

**Superfund Program Implementation Manual FY 09**

**Appendix A: Site Assessment/NPL Listing**

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**APPENDIX A:  
SITE ASSESSMENT/NPL LISTING**

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## **APPENDIX A: SITE ASSESSMENT/NPL LISTING**

### ***A.A. SITE ASSESSMENT***

Assessing the worst sites first continues as a national priority. The regions should identify the sites posing the highest risk or potential risk and develop a strategy to assess those sites in a timely manner, while balancing their other site assessment needs.

While assessing the worst sites first, the regions also need to ensure that the backlog of sites needing Preliminary Assessments (PAs), Site Inspections (SIs), or Expanded Site Inspections (ESIs) does not grow unacceptably. The regions should consider integrating assessments to reduce cost and time to assess sites. Regions should continue the use of pre-CERCLIS screening to assure only appropriate sites are placed in CERCLIS. The regions should also ensure the appropriate investigations of sites of Tribal concern that are on or near Indian Country.

To better accomplish the national priorities, the regions should continue negotiating work share agreements with individual States (and Tribes if applicable). This will help divide up the site assessment work and potentially enhance relations with the States and Tribes. This process will also serve to identify the current lead agency for the public.

Given sizeable workloads and constrained resources, regions are encouraged to pursue more cost- and time-efficient methods of assessing sites without compromising the quantity and quality of site assessment decisions. Regions should communicate progress and results of new assessment methods to other EPA regional and headquarters (HQ) site assessment staff.

HQ and regions should continue the streamlined process for listing sites on the National Priority List (NPL) and evaluate alternatives to listing sites while providing NPL quality cleanups.

Site assessment is the first step in determining whether a site meets the criteria for placement on the NPL. Listing a site on the NPL is one tool among many that are available to EPA and State cleanup program managers to accomplish the cleanup of contaminated waste sites. In light of current program resource realities, Fund-financed remedial action at NPL sites has become the tool of last resort. In 1992, EPA's Office of Emergency and Remedial Response (OERR, now OSRTI) issued a directive entitled Guidance on Setting Priorities for NPL Candidate sites (OSWER Directive 9203.1-06). The 1992 directive provided regions with general factors that should be considered in the risk-based decision making process for choosing sites to propose for listing pursuant to section 105(a)(8)(B) of CERCLA. These can include recently identified sites, sites earlier in the site assessment process, or previously deferred RCRA sites. The regions should ensure the appropriate investigation of sites of tribal concern including sites in or near Indian Country.

### ***A.B. SITE ASSESSMENT BACKLOGS***

A key function of HQ is to report national progress in the site assessment program. Workload estimates are critical indicators of future program needs. HQ captures these workload estimates by identifying the number of sites at various stages in the site assessment pipeline. These stages are commonly referred to as "backlogs". For example, sites needing completion of a CERCLA PA are collectively termed the "PA Backlog". Throughout this appendix, the procedure HQ uses to derive backlog is provided for each step in the site assessment process.

### ***A.C. OVERVIEW OF FY 09 SITE ASSESSMENT/NPL LISTING TARGETS AND MEASURES***

The Superfund Comprehensive Accomplishments Plan (SCAP) is used by the Assistant Administrator for the Office of Solid Waste and Emergency Response (AA OSWER), Assistant Administrator for the Office of Enforcement and Compliance Assurance (AA OECA), and senior Superfund managers to monitor the progress each region is making towards achieving the Government Performance and Results Act (GPRA) annual performance goals. In addition, SCAP is used as an internal management tool to project and track activities that contribute to these GPRA goals and support resource allocation. The program will set national goals based on historical performance and performance expectations for the measures performance in GPRA. Regions should continue to plan and report accomplishments for FADs in CERCLIS.

The following pages contain, in pipeline order, the definitions of the FY 09 Superfund site assessment targets and measures. Exhibit A.1. displays the full list of site assessment and activities defined in this Appendix. Exhibit A.2. , at the end of this Appendix, identifies the Subject Matter Experts (SMEs).

### ***A.D. GPRA AND SITE ASSESSMENT***

Goal 3, Objective 3.2, Sub-objective 3.2.2: Clean Up and Revitalize Contaminated Land contains the GPRA subobjective for Superfund assessment work. This subobjective states: By 2011, control the risks to human health and the environment at contaminated properties or sites through cleanup, stabilization, or other action, and make land available for reuse. The Strategic Target for Superfund assessment work is that by 2011, EPA will:

- Make final (remedial) assessment decisions at 40,491 of 44,700 potentially hazardous waste sites evaluated by EPA to help resolve community concerns on whether these sites require long-term cleanup to protect public health and the environment, and to help determine if they can be cleared for possible redevelopment. (By the end of FY 2007, a total of 39,766 final site assessment decisions had been made.)

#### **A.D.1. Final Assessment Decisions (FADs)**

Superfund final remedial assessment decisions (FADs) are used as an indicator to measure progress towards completing remedial site assessment work at sites entered into CERCLIS. A FAD indicates no further remedial site assessment work is necessary under the federal Superfund Program based on available information.

Regions may assign a FAD designation to a site entered into CERCLIS with a discovery action and date if any of the following conditions are met:

- The site has been proposed to or placed on the National Priorities List (NPL);
- The site has been removed from proposal to the NPL and no further remedial assessment is needed;
  - The decision made at the last completed remedial assessment at the site is either: No further remedial action planned (NFRAP);
  - Referred to Removal-NFRAP
  - Deferred to RCRA or NRC; or
  - Addressed as part of an NPL or non-NPL site;
- The site is being remediated under a formal state deferral agreement;
- The site is being remediated using a Superfund Alternative Agreement;
- The site has been cleaned up or is making progress towards cleanup as supported by documentation (worksharing agreements, site-specific progress reports, AOCs, remedial action plans, VCP/other MOAs, etc.) between the non-EPA party and EPA stating that the site has been or is being cleaned up or addressed according to appropriate cleanup standards;
- The site has been properly archived from the active CERCLIS site inventory.

Regions must delete the FAD designation should conditions change such that the site no longer meets any of the above conditions. When new information is received on a site with a FAD designation, Regions should evaluate the new information and determine whether further remedial assessment work is required. The FAD designation may remain at the site while the information is being evaluated. The FAD designation should be removed if the evaluation determines that a new remedial site assessment report is needed.

EPA regions are responsible for maintaining FAD designations in CERCLIS. FAD status is captured in CERCLIS by selecting the Final Assessment Decision check box on the Site Description & Status/Operable Units screen. Once the FAD box is checked, CERCLIS automatically populates the related Final Assessment Decision Date field with the current calendar date. Regions can accept or edit this date before saving the information in CERCLIS. The FAD date should match the calendar date when the FAD decision was made. Backdating the FAD date is appropriate when data entry lags occur, even if the lag spans across fiscal years (e.g., sites where the FAD decision was made in a previous fiscal year, but the FAD box was inadvertently left unchecked).

Sites without completed discovery actions (e.g., removal-only sites) will not be recognized as having a FAD for GPRA reporting purposes. Further, only sites with a FAD date falling in the current fiscal year will get captured in current year accomplishment reporting. All sites with a FAD and a completed discovery action will get captured in cumulative accomplishment (inception to-date) reporting.

The number of FADs in a fiscal year and the cumulative number of sites with a FAD (inception to end of fiscal year) are included in EPA's Annual Report. These accomplishments are tabulated on the SCAP-15 report.

## A.D.2. Data Quality for Final Assessment Decisions

### a. Timeliness Requirement

The FADs designation should be updated whenever site conditions change dictating that the FAD is applicable or no longer applicable. Note special circumstances above. It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the activity occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of each quarter or the 10th business day following the end of the fourth fiscal quarter.)

### b. Reports and Guidance

- SCAP-15 Report;
- The number of Final Assessment Decisions is included in EPA's Annual Performance and Accountability Report and in EPA's Annual Superfund Report;
- Site assessment charts in eFacts;
- Superfund Program Implementation Manual (SPIM) OSWER Directive 9200.3-14-1G-Q;
- Reporting Final Assessment Decision Status Quick Reference Guide, June 2008;
- Final Assessment Decision Data Quality Objective, June 2008.

