the Trust is a participant or beneficiary).

20. Indicate any business entity in which the Trust owns five (5) percent or more of the outstanding stock (or other equity interest).

Name of Business Entity	Address	Percentage of Stock	Date Purchased

Section IV.

Asset and Liability Analysis

Description	Current Market Value	Liabilities Balance Due	Equity in Asset	Amount of Monthly Payment	Name and Address of Issuer or Lien/Note Holder/Obligee	Date Pledged	Date of Final Payment
21. Cash and precious metals or gems							
22. Bank accounts							
23 a. Stocks							
b. Bonds							
c. Mutual Funds, Partnership Interest, Securities and other Investments							
24. Cash or loan value of Insurance.							
25. Vehicles (Model, year, license)							
a.							
b.							
c.							
26. Real property (From item 17)							
a.							
b.							
c.							
27. Other tangible assets (including art, boats, jewelry, options, etc.) or financial debts owed to the Trust in excess of \$1000.							
a.							
b.							
c.							
d.							
28. Bank revolving credit							
29. Other Liabilities (Include judgements, notes, tax liens, etc.)							
a.							
b.							
c.							
d.							
e.							
f.							
g.							
30. Federal and state Taxes Owed							
31. Totals			\$	\$	Enter in item 39		

List all transfers real & personal property, including cash (by gift or loan made not at fair market terms) to or from the Trust within the last 3 years (items with a current market value of \$1000.00 or more):

Date	Current Market Value	Sale Price Trust Received (if any)	Description of Property Transferred	To Whom (Indicate relationship to the Trust)	Nature and Conditions of Transfer

Section V.

Monthly Income and Expense Analysis of Trust Fund

Income			Necessary Expenses	
Source	Gross	Net		
32. Interest - Dividends	\$	\$	37. Trustee service fees	\$
33. Net business income			38. Rent (Do not show mortgage listed in item 26)	
34. Rental income			39. Installment payments	
35. Other Income (e.g. investment income, capital gains -- specify type)			40. Utilities (Gas \$ _____ Water \$ _____	
			Electric \$ _____ Phone \$ _____)	
			41. Transportation	
			42. Insurance (specify type)	
			43. Other expenses (specify)	
36. Total	\$	\$	44. Total	\$

Certification

Under penalties of perjury, I declare that to the best of my knowledge and belief this statement of assets, liabilities, and other information is true, correct, and complete.

45. Your signature	46. Date
--------------------	----------

Section I - continued

General Financial Information

13. Real property

Brief Description and Type of Ownership	Address (include county, state and parcel number)
a.	
b.	
c.	

14. Insurance policies owned with business as beneficiary

Name Insured	Company	Policy Number	Type	Face Amount	Available Loan Value
				Total (Enter in Item 21)	

15. Additional Information (Court and administrative proceedings by or against the business, settlement agreements, agreements to purchase or sell tangible or financial assets other than in the ordinary course of business, legal claims [whether asserted or not], bankruptcies, repossessions, recent transfers of assets for less than full value, anticipated increases in income, options to buy or sell real or personal property, real or personal property being purchased under contract, real or personal property being held on behalf of the business).

15a. List all subsidiaries owned, joint ventures, partnerships and other entities controlled by the business. Provide current market value of the business' interest in such subsidiary or other entity.

16. Federal government departments or agencies with whom you have a contract for payment of goods or services

Agency Name	Address	Contract No.	Amount to be Received	Payment Due Date

16a. Federal government departments or agencies that have extended or given the business loans, grants or assistance, or to which you have applied (or anticipate applying for any loan, grant, or assistance) in the past 5 years.

17. Accounts/Notes receivable (Include loans to stockholders, officers, partners, etc.)

Agency Name	Address	Amount Due	Due Date	Status
		Total (Enter in Item 20)		

Section II.

Asset and Liability Analysis

Description (a)	Cur. Mkt Value (b)	Liabilities Bal. Due (c)	Equity in Asset (d)	Amount of Mo. Pymt. (e)	Name and Address of Lien/Note Holder/Obligee (f)	Date Pledged (g)	Date of Final Pymt. (h)
18. Cash on hand							
19. Bank accounts							
19a. Securities and other financial assets owned							
20. Accounts/Notes receivable							
21. Insurance Loan Value							
22. Real property (from item 13)		a.					
		b.					
		c.					
		d.					
23. Vehicles (Model, year, license)		a.					
		b.					
		c.					
24. Machinery and equipment (Specify)		a.					
		b.					
		c.					
25. Merchandise inventory (Specify)		a.					
		b.					
26. Other Assets (including permits, licenses, tax loss carry forwards, agreements not to compete, other contracts) (Specify)		a.					
		b.					
		c.					
		d.					
27. Other Liabilities (Include judgements, notes, tax liens, etc.)		a.					
		b.					
		c.					
		d.					
		e.					
28. Federal & State Taxes Owed							
29. Totals							

Acronyms and Abbreviations

A

AA	Assistant Administrator
AAG	Assistant Attorney General
ACL	Alternate Concentration Limit
ADR	Alternative Dispute Resolution
AM	Action Memorandum
AO	Administrative Order
AOA	Advice of Allowance
AOC	Administrative Order on Consent
AOC	Area of Contamination
AR	Administrative Record
ARARs	Applicable or Relevant and Appropriate Requirements
ARCS	Alternative Remedial Contracts Strategy
ASTSWMO	Association of State and Tribal Solid Waste Management Organizations
ATP	Ability to Pay

B

BFPP	Bona Fide Prospective Purchaser
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
BPA	Blanket Purchase Agreement
BRAC	Base Realignment and Closure
BUREC	Bureau of Reclamation

C

CA	Cooperative Agreement
CAA	Clean Air Act
CAG	Community Advisory Group
CBI	Confidential Business Information
CD	Consent Decree
CD-ROM	Compact Disk Read-Only Memory
CEC	CERCLA Education Center (OSWER)
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CFR	Code of Federal Regulations
CI	Civil Investigator
CIC	Community Involvement Coordinator
CLP	Contract Laboratory Program
CO	Contracting Officer
COI	Conflict of Interest
COR	Contracting Officer's Representative
CR	Community Relations
CR	Cost Recovery
CRC	Community Relations Coordinator
CRC	Cost Recovery Coordinator
CRP	Community Relations Plan
CWA	Clean Water Act

D

DA	Deputy Administrator
DAA	Deputy Assistant Administrator
D&B	Dunn and Bradstreet
DCN	Document Control Number
DD	Division Director
DFO	Designated Federal Official
DOD	Deputy Office Director
DoD	Department of Defense
DOE	Department of Energy
DOI	Department of Interior
DOJ	Department of Justice
DOT	Department of Transportation
DPO	Deputy Project Officer
DQO	Data Quality Objective

E

EDGAR	Electronic Data Gathering, Analysis, and Retrieval
EE/CA	Engineering Evaluation/Cost Analysis
EJ	Environmental Justice
EMSL	Environmental Monitoring and Systems Laboratory
ENRD	Environment and Natural Resources Division (DOJ)
EPA	Environmental Protection Agency
EPAAR	EPA Acquisition Regulation (Manual)
EPCRA	Emergency Planning and Community Right-To-Know Act of 1986
EPIC	Environmental Photographic and Investigation Center
EPM	Enforcement Project Manager
EPS	Environmental Protection Specialist
ERCS	Emergency Response Cleanup Services
ERNS	Emergency Response Notification System
ERS	Environmental Response Services
ERT	Environmental Response Team
ESAT	Emergency Services Assistance Team
ESD	Environmental Services Division
ESD	Explanation of Significant Differences
ESI	Expanded Site Investigation
ESS	Enforcement Support Services

F

FACA	Federal Advisory Committee Act
FAR	Federal Acquisition Regulation
FEMA	Federal Emergency Management Agency
FFA	Federal Facility Agreement
FFEO	Federal Facilities Enforcement Office (OECA)
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FINDS	Facility Index System
FMD	Financial Management Division
FOIA	Freedom of Information Act
FR	<i>Federal Register</i>
FRC	Federal Records Center
FS	Feasibility Study
FSAP	Field Sampling and Analysis Plan

F *(continued)*

FTE	Full-Time Equivalent
FUDS	Formerly Used Defense Sites
FWPCA	Federal Water Pollution Control Act
FY	Fiscal Year

G

GAAPs	Generally Accepted Accounting Principles
GAAS	Generally Accepted Accounting Standard
GAO	General Accounting Office
GFO	Good Faith Offer
GIS	Geographic Information System
GNL	General Notice Letter
GPRA	Government Performance and Results Act
GSA	General Services Administration

H

HASP	Health and Safety Plan
HAZWOPER	Hazardous Waste Operations and Emergency Response
HQ	Headquarters
HRS	Hazard Ranking System
HSWA	Hazardous and Solid Waste Amendments (RCRA)

I

IAG	Interagency Agreement
IFMS	Integrated Financial Management System
IG	Inspector General
IGCE	Independent Government Cost Estimate
IMC	Information Management Coordinator

L

LAN	Local Area Network
LDR	Land Disposal Restrictions
LOE	Level of Effort
LSI	Listing Site Inspection
LTRA	Long-Term Response Action
LUST	Leaking Underground Storage Tank

M

MARS	Management and Accounting Reporting System
MCL	Maximum Contaminant Level
MCLG	Maximum Contaminant Level Goal
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
MSCA	Multi-Site Cooperative Agreement
MSDSs	Material Safety Data Sheets
MSW	Municipal Solid Waste
MUNIS	Municipalities

N

NAAG	National Association of Attorneys General
NARPM	National Association of Remedial Project Managers
NBAR	Non-Binding (Preliminary) Allocation of Responsibility
NCLP	National Contract Laboratory Program
NCP	National Contingency Plan
NEIC	National Enforcement Investigation Center
NEJAC	National Environmental Justice Advisory Council
NEPA	National Environmental Policy Act
NESHAPS	National Emissions Standards for Hazardous Air Pollutants
NETI	National Enforcement Training Institute (OECA)
NFRAP	No Further Remedial Action Planned
NOAA	National Oceanic and Atmospheric Administration
NOSC	National Association of OSCs
NOV	Notice of Violation
NPDES	National Pollution Discharge Elimination System
NPL	National Priorities List
NRC	National Response Center
NRC	Nuclear Regulatory Commission
NRDs	Natural Resource Damages
NRT	National Response Team
NTCRs	Non-Time-Critical Removals
NTIS	National Technical Information Service

O

O&F	Operational and Functional
O&M	Operation and Maintenance
OAM	Office of Acquisition Management
OARM	Office of Administration and Resources Management
OD	Office Director
ODCs	Other Direct Costs
OECA	Office of Enforcement and Compliance Assurance
OEJ	Office of Environmental Justice
OERR	Office of Emergency and Remedial Response (now known as OSRTI)
OGC	Office of General Counsel
OIA	Office of International Activities
OIG	Office of the Inspector General
OMB	Office of Management and Budget
OPA	Oil Pollution Act of 1990
ORC	Office of Regional Counsel
ORD	Office of Research and Development
OSC	On-Scene Coordinator
OSHA	Occupational Safety and Health Administration
OSRE	Office of Site Remediation Enforcement (OECA)
OSRTI	Office of Superfund Remediation and Technology Innovation (formerly known as OERR)
OSW	Office of Solid Waste
OSWER	Office of Solid Waste and Emergency Response
OTIS	On-Line Targeting Information System
OU	Operable Unit

P

PA	Preliminary Assessment
PA/SI	Preliminary Assessment/Site Investigation
PCB	Polychlorinated Biphenyl
PCOR	Preliminary Close Out Report
PNRS	Preliminary Natural Resources Survey
PO	Project Officer
POLREP	Pollution Report
POTW	Publicly Owned Treatment Works
PPA	Prospective Purchaser Agreement
PPB	Parts per Billion
PPED	Policy and Program Evaluation Division (OSRE)
PPM	Parts per Million
PR	Procurement Request
PRP	Potentially Responsible Party
PRSC	Post-Removal Site Control

Q

QA	Quality Assurance
QA/QC	Quality Assurance/Quality Control
QAPP	Quality Assurance Project Plan

R

R&D	Research and Development
RA	Remedial Action
RA	Regional Administrator
RAC	Response Action Contractor
RACS	Response Action Contracting Strategy
RCMS	Removal Cost Management System
RCRA	Resource Conservation and Recovery Act
RCRAInfo	Resource Conservation and Recovery Act Information System
RD	Remedial Design
RD/RA	Remedial Design/Remedial Action
RDT	Regional Decision Team
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
RODS	Record of Decision System
RP	Responsible Party
RPM	Remedial Project Manager
RPO	Regional Project Officer
RQ	Reportable Quantity
RRT	Regional Response Team
RSD	Regional Support Division (OSRE)
RSE	Removal Site Evaluation
RSI	Removal Site Inspection
RTP	Research Triangle Park, North Carolina