## EXHIBIT A.1. SITE ASSESSMENT/NPL LISTING ACTIVITIES

ACTIVITY	GPRA		PROGRAM	
	APG	APM	TARGET	MEASURE
Pre-CERCLIS Screening Assessment				T
Site Discovery				T
Referred from RCRA				T
Preliminary Assessment (PA) at Non-Federal Facility Sites				T
Federal Facility PA Review				T
Site Inspection (SI) at Non-Federal Facility Sites				T

ACTIVITY	GPRA		PROGRAM	
	APG	APM	TARGET	MEASURE
Federal Facility SI Review				T
Site Reassessment				T
Expanded Site Inspection (ESI) at Non-Federal Facility Sites				T
Federal Facility ESI Review				T
Integrated ESI/Remedial Investigation				T
State Deferral of Non-Federal Facility Sites				T
Other Cleanup Activity				T
Hazard Ranking System (HRS) Package (Non-Federal Facility and Federal Facility)				T
Integrated Removal Assessment & PA at Non-Federal Facility Sites**				T
Integrated Removal Assessment & SI at Non-Federal Facility Sites**				T
Integrated Removal Assessment & Expanded Site Inspection (ESI)**				T
Integrated Removal Assessment and Hazard Ranking System (HRS)**				T
Integrated Removal Assessment and Expanded Site Inspection and Remedial Investigation (ESI/RI)**				T
NPL Listing (Proposed, Final, Removed-From Proposed, Withdrawn)				T
Archive Site				T
Site Unarchived				T
<i>No. of Final Assessment Decisions *</i>	T			

**NOTE:** Accomplishments are pulled from CERCLIS on a semi-annual basis.

*\*Italic text indicates that this activity is a goal or measure that is not specifically defined in the Appendices to the Manual. Data to support reporting of these goals is already included in existing definitions.*

*\*\*Indicates that the action is historical.*

### ***A.E. SITE STATUS INDICATORS***

These site status indicators are entered through the Site Status and Description/Operable Units screen in CERCLIS.

**Archive Indicator** - this checkbox indicates if the site has been archived. NOTE: Indicating that a site has been archived will result in a pop-up message asking the user if they would like to make an NFFA determination at this time. If the user clicks yes, the NFFA flag will be populated and an NFFA date will be system generated. A site cannot be archived if there are any planned or ongoing archive prohibited actions at the site. For a list of archive prohibited actions, refer to the *CERCLIS Archived Sites* QRG.

A site that has been archived represents a site-wide decision that no further interest exists at the site under the Federal Superfund program based on available information. It is a comprehensive decision indicating there are no further Superfund site assessment, remedial, removal, enforcement, cost recovery, or oversight activities being planned or conducted at the site. For more information about archiving sites in CERCLIS, refer to the CERCLIS Archived Sites QRG or the EPA's Refining CERCLIS website at: <http://www.epa.gov/superfund/programs/reforms/reforms/2-4c.htm>

**Archive Date** - this date is system generated with the current date when the checkbox is checked. This field is editable and should reflect the date the site was archived.



**NPL Status** - displays the current NPL Status for the site. User may select from the drop down to enter or change the NPL Status of the site. Regional users have access to change the NPL Status to Not a valid site or incident, Not on the NPL, Addressed as part of an existing NPL site, and Pre-proposed site. All other NPL Status values are added through a database revision and are uneditable.

**Non NPL Status** - displays the current Non-NPL Status for the site. User may select from the drop down to enter or change the Non NPL status of the site. The available non-NPL status values will be limited based on the NPL Status of the site. Regions should update the Non-NPL Status field in CERCLIS as soon as possible following entry of a site assessment action start and/or completion date.

Reporting non-NPL site status information allows EPA to clearly identify the progress a site has made in the Site Assessment Pipeline at any given time. For a list of Non-NPL Status values and more information about entering non-NPL status values in CERCLIS, refer to the *Reporting Non-NPL Status QRG* and the *Understanding NPL and Non-NPL Status Code Relationships QRG*.

Status Not Specified (SX) is one of the codes available for selection as a Non NPL Status value. Regions may select this code only if no other available Non NPL Status value is appropriate. If selected, the Region should notify the EPA HQ Site Assessment Data Sponsor to determine whether a new Non NPL Status value needs to be created. Regions should review sites with an SX value at a minimum on a semi-annual basis (prior to mid year review, and end-of-year assessment) and update this value as appropriate.

**Non NPL Status Date** - this field is system generated with the current date when the Non NPL status of a site is changed. This field is editable and should reflect the date the non-NPL status of the site changed.

**ERS Exclusion** - this checkbox indicates if the region has made an eligible response site exclusion decision at the site.

Under CERCLA Section 101(41) (C), EPA may exclude sites from the Brownfields eligible response universe if EPA conducts or has conducted a preliminary assessment (PA) or site inspection (SI) and, after consultation with the State, determines or has determined that the site obtains a preliminary score sufficient for possible listing on the National Priorities List or otherwise qualifies for listing on the National Priorities List.

**NOTE:** This checkbox may not be selected if the site NFFA checkbox has been selected. Since NPL sites are excluded from the definition of Eligible Response Sites, HQ will uncheck the ERS Exclusion checkbox when updating CERCLIS for sites that get proposed to the NPL.

NPL sites, Federal facility sites, and sites with planned or ongoing removals are excluded from the definition of ERS sites. For more information regarding making an ERS exclusion at a site, please refer to OSWER Directive 9230.0-170, entitled Regional Determinations Regarding Which Sites are Eligible Response Sites under CERCLA Section 101(41)(C)(i), as Added By the Small Business Liability Relief and Brownfields Revitalization Act.

**ERS Exclusion Date** - this date is system generated with the current date when the checkbox is checked. This field is editable and should reflect the date the site was excluded.

**Final Assessment Decision (FAD)** - this checkbox indicates if a final remedial assessment decision has been made for the site. Regions are responsible for maintaining FAD designations in CERCLIS. The number of FADs is a GPRA goal. HQ will place a check in the FAD checkbox when updating CERCLIS for sites that get proposed to the NPL.

**Final Assessment Decision Date** - this date is system generated with the current date when the checkbox is checked. This field is editable and should reflect the date the final assessment decision was made.

**NFFA** - this checkbox only applies to sites that have been assigned an ERS exclusion decision and denotes that the site requires No Further Federal Action. CERCLA Section 101(41)(C)(i) authorizes EPA to make a site which was previously excluded as an Eligible Response Site, because it had obtained a preliminary score sufficient

for possible listing, an Eligible Response Site again when EPA determines that no further federal action will be taken (NFFA). NOTE: Sites that have a NPL status of F or P are not eligible for No Further Federal Action. In addition, if a site has any planned or ongoing enforcement, cost recovery or removal activities, the user will not be allowed to make an NFFA determination.

**NOTE:** This checkbox may not be selected if the ERS Exclusion checkbox has been selected.

For more information regarding NFFA decisions, please refer to OSWER Directive 9230.0-170, entitled Regional Determinations Regarding Which Sites are Eligible Response Sites under CERCLA Section 101(41)(C)(i), as Added By the Small Business Liability Relief and Brownfields Revitalization Act.

**NFFA Date** - this date is system generated with the current date when the checkbox is checked. This field is editable and should reflect the date the determination that no further federal action would be taken at the site.

### ***A.F. DATA QUALITY***

The Regions should assure that their site assessment information is complete, current, consistent and accurate. To assist the Regions in this determination, data quality reports for Superfund site assessment information in CERCLIS are available through the national Superfund eFacts application. ReportLink may also be used to hold data quality reports. The site assessment data quality report in Superfund eFacts is used to monitor progress in correcting site assessment data in CERCLIS.

### ***A.G. ACTION QUALIFIERS FOR SITE ASSESSMENT ACTIONS***

Site screening and assessment decisions are made upon completion of each site assessment action. These decisions identify how the Region will proceed with site response and are recorded in CERCLIS as action qualifiers (Qualifiers).

#### **A.G.1. No Further Remedial Action Planned (NFRAP)**

No further Superfund remedial assessment work will be taken at a site with a NFRAP determination (Qualifier = (N) No Further Remedial Action Planned) unless new information warranting such action is received by EPA. NFRAP decisions should not be confused with archiving. NFRAP decisions are made from a site assessment perspective only; they simply denote that further Superfund NPL assessment work is not required based on currently available information. In contrast, the archival of CERCLIS sites is made only when no further Superfund interest exists at a site. This means that sites are not archived if there are planned or ongoing removal or enforcement activities or if other Superfund interest still exists, even if a NFRAP decision was made during site assessment activities.

#### **A.G.2. Further Evaluation**

Upon completion of each site assessment action, the Region may determine that additional, more complex evaluation activities are required to determine whether or not the site should be pursued for placement on the NPL. A decision to conduct further evaluations at a site is recorded differently in CERCLIS depending on what site assessment activity is being performed.

For PAs, SIs, and Site Reassessment further evaluation is denoted by either making a decision of higher priority (Qualifier = (H) High), lower priority (Qualifier = (L) Low), or recommend the site for HRS scoring (Qualifier = (G) Recommended for HRS Scoring).