S

SACM	Superfund Accelerated Cleanup Model
SAM	Site Assessment Manager
SAP	Sampling and Analysis Plan
SARA	Superfund Amendments and Reauthorization Act of 1986
SAS	Special Analytical Services
SBA	Small Business Administration
SBREFA	Small Business Regulatory Enforcement Flexibility Act
SCA	State Cooperative Agreement
SCAP	Superfund Comprehensive Accomplishments Plan
SCORE\$	Superfund Cost Organization and Recovery Enhancement System
SDWA	Safe Drinking Water Act
SEE	Senior Environmental Employee
SEP	Supplemental Environmental Project
SESS	Superfund Enforcement Support Service
SETS	Superfund Enforcement Tracking System
SF	Superfund
SI	Site Inspection
SMOA	State Memorandum of Agreement
SNL	Special Notice Letter
SOL	Statute of Limitations
SOP	Standard Operating Procedure
SOW	Scope of Work
SOW	Statement of Work
SREA	Superfund Recycling Equity Act
SSC	Superfund State Contract
SSI	Screening Site Investigation
STARS	Strategic Targeting Activities Reporting System
START	Superfund Technical Assessment and Response Team

T

TAG	Technical Assistance Grant
TAT	Technical Assistance Team
TBC	To Be Considered (Material)
TBD	To Be Determined
TC	Time-Critical (Removal)
TCLP	Toxicity Characteristic Leaching Procedure
TDD	Technical Directive Document
TDD	Telecommunications Device for the Deaf
TDM	Technical Direction Memorandum
TIO	Technology Innovation Office (OSWER) (now known as TIP)
TIP	Technology Innovation Program (OSWER) (formerly known as TIO)
TRI	Toxic Release Inventory
TSCA	Toxic Substances Control Act
TSDF	Treatment, Storage, and Disposal Facility

U

UAO	Unilateral Administrative Order
UCC	Uniform Commercial Code
USACE	U.S. Army Corps of Engineers
U.S.C.	U.S. Code
USCG	U.S. Coast Guard

U *(continued)*

USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	Underground Storage Tank

W

WA	Work Assignment
WACR	Work Assignment Completion Report
WAF	Work Assignment Form
WAM	Work Assignment Manager
WasteLAN	Waste Local Area Network

Glossary

Administrative Order on Consent (AOC):	A legal agreement signed by EPA and an individual, business, or other entity through which the entity agrees to take an action, refrain from an activity, or pay certain costs. It describes the actions to be taken, may be subject to a public comment period, applies to civil actions, and can be enforced in court. AOCs are most commonly used for removal actions and RI/FSs, but may be used for de minimis and cost recovery settlements.
Administrative Record (AR):	The body of documents that "forms the basis" for the selection of a particular response at a site. For example, the AR for remedy selection includes all documents that were "considered or relied upon" to select the response action. An AR must be available at or near every site to permit interested individuals to review the documents and to allow meaningful public participation in the remedy selection process. This requirement does not apply to other ARs, such as those for deletion.
Administrative Subpoena:	A command issued by EPA requiring testimony and, if necessary, the production of documents deemed necessary to the administrative investigation of a site. CERCLA section 122(e)(3)(B) authorizes the issuance of administrative subpoenas as is "necessary and appropriate" to gather information to perform a non-binding preliminary allocation of responsibility or "for otherwise implementing CERCLA section 122." No legal mandate prohibits the use of an administrative subpoena as an initial information gathering tool; however, the Agency prefers using 104(e) requests before issuing administrative subpoenas.
Alternative Dispute Resolution (ADR):	A process that allows parties to resolve their disputes without litigating them in court. ADR involves the use of neutral third parties to aid in the resolution of disputes through methods that include arbitration, mediation, mini-trials, and fact finding.
Arbitrary and Capricious:	Characterization of a decision or action taken by an administrative agency or inferior court meaning willful and unreasonable action without consideration or in disregard of facts or without determining principle. Under CERCLA section 130(j)(2), a court ruling on a challenge to a response action decision will apply the arbitrary and capricious standard of review.
Arbitration:	An alternative dispute resolution technique that involves the use of a neutral third party to hear stipulated issues pursuant to procedures specified by the parties. Depending upon the agreement of the parties and any legal constraints against entering into binding arbitration, the decision of the arbitrator may or may not be binding.

Brownfields:

In general, the term refers to real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. The term does not include:

- a facility that is the subject of a planned or ongoing removal action under CERCLA;
- a facility that is listed or proposed for listing on the National Priorities List (NPL);
- a facility that is the subject of a unilateral administrative order, a court order, an order of consent or judicial consent decree that has been issued to or entered into by the parties under CERCLA, the Solid Waste Disposal Act (SWDA), the Federal Water Pollution Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SDWA);
- a facility that is subject to corrective action under SWDA section 3004(u) or 3008(h), and to which a corrective action permit or order has been issued or modified to require the implementation of corrective measures;
- a facility that is a land disposal unit with respect to which a closure notification under Subtitle C of the SWDA has been submitted, and closure requirements have been specified in a closure plan or permit;
- a facility that is subject to the jurisdiction, custody, or control of a department, agency, or instrumentality of the United States for an Indian tribe;
- a portion of a facility at which there has been a release of polychlorinated biphenyls (PCBs), and that is subject to remediation under the TSCA; or
- a portion of a facility, for which portion, assistance for response activity has been obtained under Subtitle I of SWDA from the Leaking Underground Storage Tank Trust Fund established under section 9508 of the Internal Revenue Code of 1986.

Cash-Out:

A settlement that requires PRPs to provide up-front financing for a portion of the response action, rather than performing the work themselves. There are several types of cash-out settlement. A mixed-funding cash-out settlement requires the settling PRP to provide a substantial portion of the total response costs whereas a de minimis cash-out settlement requires a minor portion of the response costs to be paid by the settling PRPs.

CERCLA 106(b) Reimbursement Petition:	Petition by an entity, which has complied with a unilateral administrative order, requesting reimbursement from EPA for reasonable costs plus interest of conducting a response action. A person may be entitled to reimbursement if the person can establish that he or she is not liable for response costs under CERCLA section 107(a) or if the person can demonstrate that the Agency's selection of the response action was arbitrary and capricious or was otherwise not in accordance with law.
CERCLIS:	The acronym for the Comprehensive Enforcement Response, Compensation, and Liability Information System; a national information management system for the CERCLA program. CERCLIS inventories and tracks releases, accomplishments, expenditures, and planned actions at potential and actual Superfund sites.
Cleanup Activities:	Actions taken to deal with a release or threatened release of a hazardous substance that could affect humans or the environment. The term "cleanup" is sometimes used interchangeably with the terms remedial action, removal action, response, or corrective action.
Comment Period:	Period provided for public to review and comment on a proposed EPA action, rulemaking, or settlement.
Community Relations (Involvement):	EPA's program to inform and encourage public participation in the Superfund process and to respond to community concerns and incorporate them into the Agency decision-making process.
Community Relations (Involvement) Coordinator (CRC or CIC):	Lead Agency staff who works to involve and inform the public about the Superfund process and cleanup actions.
Community Relations Plan (CRP):	A document that identifies techniques used by EPA to communicate effectively with the public during the Superfund cleanup process at a specific site. This plan describes the site history, the nature and history of community involvement, and concerns expressed during community interviews. Additionally, the plan outlines methodologies and timing for continued interaction between the Agency and the public at the site.

Consent Decree (CD):	A legal document, approved by a judge, that formalizes an agreement reached between EPA and one or more potentially responsible parties (PRPs) outlining the terms under which that PRP(s) will conduct all or part of a response action, pay past costs, cease or correct actions or processes that are polluting the environment, or comply with regulations where failure to comply caused EPA to initiate regulatory enforcement actions. The CD describes the actions PRPs will take, is subject to a public comment period prior to its approval by a judge, and is enforceable as a final judgment by a court.
Contribution:	A legal principle according to which an entity can seek to recover some of the response costs for which it has already resolved liability with the United States. For example, when several PRPs are liable for a hazardous substance release, EPA is not required to pursue all of the PRPs. If EPA settles with or wins its case against a subset of PRPs, then the right of contribution enables the PRPs (i.e., the settling PRPs or those against whom a judgment is rendered) to seek recovery of a proportional share from other PRPs who were not named as defendants in EPA's suit or settlement, but who nonetheless contributed to the release.
Contribution Protection:	A statutory provision that provides that any PRP who resolved its liability to the United States in an administrative or judicially approved settlement is not liable to other PRPs for claims of contribution regarding matters addressed in the settlement.
Cooperative Agreement (CA):	Mechanism used by EPA to provide Fund money to states, political subdivisions, or Indian tribes to conduct or support the conduct of response activities. Subpart O of the NCP, 40 CFR Part 35, outlines specific response actions that may be conducted using CA funds.
Cost Recovery:	A process by which the U.S. government seeks to recover money previously expended in performing any response action from parties liable under CERCLA section 107(a). Recoverable response costs include both direct and indirect costs.
Covenant Not to Sue:	A contractual agreement, such as those authorized by CERCLA section 122(f) and embodied in a consent decree or administrative order on consent, in which the Agency agrees not to sue settling PRPs for matters addressed in the settlement. EPA's covenant not to sue is given in exchange for the PRPs' agreement to perform the response action or to pay for cleanup by the Agency, and does not take effect until PRPs have completed all actions required by the consent decree and administrative order on consent.

Covenant Not to Sue (<i>cont'd</i>):	Covenants not to sue are generally given in either consent decrees or administrative orders. Under CERCLA, the use of covenants not to sue is discretionary. In effect, the Agency is authorized to agree to such a release of future liability only if the terms of the covenant include "reopeners."
Declaratory Judgment:	A binding adjudication of rights and status of litigants. Within the context of CERCLA, the United States may file a claim seeking declaratory judgment on liability for past and future response costs at the site. If declaratory judgment on liability is granted, the United States does not have to prove liability in any future action with the defendant.
Defendant:	A person against whom a claim or charge is brought in a court of law.
Demand Letter:	A written demand for recovery of costs incurred under CERCLA. The primary purposes of written demands are to formalize the demand for payment of incurred costs plus future expenditures, inform potential defendants of the dollar amount of those costs, and establish that interest begins to accrue on expenditures. A demand letter may be incorporated into the special notice letter.
De Micromis Exemption:	In general, a party shall not be liable under CERCLA section 107 if it can demonstrate that the total amount of the material containing hazardous substances that it generated and arranged for disposal at, or accepted for transport to, an NPL site was less than 110 gallons of liquid materials or less than 200 pounds of solid materials, unless those substances contributed significantly to the cost of the response action or natural resource restoration with respect to the facility; or the party has been uncooperative with EPA's response actions at the site; or the party has been convicted of a criminal violation for the conduct to which the exemption would apply.
De Minimis Contributor:	PRPs who are deemed by the settlement agreement to be responsible for only a minor portion of the response costs at a particular facility. A determination of a PRP's responsibility is made based on the volume, toxicity, or other hazardous effects in comparison with other wastes at the facility. CERCLA section 122(g)(1)(A) expressly defines de minimis contributor.
De Minimis Landowner:	PRPs who are deemed by the settlement agreement to be past or present owners of the real property at which the facility is located who did not conduct or permit the generation, transportation, storage, treatment or disposal of any hazardous substance at the facility, did not contribute to the release or threat of release of a hazardous substance at the facility through any act or omission, and had no

De Minimis Landowner (cont'd):	actual or constructive knowledge that the property was used for the generation, transportation, storage, treatment, or disposal of any hazardous substance at the time of purchase. CERCLA section 122(g)(1)(B) expressly defines de minimis landowner.
De Minimis Settlement:	An agreement, either administrative or judicial, authorized by CERCLA section 122(g), between EPA and PRPs for a minor portion of response costs.
De Novo:	Generally, a new hearing or a hearing for the second time. At a <i>de novo</i> hearing, the court hears the case as the court of original and not appellate jurisdiction. Under CERCLA, for example, a judge may hear a case <i>de novo</i> if the administrative record is found to be incomplete or inaccurate. Such a hearing would allow judicial review that is not limited to the administrative record. A potential result of a <i>de novo</i> trial could be the court selecting the remedy.
Discovery:	A pre-trial procedure that enables parties to learn the relevant facts about the case. The Federal Rules of Evidence provide for extremely broad discovery. The basic tools of discovery are depositions, interrogatories, and requests for production of documents. One of the few limitations on the scope of discovery is that the material sought must be relevant to the subject matter of the pending suit, or likely to lead to the production of relevant material.
Easement:	A right afforded to an entity to make limited use of another's real property. An easement is one form of institutional control that may be required at a Superfund site if all the hazardous substances cannot be removed from the site. Easements may include limiting access or control of surface activities.
Eminent Domain:	The power to take private property for public use. Under the U.S. Constitution, there must be just compensation paid to the owners of this property. EPA exercises its power of eminent domain through the process of condemnation.
Enforcement Actions:	EPA, state, or local legal actions to obtain compliance with environmental laws, rules, regulations, or agreements, or to obtain penalties or criminal sanctions for violations.
Environmental Justice (EJ):	The fair treatment of people of all races, incomes, and cultures with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment implies that no person or group should shoulder a disproportionate share of negative environmental impacts resulting from the execution of environmental programs.