For ESIs and ESI/RIs, further evaluation is denoted by the decision of lower priority for further evaluation or to recommend the site for HRS scoring (Qualifier = (G) Recommended for HRS Scoring).

For Other Cleanup Activity actions, further evaluation is denoted by either making a decision of higher priority (Qualifier = (H) High) or lower priority (Qualifier = (L) Low).

Further evaluation activities upon completion of a HRS Package consist of HQ quality assurance and ultimately a decision on whether to propose the site to the NPL (Qualifier = (O) Site is being considered for proposal to the NPL).

### **A.G.3. Perform a Removal**

Upon completion of PAs, SIs, SIPs, ESIs or ESI/RIs, the Region may determine that a time-critical or non-time critical (NTC) removal is necessary. The decision recorded for these actions is Referred to Removal, Needs Further RMDL ASMT (Qualifier = F) or Referred to Removal, No Further RMDL ASMT (Qualifier = W).

### **A.G.4. Defer the Site to RCRA (Subtitle C) or the NRC**

Upon completion of PAs, SIs, or ESIs at non-Federal facilities, or of FF PA Reviews, FF SI Reviews, or FF ESI Reviews at Federal facilities the Region may determine that the site is excluded from Superfund consideration under policy, regulatory, or legislative restrictions and defer it to either the RCRA program (Qualifier = (D) Deferred to RCRA (Subtitle C)) or to the NRC (Qualifier = (DN) Deferred NRC).

### **A.G.5. Sites addressed as part of existing NPL sites**

Upon completion of Site Assessment activities, such as PAs, SIs, ESIs, or ESI/RIs, the Region may decide that a site is best addressed as part of an existing NPL site. This would be done when contamination at a non-NPL site is being addressed by cleanup actions at an existing NPL site. This most frequently occurs at Federal facilities and sites with an area-wide groundwater contamination problem resulting from multiple sources. In this situation, the NPL site is considered the 'parent' and the non-NPL site is referred to as the 'child'. The decision to address a site as part of an existing NPL site requires the following information in CERCLIS:

- Upon completion of the site assessment activity that led to the decision to combine the two sites, the Region should enter a qualifier of 'Addressed as part an existing NPL site' (A) at the child site;
- The 7-digit Site ID number of the parent site must be entered into the Parent Site ID field (Site Parent ID) for the child site;
- The 7-digit Site ID number of the child site must be entered into the Child Site ID field (Site Child ID) for the parent site; and
- The NPL Status for the child site must be changed to 'Site is part of NPL Site' (A).

After a site is collapsed into the parent site, no further response work should be recorded at the child site. Instead, any further response work performed at that site should be recorded under the existing parent NPL site, possibly as a separate operable unit.

### **A.G.6. Sites addressed as part of other existing non-NPL sites**

Upon completion of a site assessment activity, it is also possible for the Region to decide that a site is best addressed as part of another existing non-NPL site. The decision to combine multiple non-NPL sites requires the following information in CERCLIS:

- Upon completion of the site assessment activity that led to the decision to combine the two sites, the Region should enter a qualifier of 'Addressed as part of another non-NPL site' (B) at the child site;

- The 7-digit Site ID number of the parent site must be entered into the Parent Site ID field (Site Parent ID) for the child site;
- The 7-digit Site ID number of the child site must be entered into the Child Site ID field (Site Child ID) for the parent site; and
- The Non-NPL Status for the child site must be changed to 'Addressed as part of another non-NPL site' (B).

After a site is collapsed into the parent site, no further actions should be recorded at the child site. Instead, any further assessment or response work performed at that site should be recorded under the existing parent site. If the parent site becomes a NPL site (NPL Status P, F, D, R, W), CERCLIS should be updated as described in section d. above.

#### **A.G.7. State Deferral Action Qualifiers**

Upon completion of the State Deferral (AQ) action, the outcome (qualifier) of the State deferral must be entered with the completion date. The possible outcomes (qualifiers) at the completion of a State deferral are:

- Region confirmed successful completion (RS)
- Region terminated deferral (RT)

#### **A.G.8. Referred From RCRA Action Qualifier**

Facilities whose owners have demonstrated an inability to finance corrective action are referred to Superfund from RCRA. An action qualifier of Financial (F) should be added for all Referred from RCRA (XR) actions where the site is referred to Superfund due to a failed financial assurance.



- RCRA Deferral Audit
- Superfund Alternative Agreement
- GAO Survey (RCED-99-22A)
- GAO Survey (RCED-99-22B)
- Military Munitions Response Program (MMRP)
- Environmental Justice

### ***A.I. SITE ASSESSMENT CRITICAL INDICATORS***

Critical Indicators are used in CERCLIS as a way to further describe the action/activity at the site. Five critical indicators are being added to further define site assessment actions and replace the Integrated Removal and Remedial Assessment actions. Site Assessment critical indicators are entered on the SCAP Information screen. The critical indicators used by the Site Assessment program are:

- Abbreviated Preliminary Assessment - Available for Preliminary Assessment (PA) actions.
- Integrated Removal and Remedial Assessment (Int Rmvl/Rmdl Assess) - Available for the following actions:
  - Preliminary Assessment (PA);
  - Site Inspection (SI);
  - Expanded Site Inspection (ESI);
  - HRS Package (HR);
  - Integrated ESI/RI (SS); and
  - Removal Assessment (RS)

#### **A.I.1. Pre-CERCLIS Screening Assessments**

Definition:

Pre-CERCLIS screening is the process of reviewing data on a potential site to determine whether it should be entered into the CERCLIS inventory for further evaluation. The process can be initiated through the use of several mechanisms, such as a phone call or referral by a State or other Federal agency. The information/collection process is normally limited to one or two days. Minimal sampling can be performed during the pre-CERCLIS screening action (less than \$2,000 sampling costs per screened site).

A site should not be entered into CERCLIS if:

- It is currently in CERCLIS or has been removed from CERCLIS and no new data warrants re-entry into CERCLIS;
- The site or contaminants found on the site are subject to certain limitations based on definitions in CERCLA;
- A State or Tribal remediation program is involved in response at the site and it is in the process of a final cleanup;
- The hazardous substance release at the site is regulated under a statutory exclusion (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or covered by the Nuclear Regulatory Commission (NRC), or Uranium Mill Tailings Radiation Control Act (UMTRCA), (see CERCLA section 101(22));
- The hazardous substance release at the site is deferred to another authority (e.g., RCRA Corrective Action);
- Site data are insufficient to determine if CERCLIS entry is warranted (i.e., based on potentially unreliable sources or with no information to support the presence of hazardous substances or CERCLA eligible pollutants or contaminants); or

- Documentation clearly demonstrates that there is no potential for a release that could cause adverse environmental or human health impacts.

For more information on pre-CERCLIS screening please refer to Pre-CERCLIS Screening Assessments fact sheet (OSWER 9375.2-11FS). This fact sheet provides the minimum requirements for conducting these types of assessments.

Definition of Accomplishment:

*Pre-Screening Starts* - A pre-screening (Action Name = Pre-CERCLIS Screening) is started when the region begins collecting data and performing other tasks related to completion of the Pre-CERCLIS Screening Assessment Checklist; and CERCLIS contains the actual pre-screening start date (Actual Start) and an action lead of: Fund-Financed (F); EPA-In House (EP); State-Financed (S); Tribal (TR). Pre-CERCLIS screening start dates are not required.

*Pre-Screening Completions* - A pre-screening (Action Name = Pre-CERCLIS Screening) is completed when:

- Pre-CERCLIS Screening Assessment Checklist has been developed by EPA to document the decision and placed in the site file. The Pre-CERCLIS Screening actual completion date is the date the Checklist is finalized; and
- CERCLIS contains the actual Pre-CERCLIS Screening completion date (Actual Complete), a valid lead (Lead), and appropriate values in the NPL and Non-NPL Status fields.

In addition to the pre-screening action, entry of the following information is required:

Sites that require remedial assessment work, or both remedial assessment and removal work

- A Discovery Date on the Add Site screen, which corresponds to the actual completion date of the pre-screening action;
- An NPL Status of Not on the NPL on the Add Site screen;
- A Non-NPL Status of PA Start Needed or Integrated Removal Assessment PA Start Needed on the Site Description/Operable Unit screen.

Sites that require only removal work

- An Initiation Date on the Add Site screen, which corresponds to the actual completion date of the pre-screening action;
- An NPL Status of Not on the NPL on the Add Site screen;
- A Non-NPL Status of Removal Only on the Site Description/Operable Unit screen.