Explanation of Significant Differences (ESD):	A document regarding a significant change to the record of decision when new information is discovered about a site or difficulties are encountered during the remedial design/remedial action phase of cleanup. An ESD is appended to the administrative record to inform the public of any significant changes that are being made to the selected remedy.
Extraordinary Circumstances:	Situations that justify the deletion of a standard reopener in a consent decree. This release is granted infrequently and is given in response to unusual conditions related to liability, viability, or physical circumstances.
Federal Lien:	A lien in favor of the United States authorized by CERCLA section 107(l) that may be imposed upon a PRP's property subject to a response action. The lien arises when the PRP receives written notice of its potential liability for response costs under CERCLA, or the Agency actually incurs response costs at a particular site. The lien continues until the PRP's liability is fully satisfied or the claim becomes unenforceable by operation of the statute of limitations.
Federal Register:	A federal government publication that includes proposed regulations, responses to public comments received regarding proposed regulations, and final regulations. The <i>Federal Register</i> is published every working day by the Office of Federal Register, National Archives and Records Administration, Washington, DC 20408. The <i>Federal Register</i> publishes regulations and legal notices issued by federal agencies. These include presidential proclamations and executive orders, federal agency documents required by Congress to be published, and other federal agency documents of public interest. The <i>Federal Register</i> is available to the public through public libraries that are federal depositories, law libraries, and large university libraries.
Force Majeure:	A clause common to construction contracts which protects the parties in the event that a portion of the contract cannot be performed due to causes that are outside of the parties' control (i.e., problems that could not be avoided by the exercise of due care, such as an act of God). These causes are known as <i>force majeure</i> events. <i>Force majeure</i> provisions are included in administrative orders on consent and consent decrees. These provisions stipulate that the PRPs shall notify EPA of any event that occurs that may delay or prevent work and that is due to <i>force majeure</i> . Two examples of <i>force majeure</i> may be raised as defenses to liability. CERCLA section 107(b) releases from liability any person who can establish by a preponderance of the evidence that the release or threat of release of a hazardous substance was caused solely by an act of God or an act of war (i.e., <i>force majeure</i> .)

Full Release:	An agreement by EPA to release a PRP from any further liability for response costs. Under CERCLA section 122(j)(2), natural resource trustees may grant full releases of liability for damages to natural resources.
Fund (Hazardous Substance Superfund or Superfund Trust Fund):	A fund set up under CERCLA to help pay for cleanup of hazardous waste sites and for legal action to force cleanup actions on those responsible for the sites. The fund is financed primarily with a tax on crude oil and specified commercially used chemicals.
General Notice Letter (GNL):	A notice to inform PRPs of their potential liability for past and future response costs and the possible future use of CERCLA section 122(e) special notice procedures and the subsequent moratorium and formal negotiation period.
Generator:	Any person who by contract, agreement, or otherwise arranged for disposal or treatment, or arranged with a transporter for disposal or treatment of hazardous substances owned or possessed by such a person, by any other party or entity, at any facility or incineration vessel owned or operated by another party or entity and containing such hazardous substances.
Good Faith Offer (GFO):	A written proposal submitted by a PRP to the EPA to perform or pay for a response action. PRPs are given 60 days from the special notice to provide EPA a written GFO. The GFO must be specific, consistent with the ROD or proposed plan, and indicate the PRPs' technical, financial, and management ability to implement the remedy.
Hazard Ranking System (HRS):	The principal screening tool used by EPA to evaluate risks to public health and the environment associated with abandoned or uncontrolled hazardous waste sites. The HRS calculates a score based on the potential for hazardous substances spreading from the site through the air, surface water, or ground water, and on other factors such as nearby population. This score is the primary factor in deciding if the site should be on the NPL and, if so, what ranking it should have compared to other sites on the list. A site must score 28.5 or higher to be placed on the NPL.
Indian Tribe:	As defined by CERCLA section 101(36), any Indian tribe, band, nation, or other organized group or community, including any Alaska Native village, but not including any Alaska Native regional or village corporation, which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

Information Repository: Where the administrative record, current information, technical reports, and reference materials regarding a Superfund site are stored. EPA or the state establishes the repository in the community as soon as a site is discovered. It provides the public with easily accessible information. Repositories are established for all sites where cleanup activities are expected to last for more than 45 days. Typical community repository locations include public libraries and municipal offices.

Information Request Letter: Formal written requests for information, authorized by CERCLA section 104(e)(2)(A) through (C), issued during an administrative investigation. EPA is authorized to request information from any person who has or may have information relevant to any of the following:

- the kind and quantity of materials that have been or are being generated, treated, disposed of, stored at, or transported to a vessel or facility;
- the nature or extent of a release or threatened release of a hazardous substance, pollutant, or contaminant at or from a vessel or facility; and
- the ability of a person to pay for or perform a cleanup.

Failure to respond to or incomplete response to an informational request is subject to statutory penalties.

Innocent Landowner: A person who purchased or acquired real property without actual or constructive knowledge that the property was used for the generation, transportation, storage, treatment, or disposal of any hazardous substances. PRPs may assert this claim as part of their defense, but only the court may make this determination based on CERCLA sections 107(b) and 101(35).

Joint and Several Liability: A legal doctrine defining the scope of a defendant's liability. When more than one PRP is involved at a site and the harm is indivisible, the court may impose joint and several liability upon all parties involved at the site. In this instance, each PRP involved at the site may be held individually liable for the cost of the entire response action.

Judicial Review: The court's review of a decision rendered by a federal agency or department or a court's review of an appeal challenging either a finding of fact or finding of law. Under CERCLA, for example, the court provides judicial review prior to entry of the consent decree. In addition, the court would provide judicial review of an EPA decision if a

Judicial Review (cont'd):	PRP submitted a "petition to review" to a federal court of appeals. The jurisdiction of the court and the scope of its review are defined by CERCLA section 113(h) and the Judicial Review Act, 28 U.S.C. §§2341-2351.
Lead Agency:	The agency that primarily plans and implements cleanup actions. This could be EPA, state, or political subdivisions, other federal agencies, or Indian tribes. Other agencies may be extensively involved in the process, but the lead agency directs and facilitates activities related to a site, often including enforcement actions.
Mixed Funding:	Settlements whereby EPA settles with fewer than all PRPs for less than 100 percent of the response costs. The settlement must provide a substantial portion, greater than 50 percent of the total response costs, and there must be viable non-settlers from which remaining response costs may be pursued. The three types of mixed funding settlement are preauthorization, cash-out, and mixed work.
Mixed Work:	A type of mixed funding settlement whereby EPA and the PRPs agree to conduct discrete portions of the response action. Often EPA's portion of the work is paid for or performed by other PRPs as a result of subsequent settlements or unilateral administrative orders.
Moratorium:	The period of time after special notice letters are issued during which the Fund will not be used to begin work at the site on the RI/FS or RA. EPA also will not seek to compel PRP action at the site during the moratorium.
Municipal Solid Waste:	<p>Waste material generated by a household; and waste material generated by a commercial, industrial, or institutional entity, to the extent that the waste material:</p> <ul style="list-style-type: none"> • is essentially the same as waste normally generated by a household; • is collected and disposed of with other MSW as part of normal MSW collection; and • contains a relative quantity of hazardous substances no greater than the relative quantity of hazardous substances contained in waste generated by a typical single family household.