Sites that require no further evaluation beyond the pre-screening

- An NPL Status of Not a Valid Site or Incident on the Add Site screen;
- A Non-NPL Status of Not a Valid Site or Incident, Not a Valid Site - RCRA Lead, Not a Valid Site - NRC Lead, Not a Valid Site - State Lead, or Not a Valid Site - Tribal Lead.

For more information on tracking Pre-CERCLIS Screening activities, please refer to the March 2002 guidance document entitled Data Entry for Pre-Screening Sites.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

All pre-CERCLIS screening activities should be tracked in CERCLIS, including activities at sites not found to be CERCLA-eligible. Sites that are screened out of CERCLIS will be tracked through the Not a Valid Site or Incident values in the NPL and Non-NPL status field. If the decision is made that the site requires NPL assessment and potential cleanup under CERCLA authority, it should be added to the CERCLIS inventory by entering a Discovery Date and valid NPL and Non-NPL Statuses. A Discovery action or date should not be entered into CERCLIS if the site only needs a removal assessment/action and no NPL assessment work is necessary. For these sites with removal-only interest, the Site Initiation Date on the Add Site screen needs to be entered for these sites to be considered part of the CERCLIS inventory. Sites that

are screened out of the CERCLIS inventory should be entered on the Add Site screen with no Discovery or Initiation date, and the NPL status Not a Valid Site or Incident. The region will maintain a record based on a pre-screening action. This is a program measure.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into CERCLIS, the system will ask the user to confirm or change this value as appropriate.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/Date Requirements	Data Must Be Entered By
Action name = Pre-CERCLIS Screening (HX)	Program Measure	F, EP, S, TR	Pre-CERCLIS Screening Assessment checklist.	The date the checklist is final and CERCLIS contains the Pre-CERCLIS Screening completion date, lead, and NPL or Non-NPL status.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

**A.I.2. Referred from RCRA**

Definition:

A site is Referred from RCRA when both RCRA and Superfund programs agree that the site may require additional investigation or cleanup under the Superfund program. Sites are considered for referral to Superfund from RCRA under a number of scenarios, including:

- sites with facilities that ceased treating, storing, or disposing of hazardous waste prior to November 19, 1980 (the effective date of Phase I of the Subtitle C regulations) and to which the RCRA corrective action or other authorities of Subtitle C cannot be applied;
- sites at which only materials exempted from the statutory or regulatory definition of solid waste or hazardous waste are managed;
- contamination areas resulting from the activities of RCRA hazardous waste handlers to which RCRA subtitle C corrective action authorities do not apply, such as hazardous waste generators or transporters, which are not required to have Interim Status or a final RCRA permit; and
- sites having a low priority or questionable enforcement under RCRA, such as non-filers or converters.

Further, facilities whose owners have demonstrated an inability to finance corrective action are referred to Superfund from RCRA.

Appropriate documentation must exist and be signed by both programs that in fact RCRA has turned the site over to Superfund, and Superfund has accepted the site. All sites referred to Superfund from RCRA must have a Referred from RCRA action and actual completion date documented in CERCLIS.

Definition of Accomplishment:

A site referred from RCRA is considered complete the date the region received the paperwork that documents the decision that the site warrants Superfund NPL assessment and/or potential cleanup attention is entered. The Referred from RCRA date is entered as the completion (actual completion) at the site. Valid leads for Referred from RCRA actions include: Fund-Financed (F) and EPA-In House (EP). An action qualifier of financial should be added for all Referred from RCRA actions where the site is referred to Superfund due to a failed financial assurance.

Changes in Definition FY 06/07 - FY 08/09:

None.



Special Planning/Reporting Requirements:

Actual start and planning dates are not required for the Referred from RCRA action. An action qualifier of financial should be added to the Referred from RCRA action if the site was referred to Superfund as a result of a failed financial assurance. Special initiative flags of RCRA baseline 2005 and RCRA baseline 2008 have been added to CERCLIS. These fields will be populated and maintained by HQ.

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/Date Requirements	Date Must Be Entered By
Action name = Referred from RCRA	Program Measure	F, EP	Documentation of the site referral from RCRA and that the Superfund accepts the site warrants Superfund NPL assessment and potential cleanup attention.	The date the documentation of the referral from RCRA is received from the regional official and CERCLIS contains the Referred from RCRA actual completion date and lead.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

**A.I.3. Site Discovery**Definition:

Site discovery is the process by which a potential hazardous waste site is entered into the CERCLIS inventory for NPL assessment activities. All sites moving through the NPL assessment process must have a Discovery action and actual completion date documented in CERCLIS. Entry of the site discovery date initiates the NPL assessment process and places the site on the Preliminary Assessment backlog.

Definition of Accomplishment:

Site discovery of non-Federal facilities is the date the region completes the pre-CERCLIS screening activities, and documents the decision that the site warrants Superfund NPL assessment and potential cleanup attention. The site discovery date for Federal facilities is the date the site is formally added to the Federal Facilities Hazardous Waste Compliance Docket indicating Superfund involvement is required. The Site Name and Discovery Date must be entered into CERCLIS for both Federal and non-Federal sites. Valid leads for site discovery actions include: Fund-Financed (F); EPA-In House (EP); State (S), Tribal (TR); and Federal Facility (FF).

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Actual start and planning dates are not required for the Discovery action. The Discovery date is entered through the Add Site screen. The Discovery date will automatically populate the actual completion date for the Discovery action. Regions are now required to enter information on site type at the time of discovery on the Add Site or Site Discovery/Initiation screen. Multiple discovery actions are not allowed. Site discovery is a program measure.

Note: A separate field has been added to CERCLIS to record site initiation dates for removal-only sites. A Discovery action or date should not be entered into CERCLIS if the site only needs a removal assessment/action and no NPL assessment work is necessary. For these sites with removal-only interest, the Site Initiation Date on the Add Site screen needs to be entered for these sites to be considered part of the CERCLIS inventory. The discovery date for sites referred from removal to assessment should be the date the referral decision is made.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into CERCLIS, the system will ask the user to confirm or change this value as appropriate.

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/Date Requirements	Data Must Be Entered By
Action name = Discovery (DS)	Program Measure	F, EP, S, TR, FF	Documentation of the decision that the site warrants Superfund NPL assessment and potential cleanup attention.	The Discovery date is entered through the Add Site screen. The Discovery date will automatically populate the actual completion date for the Discovery action.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered by prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

#### A.I.4. Sites Archived

Definition:

Archiving represents a site-wide decision that no further interest exists at the site under the Federal Superfund program based on available information. It is a comprehensive decision indicating there are no further Superfund site assessment, remedial, removal, enforcement, cost recovery, or oversight activities being planned or conducted at the site. Regions may perform re-evaluation work at a site while it is archived if site conditions change and/or new information becomes available. Sites re-evaluated and determined to need substantial site characterization and/or cleanup work under the Federal Superfund program must be returned to the CERCLIS inventory. Regions may also record general enforcement related activities (e.g. issuance of comfort letter or prospective purchaser agreements) at archived sites. For more information on archiving sites in CERCLIS please refer to EPA's Refining CERCLIS website at:

[url\('http://www.epa.gov/superfund/programs/reforms/reforms/2-4c.htm'\)http://www.epa.gov/superfund/programs/reforms/reforms/2-4c.htm.](http://www.epa.gov/superfund/programs/reforms/reforms/2-4c.htm)

*Backlogs:* The Archive site backlog consists of the potential archive candidate sites described below.

Definition of Accomplishment:

An archive decision is recorded in CERCLIS at the site level. To receive credit for an archive decision, the Archive Indicator (Archive IND) must be checked, and the Archive Date entered on the Site Status and Description/Operable Units screen. A note must be prepared and placed in the site file explaining that no further Federal Superfund interest exists at the site based on available information. Since archiving is a comprehensive decision, the note must represent the interests of the appropriate regional business units (e.g., site assessment, removal, etc.), including the regional RCRA program for archive designations based on site deferral to RCRA. Regions should also consult with State and/or Tribal partners prior to making an archive designation to ensure any issues related to archiving are considered and handled appropriately. The date of the note is the Archive Date and entering this date automatically generates the Archive Indicator in CERCLIS.

Although the underlying basis for archiving a CERCLIS site is whether or not Federal Superfund interest exists, several categories of sites are used to generate lists of potential archive candidate sites. Based on review of sites in these categories, regions should update the Archive IND and Archive Date field as appropriate in a timely fashion. These categories are:

- Sites that have completed only the site assessment process and have been given either a No Further Remedial Action Planned (NFRAP) or Deferred decision at the conclusion of the last completed site assessment action, and no other Federal Superfund activity is anticipated;

- Sites that have completed both the removal and site assessment process, or have completed the removal process and require no site assessment work (removal-only sites), and which have completed all related oversight, cost recovery/other enforcement work, and have no further Federal Superfund activity anticipated;
- Sites that have successfully completed State Deferral as described in the May, 1995 OSWER Directive 9375.6-11 titled Guidance on Deferral of NPL Listing Determinations While States Oversee Response Actions and no further Federal Superfund activity is anticipated;
- Sites removed from the proposed NPL or final NPL (e.g., as a result of a lawsuit) that have no further Federal Superfund activity anticipated;
- Child sites addressed as part of a parent NPL or non-NPL site, provided there is no further Federal Superfund interest at the area represented by the child site. Parent non-NPL sites should not be archived until all related child sites have been archived;
- Sites that have been entered into the CERCLIS inventory via entry of a site discovery and/or site initiation date which have not had any work started and, based on review, do not warrant any type of additional Superfund activity. An abbreviated preliminary assessment (PA) should be completed for these sites prior to designating archive status.
- Sites that have completed Other Cleanup Activities by a non-EPA party under the Site Assessment process and have no other Federal Superfund activity anticipated.

As appropriate, sites can be returned to the CERCLIS inventory by deleting the date in the Archive Date field. The Archive Indicator will automatically be deleted. A note explaining why the site was returned to the CERCLIS inventory must be prepared and placed in the site file.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

The Archive Indicator field in CERCLIS is used as a filter on Superfund reports and data sets to delineate whether a site is still in, or has been removed from, the CERCLIS inventory. Planning dates for archiving sites are not available. It is important to note that an archive decision is not the same as a no further remedial action planned (NFRAP) decision. A NFRAP decision is recorded as an Action Qualifier, is made only at the conclusion of a site assessment action, and does not take into account any other Superfund programmatic activity that may be going on at a site such as removals or cost recovery. Archived site is a program measure for both non-Federal and Federal facilities.

The CERCLIS application will prevent adding certain assessment, removal, remedial, and enforcement actions at archived sites. The CERCLIS-Archive Quick Reference Guide lists the prohibited actions. Prohibited actions can be added to a site by either: 1) returning the site to CERCLIS (e.g., substantial site characterization and/or cleanup is needed); or 2) requesting a database revision through Headquarters (e.g., entry of historical data). The restriction will not prevent users from entering action-related data such as start/completion dates, leads, qualifiers, etc., at existing actions. CERCLIS will also prevent the archival of NPL sites (Proposed, Final, and Deleted) and sites having a start and no completion date at an archive-prohibited action.

Archive designations should be made in a timely fashion to accurately portray the status of sites to all users of Superfund Program information. The site assessment program area within CERCLIS's reports module contains reports to help EPA regions maintain the integrity of archive data. The Potential Archive Site Inventory Report lists sites that may be eligible for archival. The Archived-To-Be-Reviewed Site Inventory Report lists sites that may warrant data corrections/updates or return to the active CERCLIS site inventory.

The CERCLIS application now captures archive designations by automatically generating an archive action and completion date when the Archive Date field is populated. In addition, a site unarchived action and completion date is generated when the archive date or indicator is deselected (i.e., a decision is made to unarchive a site). Multiple Archive Site/Site Unarchived actions may be created at a site if the archive indicator is selected, deselected, and then selected again. Each time the archive indicator is selected/deselected at a site, a new Archive Site or Site Unarchived action will be created.

**A.I.5. Preliminary Assessments (PA) at Non-Federal Facility Sites**Definition:

A Preliminary Assessment (Action Name = Preliminary Assessment) is often the first phase of the NPL assessment process following site discovery. The PA is used to determine what steps, if any, need to occur next at the site. Federal, State, and local government files, geological and hydrological data, and data concerning site practices are reviewed to complete the PA report. An on- or off-site reconnaissance also may be conducted, although it is not required.

Regions also have been encouraged to further reduce repetitive site characterization tasks and costs by combining site assessment and removal evaluation activities where warranted by site conditions. An integrated removal assessment and remedial preliminary assessment combines requirements of a both types of assessments into a single report.

There are instances when an Abbreviated Preliminary Assessment (APA) can be performed in lieu of a standard Preliminary Assessment (PA). The October, 1999 Abbreviated Preliminary Assessment fact sheet (OSWER 9375.2-09FS) provides information on conducting APAs and includes a checklist to help site assessors determine whether an APA report is appropriate for a given site. The checklist or an equivalent document can serve as documentation that the APA was completed. The APA checklist or equivalent report must address the requirements set forth in the NCP for conducting remedial preliminary assessments.

Once a site has been entered into the CERCLIS site inventory for remedial assessment, an APA may be performed if the site/release:

- is regulated under a statutory exclusion (e.g., petroleum);
- is subject to certain limitations based on definitions in CERCLA (e.g., naturally occurring substances in its unaltered form);
- can be addressed as part of another site already in CERCLIS;
- will be deferred to another program (e.g., RCRA, NRC, EPA removal) based on existing policy considerations (follow-up confirmation of the deferral is required);
- requires no further remedial assessment; or
- will require a Superfund site inspection.

*Backlogs:* The Preliminary Assessment backlog consists of sites with a Non-NPL Status of either PA start needed or PA ongoing.

Definition of Accomplishment:

*PA Starts* - A PA (Action Name = Preliminary Assessment) is started when the region begins collecting data and performing other tasks related to development of the PA report; or when the region signs a letter, form, memo, or issues a Technical Direction Document (TDD) to the EPA contractor or State/Tribal government (where applicable), requesting performance of a PA at a specific site or group of sites; or when EPA receives written confirmation from a State/Tribal government that the State/Tribal government will conduct the PA; and CERCLIS contains the actual PA start date (Actual Start) and an action lead of: Fund-Financed (F); EPA-In House (EP); State (S); or Tribal (TR). PA start dates are required and are used by HQ as a program measure.

*APA Starts* - An Abbreviated PA is started when the region begins collecting data and performing other tasks related to development of the PA report; or when the region signs a letter, form, memo, or issues a Technical Direction Document (TDD) to the EPA contractor or State/Tribal government (where applicable), requesting performance of a PA at a specific site or group of sites; or when EPA receives written confirmation from a State/Tribal government that the State/Tribal government will conduct the PA.

*PA Completions* - A Preliminary Assessment (Action Name = Preliminary Assessment) is completed when:

- A PA Report has been developed by EPA; or received by the region from the Federal contractor or State/Tribal government; and the appropriate Regional official signs a letter, form, or memo approving the PA report. The PA actual completion date is the date the PA report is approved; and
- CERCLIS contains the actual PA completion date (Actual Complete), a valid lead (Lead), and a decision on whether further activities are necessary in the Qualifier field; and

- The decision is documented by completing the Site Decision Form 9100-3 in CERCLIS or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

A valid decision must be recorded in CERCLIS upon completion of the PA. Please refer to Exhibit A.2 in section A.A.5 for a list of valid qualifiers for this action and a description of each qualifier.

APA Completions - An Abbreviated Preliminary Assessment is completed when an APA checklist or equivalent report has been completed by EPA; or received by the region from the Federal contractor or State/Tribal government; and the appropriate Regional official signs a letter, form, or memo approving the APA report. The APA actual completion date is the date the APA report is approved. APA reports are tracked in CERCLIS by entering a PA action and selecting APA as a critical indicator on the PA action SCAP Information screen.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Regions should attempt to complete PAs at non-Federal Facility sites listed in CERCLIS within one year of the site discovery completion date.

Integrated removal assessment and remedial preliminary assessment reports are tracked in CERCLIS by entering a PA action and selecting INTEGRATED RV/RMDL as a critical indicator on the PA action SCAP Information screen. APA reports are tracked in CERCLIS by entering a PA action and selecting APA as a critical indicator on the PA action SCAP Information screen. PA starts and completions (Actual Start and Complete) are reported site-specifically in CERCLIS. Preliminary Assessment completions at non-Federal Facility sites is a program measure.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into CERCLIS, the system will ask the user to confirm or change this value as appropriate.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action Name = Preliminary Assessment (PA)	Program Measure	F, EP, S, TR	<b>Starts:</b> Letter, form, memo; Technical Direction Document (TDD); Written confirmation from a State/Tribal government that the State/Tribal government will conduct the PA.	<b>Starts:</b> Signed by region. Date TDD is issued. Date EPA receives confirmation.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Action Name = Preliminary Assessment (PA)	Program Measure	F, EP, S, TR	<b>Completions:</b> PA report; Letter, form, or memo approving the PA report; Site decision Form 9100-3 in CERCLIS or equivalent document.	<b>Completions:</b> Signed by the appropriate Regional official.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the end of the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)

#### **A.I.6. Federal Facility Preliminary Assessment Reviews**

Please refer to Appendix D (Federal Facility Response) of the SPIM for a description of this activity.