National Oil and Hazardous Substances Pollution Contingency Plan (NCP):	The NCP is the major framework regulation for the federal hazardous substances response program. The NCP sets forth procedures and standards for how EPA, other federal agencies, states, and private parties respond under CERCLA to releases or threats of releases of hazardous substances, and under Clean Water Act section 311, as amended by the Oil Pollution Act of 1990, to discharges of oil.
Natural Resources:	Land, fish, wildlife, air, water, ground water, drinking water supplies, and other such resources belonging to, managed by, or controlled by the United States, state or local government, any foreign government, any Indian tribe, or any member of an Indian tribe.
Natural Resource Damages:	Damages for injury or loss of natural resources as set forth in CERCLA sections 107(1) and 111(b) and NCP section 300.615.
Non-Binding Preliminary Allocation of Responsibility (NBAR):	An allocation of the total cost of response among PRPs at a facility. CERCLA section 122(e)(3) allows EPA to provide NBARs to PRPs to facilitate settlement. An NBAR is not binding on the United States or the PRPs and cannot be admitted as evidence in court.
Orphan Share:	A portion of cleanup costs that cannot be assessed to a PRP as a result of either the PRP's insolvency or EPA's inability to identify PRP(s).
Owner or Operator:	Any person owning or operating a vessel or facility, or in the case of a hazardous substance being accepted for transportation, the common or contract carrier. It does not include a unit of state or local government that acquired ownership or control involuntarily through bankruptcy, tax delinquency, or abandonment.
Performance Bond:	A guarantee given by a contractor that a work assignment will be completed according to its terms and within the agreed time.
Performance Standards:	Provisions in consent decrees and administrative orders specifying specific levels of performance that site activities must achieve; often incorporated by reference into the record decision. The inclusion of such performance standards enables the Agency to assure measurable levels of cleanup that provide the protection desired.
Person:	An individual, firm, corporation, association, partnership, joint venture, commercial entity, U.S. government, state, municipality, or any interstate body.
Plaintiff:	A party who brings a legal action; the party who complains or sues in a civil action and is so named on the record.

Potentially Responsible Party (PRP):	Any individual or entity including owners, operators, transporters, or generators who may be liable under CERCLA section 107(a).
Preauthorization:	A type of mixed funding settlement whereby EPA preauthorizes a claim against the Fund by the PRPs for a portion of costs of conducting a response action. Once the preauthorization agreement is finalized, the PRPs conduct the response action, as outlined in settlement agreement, petition non-settling PRPs for reimbursement, and, if necessary, seek reimbursement from the Fund for the preauthorized amount not received from non-settling PRPs.
Premium:	A sum paid or agreed to be paid by a PRP to cover risks associated with settlement. This sum represents an amount in addition to the cost of the response action. For example, a premium may be part of an early de minimis settlement due to potential inaccuracy of total response cost estimates or remedy failure.
Record of Decision (ROD):	The official Agency document that explains which remedial cleanup alternatives have been considered, the selected remedy, technical background relative to the decision, and how the decision complies with the law.
Recalcitrant:	A PRP that is persistently uninterested in or refuses to reach settlement or that fails to comply with a settlement or order.
Recusal:	The voluntary or involuntary removal of a government official from any involvement in a specific matter. Recusal is used to preserve the ethical standards of public service. Recusal generally occurs when there is an appearance of a conflict between governmental responsibilities and private interest. Once a person is removed through recusal, she cannot participate in any activity relating to the matter; specifically, she cannot see any correspondence or participate in any meetings or negotiations related to the issue.
Remand:	A legal term used when a court sends a case back to either a lower court or an administrative agency for further action. For example, under CERCLA, if an administrative record is found to be incomplete or inaccurate, one option of the reviewing court is to remand the case to EPA with instructions to compile an accurate and complete administrative record.

Remedial Action: A remedial action is one that is “consistent with permanent remedy taken instead of or in addition to removal actions in the event of a release or threatened release of a hazardous substance into the environment.” Generally, response actions that take longer than a non-time-critical removal and are more complex than removals.

Removal: A removal is “the clean up or removal of released hazardous substances from the environment, such actions as may be necessary taken in the event of the threat of release...[and] such actions as may be necessary to monitor, assess, and evaluate the release or threat of release of hazardous substances...” Such evaluations include RI/FS. Removals are classified according to urgency as “emergency,” for those requiring immediate response; “time-critical,” for those that take no more than six months; and “non-time-critical” for removals that need up to a year or more.

Reopeners: Contractual provisions that preserve the Agency's right to compel the PRPs to undertake additional response actions or to pay costs for Agency response actions in addition to those agreed to in the settlement. Reopeners to liability are triggered when previously unknown conditions at the site are discovered, or information previously unknown to EPA is received, that indicates the remedial action is not sufficiently protective. Reopener provisions restrict the covenant not to sue by defining the conditions under which the settlement may be re-examined.

Remedial Investigation/ Feasibility Study (RI/FS): Activities conducted at an NPL site by EPA, or a PRP acting under an administrative order on consent (AOC) or (rarely) a unilateral administrative order (UAO), to assess site conditions and evaluate alternatives to the extent necessary to select a remedy, described in the record of decision (ROD), that will clean up the site in accordance with CERCLA section 121.

Remedial Design/Remedial Action (RD/RA): Response actions performed at an NPL site by EPA or a PRP under a consent decree (CD) approved and entered by a federal court. RD is the engineered design of the remedy selected by the RI/FS; RA is the construction and continuing operation and maintenance of the remedy.

Settlement: Resolution of a claim. Settlement occurs when a federal or state agency has a written agreement with PRPs regarding payment for and conduct of specified response actions. Settlements may be achieved administratively through an administrative order on consent or judicially through a consent decree.