#### **A.I.7. Site Inspections (SI) at Non-Federal Facility Sites**

##### Definition:

The SI (Action Name = Site Inspection) involves the collection of field data from a suspected hazardous waste site to confirm or deny the presence of contamination and to further characterize contaminants, migration pathways, and background contaminant levels. The SI serves as a further screening activity to determine what steps, if any, need to occur next at the site. Regions should employ Field Analytical Sampling (FAS) techniques wherever practical during conduct of SI activities.

Regions also have been encouraged to further reduce repetitive site characterization tasks and costs by combining site assessment and removal evaluation activities where warranted by site conditions. An integrated removal assessment and remedial site inspection combines requirements of both types of assessments into a single report.

**Backlogs:** The Site Inspection backlog consists of sites with a Non-NPL Status of either SI start needed or SI ongoing.

##### Definition of Accomplishment:

*SI Starts* - A SI (Action Name = Site Inspection) start date at a non-Federal facility site is defined as the date when EPA or the State/Tribal government signs a letter, memo or form approving the site-specific SI work plan, or a Technical Direction Document (TDD) is issued to the contractor at a site (refer to OSWER Publication #9345.1-03 FS for further guidance on defining SI starts) and CERCLIS contains the actual SI start date (Actual Start) and an action lead of: Fund-Financed (F); EPA-In House (EP); State (S); or Tribal (TR). SI start dates are required.

*SI Completions* - A SI (Action Name = Site Inspection) is completed when:

- A SI Report has been generated by EPA; or received by the region from the Federal contractor or State/Tribal government; and the appropriate Regional official signs a letter, form, or memo approving the SI report. The SI actual completion date is the date the SI report is approved; and
- CERCLIS contains the actual SI completion date (Actual Complete), a valid lead (Lead), and a decision on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in CERCLIS or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

A valid decision must be recorded in CERCLIS upon completion of the SI. Please refer to Exhibit A.2 in section A.A.5 for a list of valid qualifiers for this action and a description of each qualifier.

##### Changes in Definition FY 06/07 - FY 08/09:

None.

##### Special Planning/Reporting Requirements:

Planning dates are not required for SIs. Actual start and completion dates are required for SIs. SI starts (Actual Start) and completions (Actual Complete) are reported site-specifically in CERCLIS. Site Inspection starts and completions at non-Federal Facility sites are program measures.

Integrated removal assessment and remedial site inspection reports are tracked in CERCLIS by entering a SI action and selecting INTEGRATED RV/RMDL as a critical indicator on the SI action SCAP information screen.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into CERCLIS, the system will ask the user to confirm or change this value as appropriate.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action Name = Site Inspection (SI)	Program Measure	F, EP, S, TR	<p><b><u>Start:</u></b> Letter, memo, or form approving the site-specific SI work plan, Technical Direction Document (TDD).</p>	<p><b><u>Start:</u></b> Signed by EPA or the State/Tribal government. Issued to contractor</p>	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
			<p><b><u>Completion:</u></b> SI Report and signed letter, form, or memo approving the SI report. Site Decision Form 9100-3 in CERCLIS or an equivalent document.</p>	<p><b><u>Completion:</u></b> Signed by appropriate Regional official.</p>	

**A.I.8. Site Reassessment**Definition:

A Site Reassessment represents the gathering and evaluation of new information on a site previously assessed under the Federal Superfund Program to determine whether further Superfund attention is needed. A Site Reassessment serves as a supplement to previous assessment work, and not as a replacement for traditional assessment activities (e.g., Preliminary Assessment, Site Inspection). The scope of work for a Site Reassessment activity is flexible, but will usually represent a component of a traditional site assessment action. The intent of the Site Reassessment action is to document the expenditure of Superfund resources on older sites where EPA has received new information or learned that site conditions have changed. This action is also used to record further assessment decisions made after reviewing this new site information. A brief summary of work performed as part of the Site Reassessment action and the related site decision as a result of this work must be documented by completing the Site Decision Form 9100-3 in CERCLIS, or an equivalent document. Correction of site disposition decisions (i.e., action qualifiers) based solely on file reviews should be documented using the historical lockout feature in CERCLIS and not as a new Site Reassessment action.

Definition of Accomplishment:

*Site Reassessment Starts* - A Site Reassessment (Action Name = Site Reassessment) start is defined as the date when EPA or State/Tribal government signs a letter, memo or form approving the site-specific Site Reassessment work plan or a TDD is issued to the contractor at a site and CERCLIS contains the actual Site Reassessment start date (Actual Start) and an action lead (Lead) of: Fund-Financed (F); EPA-In House (EP); State (S); or Tribal (TR).

*Site Reassessments Completions* - A Site Reassessment (Action Name = Site Reassessment) is complete when:

- A Site Reassessment report has been developed by EPA, or received by the region from the Federal contractor, or the State/Tribal government, and the appropriate Regional official signs a letter, form, or memo approving the Site Reassessment report. The Site Reassessment actual completion date is the date the Site Reassessment report is approved, and
- CERCLIS contains the actual Site Reassessment completion date (Actual Complete), a valid lead (Lead), and a valid decision on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in CERCLIS or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

A valid decision must be recorded in CERCLIS upon completion of the Site Reassessment. Please refer to Exhibit A.2 in section A.A.5 for a list of valid qualifiers for this action and a description of each qualifier.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Planning dates are not required for Site Reassessment. Actual start and completion dates are required for Site Reassessment. Site Reassessment starts (Actual Start) and completions (Actual Complete) are reported site-specifically in CERCLIS. Site Reassessment starts and completions are program measures for non-Federal facilities.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into CERCLIS, the system will ask the user to confirm or change this value as appropriate.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action Name = Site Reassessment (OO)	Program Measure	F, EP, S, TR	<p><b>Start:</b> Letter, memo, or form approving the site-specific work plan or a TDD is issued.</p>	<p><b>Start:</b> Signed by the EPA or State/Tribal government.</p>	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
			<p><b>Completion:</b> Site Reassessment report; Letter, form, or memo approving the report; Site Decision Form 9100-03, or an equivalent document.</p>	<p><b>Completion:</b> Signed by appropriate Regional official.</p>	

**A.I.9. Expanded Site Inspections (ESI) at Non-Federal Facility Sites**

Definition:

The ESI (Action Name = Expanded Site Inspection) collects additional data beyond that collected in the SI to evaluate the site for HRS scoring. ESIs are reserved for more complex sites that cannot be adequately characterized using standard SI methodologies. Installation of groundwater monitoring wells is typical of activities performed under the ESI.

Regions also have been encouraged to further reduce repetitive site characterization tasks and costs by combining site assessment and removal evaluation activities where warranted by site conditions. An integrated removal assessment and expanded site inspection combines requirements of both types of assessments into a single report.

Regions should employ FAS techniques wherever practical during ESI activities.

Backlogs: The Expanded Site Inspection backlog consists of sites where the Non-NPL Status is either ESI start needed or ESI ongoing.

Definition of Accomplishment:

*ESI Starts* - An ESI (Action Name = Expanded Site Inspection) start is defined as the date when EPA or State/Tribal government signs a letter, memo or form approving the site specific ESI work plan or a Technical Direction Document is issued to the contractor at a site and CERCLIS contains the actual ESI



start date (Actual Start) and an action lead (Lead) of: Fund-Financed (F); EPA-In House (EP); State (S); or Tribal (TR).

*ESI Completions* - An ESI (Action Name = Expanded Site Inspection) is complete when:

- An ESI Report has been developed by EPA; or received by the region from the Federal contractor; or the State/Tribal government; and the appropriate Regional official signs a letter, form, or memo approving the ESI report. The ESI actual completion date is the date the ESI report is approved; and
- CERCLIS contains the actual ESI completion date (Actual Complete), a valid lead (Lead), and a valid decision on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in CERCLIS or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

A valid decision must be recorded in CERCLIS upon completion of the ESI. Please refer to Exhibit A.2 in section A.A.5 for a list of valid qualifiers for this action and a description of each qualifier.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Planning dates are not required for ESIs. Actual start and completion dates are required for ESIs. ESI starts (Actual Start) and completions (Actual Complete) are reported site-specifically in CERCLIS. ESI starts and completions are program measures for non-Federal facilities.

Integrated removal assessment and expanded site inspection reports are tracking in CERCLIS by entering an ESI action and selecting INTEGRATED RV/RMDL as a critical indicator on the ESI action SCAP Information screen.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into CERCLIS, the system will ask the user to confirm or change this value as appropriate.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action Name = Expanded Site Inspection (ES)	Program Measure	F, EP, S, TR	<p><b><u>Start:</u></b> Letter, memo, or form approving the site specific work plan or TDD</p>	<p><b><u>Start:</u></b> Signed by the EPA or State/Tribal government. Issued to the contractor at a site.</p>	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
			<p><b><u>Completion:</u></b> ESI report; Letter, form, or memo approving the ESI report; Site Decision Form 9100-3 in CERCLIS or an equivalent document.</p>	<p><b><u>Completion:</u></b> Signed by appropriate Regional official.</p>	

**A.I.10. Federal Facility SI Reviews**

Please refer to Appendix D (Federal Facility Response) of the SPIM for a description of this activity.

#### **A.I.11. Federal Facility ESI Reviews**

Please refer to Appendix D (Federal Facility Response) of the SPIM for a description of this activity.

#### **A.I.12. Integrated Expanded Site Inspection/Remedial Investigation (ESI/RI) at Non-Federal Facility Sites**

##### Definition:

The integrated ESI/RI (Action Name = ESI/RI) is an assessment consisting of an ESI and a RI. The ESI/RI is used to expedite remedial response by gathering site characterization data common to both ESI and RI activities in one step, thereby expediting the later collection of data when comprehensive RI activities are performed. The goal of ESI/RIs is to save time and costs characterizing sites when compared to the traditional, sequential ESI-NPL Listing-RI process. ESI/RIs facilitate but do not replace RIs, and are recommended at sites where conditions indicate that the HRS score will be above 28.5 and a remedial response will be needed. The RI portion of an ESI/RI is intended to be a site-wide activity. ESI/RIs actions should be entered into CERCLIS at operable unit 00.

ESI/RIs may not always be feasible given known site conditions and activities completed to date. In some cases, it may be more prudent to conduct a separate ESI and RI. The definitions for RI/FS Completion and RI Completion (see definitions in Appendix B) are different from the definition for ESI/RI Completion. The definition of an ESI/RI Completion is the same as that of an ESI Completion. If an ESI/RI action is recorded in CERCLIS, a stand-alone ESI event (Action Name = Expanded Site Inspection) should not be recorded at that site.

Regions also have been encouraged to further reduce repetitive site characterization tasks and costs by combining site assessment and removal evaluation activities where warranted by site conditions. An integrated removal assessment and integrated ESI/RI combines requirements of both types of assessments into a single report.

Backlogs: The ESI/RI backlog consists of sites with a Non-NPL Status of either Integrated ESI/RI start needed or Integrated ESI/RI ongoing.

##### Definition of Accomplishment:

*ESI/RI Starts* - ESI/RI (Action Name = ESI/RI) start date is defined as the date when EPA approves the site-specific ESI/RI work plan and CERCLIS contains the actual ESI/RI start date (Actual Start) and an action lead of: Fund-Financed (F); EPA-In House (EP); State (S); or Tribal (TR).

*ESI/RI Completions* - An ESI/RI (Action Name =ESI/RI) is complete when:

- An ESI/RI Report has been reviewed and accepted by the region and the appropriate Regional official signs a letter, form, or memo approving the ESI/RI report. The ESI/RI actual completion date is the date the ESI/RI report is approved; and
- The following has been recorded in CERCLIS: the actual ESI/RI completion date (Actual Complete); a valid lead (Lead); and a decision on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in CERCLIS or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

A valid decision must be recorded in CERCLIS upon completion of the ESI/RI. Please refer to Exhibit A.2 in section A.A.5 for a list of valid qualifiers for this action and a description of each qualifier.

##### Changes in Definition FY 06/07 - FY 08/09:

None.

##### Special Planning/Reporting Requirements:

Planned start and completion dates are not required for ESI/RIs. Actual start and completion dates are required for ESI/RIs. ESI actions (Action Name = Expanded Site Inspection) should not be recorded

separately in CERCLIS if they are conducted as part of an ESI/RI. ESI/RI starts and completions at non-Federal Facility sites are program measures.

An integrated removal assessment and ESI/RI report is tracked in CERCLIS by entering an ESI/RI action and selecting INTEGRATED RV/RMDL as a critical indicator on the ESI/RI action SCAP Information screen.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into CERCLIS, the system will ask the user to confirm or change this value as appropriate.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action Name = ESI/RI (SS)	Program Measure	F, EP, S, TR	<b>Start:</b> Site-specific ESI/RI work plan.	<b>Start:</b> Approved by EPA.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered by prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
			<b>Completion:</b> Letter, form, or memo approving the ESI/RI report; Site Decision Form 9100-3, or an equivalent document.	<b>Completion:</b> Signed by appropriate Regional official.	

### A.I.13. State Deferral of Non-Federal Facility Sites

Definition:

State Deferral (Action Name = State Deferral) is an administrative mechanism enabling States and Tribes, under their own laws, to respond at sites in the CERCLIS inventory that EPA would otherwise not soon address. Under the State Deferral program, EPA anticipates that responses may be quick and efficient, yet still be protective of the environment and of communities' rights to participate in the decision-making process. Refer to the Guidance on Deferral of NPL Listing Determinations While States Oversee Response Actions (OSWER Directive 9375.6-11, May 1995) for additional information on this program.

Backlogs: The State Deferral backlog consists of CERCLIS sites with a Non-NPL Status of Deferral of NPL listing decision while States oversee response.

Definition of Accomplishment:

*State Deferral Starts* - The State Deferral (Action Name = State Deferral) process start is defined as the date when the Regional Superfund program director and the State program director sign a document deferring the site to the State under the terms established in the deferral guidance. A State Deferral action must be recorded in CERCLIS with an action lead (Lead) of State Deferral (SD). State deferrals are applicable only to non-Federal facility sites that are not on the NPL.

*State Deferral Completions* - The State Deferral (Action Name = State Deferral) completion date is defined as either: 1) the signature date of a formal regional document confirming that the deferral has been completed successfully, or terminating the deferral agreement; or 2) 90 days after the date EPA receives State certification that the deferral has been completed. The outcome (Qualifier) of the State deferral must be entered with the completion date.

Valid decisions (Qualifiers) must be recorded in CERCLIS upon completion of the State Deferral. Please refer to Exhibit A.2 in section A.A.5 for a list of valid qualifiers for this action and a description of each qualifier.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Six SubActions can be entered for the State Deferral action to generically capture the different cleanup phases a site may be undergoing. These SubActions include:

1. Comprehensive Site Investigation (SubAction Name = Comprehensive Site Investigation)
2. Remedy Selection (SubAction Name = Remedy Selection);
3. Design (SubAction Name = Design);
4. Construction (SubAction Name = Construction);
5. Post-Construction Maintenance (SubAction Name = Post Construction Maintenance); and
6. Short Term Cleanup (SubAction Name = Short Term Cleanup)

SubAction start and completion dates and SubAction lead codes are available for documenting the start and completion of the different cleanup phases being conducted at non-NPL sites by non-EPA parties.

Planned start and completion dates are not required for State Deferral actions. Actual start and completion dates are required. Sites successfully completing the deferral process are eligible for archiving (removal) from the CERCLIS inventory. State Deferral starts and completions are program measures.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into CERCLIS, the system will ask the user to confirm or change this value as appropriate.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action Name = State Deferral (AQ)	Program Measure	SD	<b>Start:</b> Document deferring the site to the State.	<b>Start:</b> Signed by Regional Superfund program director and State program director.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
			<b>Completion:</b> Formal regional document confirming that the deferral has been completed successfully, or terminating the deferral agreement; or State certification that the deferral has been completed.	<b>Completion:</b> Signature Received by EPA.	

**A.I.14. Hazard Ranking System Package (HRS)**Definition:

The HRS Package (Action Name = HRS Package) documents a numeric score of the relative severity of a hazardous substance release or potential release based on: (1) the relative potential of substances to cause hazardous situations; (2) the likelihood and rate at which the substances may affect human and environmental receptors; and (3) the severity and magnitude of potential effects. The HRS Package also includes references and documentation in support of the score. The score is computed using the revised Hazard Ranking System (HRS). Regions are responsible for preparing HRS packages for both Federal and

non-Federal facility sites. Regions submit a draft version of the HRS package to HQ for quality assurance review. Regions and HQ work together to address issues and agree on a final version of the HRS package. Based on results of the completed HRS package and other factors, regions determine what next steps, if any, are appropriate for a site (e.g., NPL listing, NFRAP, etc.)