Special Account:	A sub-account of the Fund in which cash-out settlement funds may be deposited to segregate the funds and ensure that they are readily accessible for work at the site covered by the settlement.
Special Master:	A court-appointed individual who oversees the progress of a complex case before it goes to trial. The scope of the special master's authority is set forth in an order of reference. Special masters are appointed only under exceptional conditions. For example, special masters may be appointed in cases requiring the interpretation of complicated technical data or voluminous information.
Special Notice Letter (SNL):	A written notice to a PRP providing information on potential liability, conditions of the negotiation moratorium, future response actions, and demand for past costs. The SNL is authorized under CERCLA section 122(e)(1) and triggers the start of the negotiation moratorium.
Statute of Limitations (SOL):	The statutorily defined period of time within which the United States, on behalf of EPA, must file a claim for cost recovery. If the United States does not file a case within the SOL, it may not be able to recover its costs from the PRPs.
Stipulated Penalties:	Fixed sums of money that a defendant agrees to pay for violating the terms of a settlement. Procedures for invoking and appealing stipulated penalties and penalty amounts are agreed to in the administrative order on consent or the consent decrees.
Strict Liability:	Legal responsibility for damages without regard to fault or diligence. The strict liability concept in CERCLA means that the federal government can hold PRPs liable without regard to a PRP's fault, diligence, negligence, or motive.
Transporter:	A person who "accepts or accepted any hazardous substances for transport for disposal" to any site selected by such person, "from which there is a release or threatened release which causes the incurrence of response costs, of a hazardous substance..."
WasteLAN:	The acronym for Waste Local Area Network. For historical reasons, EPA's regions use it when referring to CERCLIS.

Chapter 1 References		
Name	Section	Location
Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986	1.1	42 U.S.C. § 9601 et seq. http://uscode.house.gov/DOWNLOAD/42C103.DOC
National Oil and Hazardous Substances Pollution Contingency Plan	1.1.1	40 C.F.R. Part 300 http://www.access.gpo.gov/nara/cfr/waisidx_02/40cfr300_02.html
Oil Pollution Act of 1990	1.1.1	33 U.S.C. § 2701 et seq. http://www.epa.gov/oilspill/lawsregs.htm
Clean Air Act	1.2.1	42 U.S.C. § 7401 et seq. http://www.epa.gov/air/oaq_caa.html
Clean Water Act	1.2.1	33 U.S.C. § 1251 et seq. http://www.epa.gov/oilspill/lawsregs.htm
Toxic Substances Control Act	1.2.1	15 U.S.C. § 2601 et seq. http://www.access.gpo.gov/uscode/title15/chapter53_.html
Resource Conservation and Recovery Act	1.2.1	42 U.S.C. § 6901 et seq. http://www.epa.gov/epaoswer/osw/laws-reg.htm
CERCLA Hazardous Substances	1.2.1	40 C.F.R. Part 302 http://www.access.gpo.gov/nara/cfr/waisidx_02/40cfr302_02.html

Chapter 1 References		
Name	Section	Location
Comptroller Policy Announcement 87-17, Interest Rates for Debts Recoverable Under the Superfund Amendments and Reauthorization Act of 1986 (September 30, 1986)	1.2.1	http://www.epa.gov/ocfo/finstatement/superfund/int_rate.htm
Small Business Liability Relief and Brownfields Revitalization Act of 2002	1.2.5	Public Law 107-118 (H.R. 2869) http://www.epa.gov/brownfields/pdf/hr2869.pdf
Internal Revenue Code of 1986	1.2.6	26 U.S.C. http://www.access.gpo.gov/uscode/uscmmain.html
Interim Enforcement Discretion Policy Concerning "Windfall Liens" Under Section 107(r) of CERCLA (July 16, 2003)	1.2.6	http://www.epa.gov/compliance/resources/policies/cleanup/superfund
Superfund Recycling Equity Act	1.2.6	42 U.S.C. § 9627 http://www.access.gpo.gov/uscode/uscmmain.html
Used Oil Regulations (September 10, 1992)	1.2.6	57 Federal Register 41,612
Federal Insecticide, Fungicide, and Rodenticide Act	1.2.6	7 U.S.C. § 136 et seq. http://www.epa.gov/opptsfrs/home/rules.htm

Chapter 1 References		
Name	Section	Location
Revised Settlement Policy and Contribution Waiver Language Regarding Exempt De Micromis and Non-Exempt De Micromis Parties (November 6, 2002)	1.2.7	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/wv-exmpt-dmicro-mem.pdf
Interim Policy on CERCLA Settlements Involving Municipalities or Municipal Wastes (December 12, 1989)	1.2.7	Appendix A
Policy for Municipality and Municipal Solid Waste CERCLA Settlements at NPL Co-Disposal Sites (February 5, 1998)	1.2.7	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/munic-solwst-mem.pdf
Interim Guidance on the Municipal Solid Waste Exemption Under CERCLA § 107(p) (August 20, 2003)	1.2.7	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/interim-msw-exempt.pdf
Bona Fide Prospective Purchasers and the New Amendments (May 31, 2002)	1.2.7	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/bonf-pp-cercla-mem.pdf
Policy Toward Owners of Property Containing Contaminated Aquifers (May 24, 1995)	1.2.7	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/contamin-aqui-rpt.pdf

Chapter 1 References		
Name	Section	Location
Policy Towards Owners of Residential Property at Superfund Sites (July 3, 1991)	1.2.7	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/policy-owner-rpt.pdf
Revised Final Guidance on Disseminating EPA's SBREFA Information Sheet to Businesses at the Time of Enforcement Activity (August 31, 1999)	1.3.1	http://www.epa.gov/compliance/resources/policies/civil/sbrefa/index.html
Small Business Fact Sheet	1.3.1	http://www.epa.gov/compliance/incentives/smallbusiness/index.html
Orphan Share Policy (June 3, 1996)	1.3.2	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/orphan-share-rpt.pdf
Superfund Removal Procedures Removal Enforcement Guidance for On-Scene Coordinators (April 1992)	1.3.2	EPA Publication 9360.3-06 http://www.ntis.gov/products/epasuper.htm
Enforcement Project Management Handbook	1.3.3	http://intranet.epa.gov/oeca/osre/hbk-pdf/index.html
Addendum to the Interim CERCLA Settlement Policy Issued on December 5, 1984 (September 30, 1997)	1.3.3	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/adden-settle-mem.pdf

Chapter 2 References		
Name	Section	Location
Applicable or Relevant and Appropriate Requirements (ARARs)	2.0	http://www.epa.gov/superfund/action/guidance/remedy/arars.htm
List of Regional COs and POs	2.1.1	Appendix B
Environmental Programs Assistance Act (June 12, 1984)	2.1.1	http://www.epa.gov/epahrist/see/brochure/law.htm
Title V of the Older Americans Act	2.1.1	42 U.S.C. § 3056 et seq. http://wdsc.doleta.gov/seniors/other_docs/owp-106-501.pdf
Superfund Reforms Home Page (June 1993, February 1995, and October 1995)	2.1.2	http://www.epa.gov/superfund/programs/reforms
Releasing Information to PRPs at CERCLA Sites (March 1, 1990)	2.1.2	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/release-prp-rpt.pdf
Issuance of Interim Rule: Disclosure of Confidential Data to Authorized Representatives of the United States and Potentially Responsible Parties (January 5, 1993)	2.1.2	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/iss-confdata-mem.pdf
Revised Final Guidance on Disseminating EPA's SBREFA Information Sheet to Businesses at the Time of Enforcement Activity (August 31, 1999)	2.1.2	http://www.epa.gov/compliance/resources/policies/civil/sbrefa/index.html

Chapter 2 References		
Name	Section	Location
Small Business Fact Sheet	2.1.2	http://www.epa.gov/compliance/incentives/smallbusiness/index.html
Privacy Act	2.1.2	5 U.S.C. § 552 et seq. http://www.access.gpo.gov/uscode/title5/parti_chapter5_.html
40 CFR Part 2, Subpart B (CBI)	2.1.2	40 C.F.R. Part 2 http://www.access.gpo.gov/nara/cfr/cfrhtml_00/Title_40/40cfr2_00.html
Sample Information Request Letter Questions	2.1.2	http://intranet.epa.gov/oeca/osre/docs/html
Documentation of Reason(s) for Not Issuing CERCLA §106 UAOs to All Identified PRPs (August 2, 1996)	2.1.2	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/reason-cer106-rpt.pdf
Enforcement Project Management Handbook	2.3	http://intranet.epa.gov/oeca/osre/hbk-pdf/index.html
National Oil and Hazardous Substances Pollution Contingency Plan	2.3.1	40 C.F.R. Part 300 http://www.access.gpo.gov/nara/cfr/waisidx_02/40cfr300_02.html
Multi-site Open Work Assignment (expedited work assignment)	2.3.1	Appendix C
Checklist for Removal/Pre-remedial Sites	2.3.1	Appendix D

Chapter 2 References		
Name	Section	Location
Revised Policy on Discretionary Information Release Under CERCLA (March 31, 1993)	2.4	Appendix E
Freedom of Information Act (Reference Guide)	2.4	5 U.S.C. § 552 et seq. http://www.epa.gov/foia/guide.html
Quick Reference Guide for Using CERCLIS/WasteLAN	2.5.2	Appendix F

CHAPTER 3 REFERENCES		
Name	Section	Location
Checklist of PRP Search Tasks	3.0	Appendix G
Enforcement Project Management Handbook	3.2	http://intranet.epa.gov/oeca/osre/hbk-pdf/index.html
PRP Search Enhancement Team Members/Contacts	3.2.1	Appendix H
Transmittal of Sample Documents for More Effective Communication in CERCLA Section 104(e)(2) Information Requests (June 30, 1995)	3.3	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/sampledoc-cercla-mem.pdf
Disk Repository of Current CERCLA Section 104(e) Questions	3.3	http://intranet.epa.gov/oeca/osre/doc/960229.html
On-Line Sources of PRP Information	3.3.1	Appendix I
Superfund Enforcement Directory	3.3.1	Appendix J
False Statements Act	3.3.1	http://www.access.gpo.gov/uscode/title18/parti_chapter47_.html
Federal Debt Collection Procedures Act	3.3.1	http://www.access.gpo.gov/uscode/title28/partvi_chapter176_.html
Releasing Information to Potentially Responsible Parties at CERCLA Sites (March 1, 1990)	3.3.1	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/release-prp-rpt.pdf
EPA Regulations Governing Business Confidentiality Claims, 40 C.F.R. § 2.201-2.215	3.3.3	http://www.access.gpo.gov/nara/cfr/waisidx_01/40cfr2_01.html

CHAPTER 3 REFERENCES		
Name	Section	Location
Federal Rules of Evidence 801-817	3.4.1	http://www.access.gpo.gov/uscode/title28a/28a_5_.html
Federal Perjury Statute, 18 U.S.C. § 1621	3.4.2	http://www.access.gpo.gov/uscode/title18/parti_chapter79_.html
Final Guidance on Preparing Waste-In Lists and Volumetric Rankings for Release to Potentially Responsible Parties (PRPs) Under CERCLA (February 22, 1991)	3.8	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/guide-volumet-rpt.pdf
Streamlined Approach for Settlements With De Minimis Waste Contributors Under CERCLA Section 122(g)(1)(A) (July 30, 1993)	3.8	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/app-deminimis-rpt.pdf

CHAPTER 4 REFERENCES		
Name	Section	Location
Disk Repository of Current CERCLA Section 104(e) Questions (June 17, 1999)	4.1	http://intranet.epa.gov/oeca/osre/doc/960229.html
Model Administrative Order for CERCLA Information Requests (September 30, 1994)	4.2	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/modao-cerinf-mem.pdf
Civil Monetary Penalty Inflation Rule (December 31, 1996)	4.2	http://www.epa.gov/compliance/resources/policies/civil/penalty/cmpiar.html
Final Model Litigation Report and Complaint for CERCLA Section 104(e) Initiative (January 1990)	4.2	http://intranet.epa.gov/oeca/osre/docs.html
Recommendations Concerning the Use and Issuance of Administrative Subpoenas under CERCLA Section 122 (August 30, 1991)	4.3	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/subpoena-cercla-mem.pdf
Guidance on Use and Enforcement of CERCLA Information Requests and Administrative Subpoenas (August 25, 1988)	4.3	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/cerc-infreq-mem.pdf
Federal Rules of Civil Procedure, Rule 27, 28 U.S.C	4.4	http://www.wvnb.uscourts.gov/frcp.htm#rule27
General Policy on Superfund Ability to Pay Determinations (September 30, 1997)	4.5.1	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/genpol-atp-rpt.pdf
Index of OECA enforcement computer models and user manuals	4.5.2	http://www.epa.gov/compliance/civil/programs/econmodels/index.html

CHAPTER 4 REFERENCES		
Name	Section	Location
Financial Statements for Individuals, Businesses, and Trusts	4.5.2	Appendix K
EDGAR	4.5.2	http://www.sec.gov/edgar.shtml
On-Line Sources of PRP Information	4.5.2	Appendix I
Interim Enforcement Discretion Policy Concerning "Windfall Liens" Under Section 107(r) of CERCLA (July 16, 2003)	4.5.3	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/interim-windfall-lien.pdf
Interim Guidance on Orphan Share Compensation for Settlers of Remedial Design/Remedial Action and Non-Time-Critical Removals (June 4, 1996)	4.6.1	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/orphan-share-rpt.pdf
Addendum to the Interim CERCLA Settlement Policy Issued on December 5, 1984 (September 30, 1997)	4.6.1	http://www.epa.gov/compliance/resources/policies/cleanup/superfund/adden-settle-mem.pdf