Regions also have been encouraged to further reduce repetitive site characterization tasks and costs by combining site assessment and removal evaluation activities where warranted by site conditions. An integrated removal assessment and HRS Package combines requirements of both types of assessments into a single report.

Backlogs: The HRS backlog consists of sites having Non-NPL Status of either HRS start needed or HRS ongoing.

Definition of Accomplishment:

*HRS Package Starts* - An HRS Package (Action Name = HRS Package) start is defined as the date when EPA signs a memo, form, or letter requesting development of a HRS Package for a specific site and CERCLIS contains the actual HRS Package start date (Actual Start) and a valid action lead of Fund-Financed (F); EPA-In House (EP); State (S); or Tribal (TR). HRS Package start dates are required for both Federal and non-Federal facility sites, and are used to identify the status of sites in the site assessment pipeline and to measure activity durations. Due to the pre-decisional nature of HRS packages, regions may postpone entry of HRS start dates until after the HRS package has gone through HQ quality assurance review or after the site has been proposed to the NPL.

*HRS Package Completions* - An HRS Package (Action Name = HRS Package) is complete when:

- An HRS Package has completed HQ quality assurance review and HQ and the region agree to a final version, or an HRS package has completed regional quality control review and the HRS package will not be submitted to HQ for quality assurance review; and
- The following has been recorded in CERCLIS: the approval date for the final version of the HQ QA reviewed (if submitted to HQ) or regional QC reviewed (if not submitted to HQ) HRS Package date as the actual HRS Package completion date (Actual Complete), a lead (Lead), and a decision on whether further activities are necessary in the Qualifier field. Since HRS packages are pre-decisional, entry of HRS Package completion dates in CERCLIS may be delayed until after the site is proposed to the NPL, if applicable; and
- The decision is documented by completing the Site Decision Form 9100-3 in CERCLIS or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Note: Submission of HRS Packages to HQ for technical assistance does not represent an HRS Package completion.

A valid decision must be recorded in CERCLIS upon completion of the HRS Package. Please refer to Exhibit A.2 in section A.A.5 for a list of valid qualifiers for this action and a description of each qualifier.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

Planned start and completion dates are not required for HRS Packages. Actual start and completion dates are required for HRS Packages. HRS Package starts and completions at both Federal and non-Federal Facilities are program measures.

Integrated removal assessment and HRS Package reports are tracked in CERCLIS by entering an HRS Package action and selecting INTEGRATED RV/RMDL as a critical indicator on the HRS Package action SCAP Information screen.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into CERCLIS, the system will ask the user to confirm or change this value as appropriate.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action Name = HRS Package (HR)	Program Measure	F, EP, S, TR	<b><u>Start:</u></b> Letter, form, or memo requesting site specific development of a HRS Package	<b><u>Start:</u></b> EPA signature.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the site is proposed to the NPL. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
			<b><u>Completion:</u></b> Site Decision Form 9100-3, or an equivalent document.	<b><u>Completion:</u></b> Signed by appropriate Regional official.	

**A.I.15. NPL Listing**Definition:

The NPL is a list of national priorities among the known or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and trust territories. There are three mechanisms for placing sites on the NPL for possible remedial action:

- A site may be included on the NPL if it scores sufficiently high on the Hazard Ranking System (HRS). The HRS serves as a screening device to evaluate the relative threat that uncontrolled hazardous substances pose to human health or the environment. As a matter of Agency policy, those sites that score 28.50 or greater on the HRS are eligible for the NPL.
- Each State may designate a single site as its top priority to be listed on the NPL, regardless of the HRS score.
- Certain sites may be listed regardless of their HRS score, if all of the following conditions are met:
  - The Agency for Toxic Substances and Disease Registry (ATSDR) of the U.S. Public Health Service has issued a health advisory that recommends dissociation of individuals from the release; and
  - EPA determines that the release poses a significant threat to public health; and
  - EPA anticipates that it will be more cost-effective to use its remedial authority than to use its removal authority to respond to the release.

**Backlogs:** In general, the backlog for proposing sites to the NPL consists of sites having a Non-NPL Status of HRS Package Completed - Further Evaluation Needed.

Definition of Accomplishment:

*Proposed NPL Listing* - The process of proposing a site for placement on the NPL is complete (Actual Complete date) when a Proposed Rule proposing the site to the NPL [Action Name = Proposal to NPL] is published in the Federal Register.

*Removal of Proposed NPL Listing* - The process of removing a site from the list of proposed NPL sites starts (Actual Start date) when a proposal to remove the site is published in the Federal Register and is complete (Actual Complete date) when final notice of the removal is published in the Federal Register [Action Name = Removed from the Proposed NPL].

*Final NPL Listing* - The listing process for a site is complete (Actual Complete date) when a Final Rule adding the site to the NPL [Action Name = Final Listing on NPL] is published in the Federal Register.

*Withdrawn from the Final NPL* - The process of withdrawing a site is complete (Actual Complete date) when a Final Rule withdrawing the site [Action Name - Withdrawn from the NPL] is published in the Federal Register.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

HQ will update the following CERCLIS data when Proposed and/or Final NPL rules are published in the Federal Register;

- CERCLIS Site Name;
- Federal Register Site Name (for historical record keeping purposes should the CERCLIS site name change);
- NPL listing action (Proposal to NPL, Removed from Proposed NPL, Final Listing on NPL, and Withdrawn from the NPL);
- NPL listing action actual completion date and action lead of Fund-financed (F);
- The NPL Status of Proposed for NPL (P), Removed from list of proposed NPL sites (R), Currently on Final NPL (F), and Withdrawn from NPL (W);
- Federal Docket Management System (FDMS) number, if not already assigned;
- The FAD Date will be added using the date of NPL proposal (this automatically checks the FAD box);
- The ERS Exclusion will be unchecked (when proposed);
- The Non-NPL Status and date fields will be deleted (when proposed);
- The Federal Register date, volume, and page; and
- The Federal facility status.

NOTE: Further information on Deletion and Partial Deletion from the NPL can be found in Appendix B of this Manual. NPL Listing is a program measure.

Data Entry Timeliness Requirement:

SPIM Action/ Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Proposal to NPL (NP)	Program Measure	F	Proposed Rule proposing the site to the NPL.	Published in the Federal Register.	It is good management practice to enter data regarding the event as soon as practicable after the event occurs. However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day following the end of FYQ1, FYQ2 and FYQ3, and on the tenth business day following the end of FYQ4.)
Removed from the Proposed NPL (NR)			<b>Start:</b> Proposal to remove the site. <b>Complete:</b> Final notice of the removal.		
Final Listing on the NPL (NF)			Final Rule adding the site to the NPL.		
Withdrawn from the NPL (TW)			Final Rule withdrawing the site.		

**A.I.16. Other Cleanup Activity (OCA)**Definition:

This action is used to document cleanup work at non-NPL sites being conducted by non-EPA parties without EPA enforcement or oversight.

Definition of Accomplishment:

*OCA Starts* - An OCA (Action Name = Other Cleanup Activity) start date is defined as the date EPA acknowledges that the site is being cleaned up by a non-EPA party as supported by documentation between EPA and the non-EPA party leading the cleanup. Valid leads for Other Cleanup Activity are: State Enforcement (SE), PRP Lead Under State (SR), State (S), No Fund Money (SN), Tribal (TR), Federal Facility (FF), PRP Response Under State (PS), and PRP (RP).

*OCA FADs* - The site has been cleaned up or is making progress toward cleanup as supported by written documentation (work sharing agreement, site specific progress report, AOC, remedial action plan, VCP/other MOA, etc.) between the non-EPA party and EPA stating that the site has been or is being cleaned up according to appropriate cleanup standards.

*OCA Completions* - An OCA (Action Name = Other Cleanup Activity) completion date is defined as either: 1) the date EPA receives documentation from the non-EPA party that the site has been cleaned up in accordance with all applicable standards and requirements; or 2) the date EPA determines cleanup work will not be completed by the non-EPA party. The date the documentation is received or determination is made is entered into CERCLIS as the actual completion date of the OCA; and

The decision is documented by completing the Site Decision Form 9100-3 in CERCLIS, or an equivalent document. The decision document must be printed, signed by the appropriate regional official, and placed in the site file.

Valid decisions to be recorded in CERCLIS upon completion of the OCA include:

- (H) - High - Higher priority for further assessment; or
- (L) - Low - Lower priority for further assessment; or
- (N) - No further remedial action planned; or
- (D) - Deferred to RCRA (Subtitle C); or
- (DN) - Deferred to NRC; or
- (A) - Site is being addressed as part of an NPL site. A site having an event qualifier of Collapsed should have an NPL Status indicator (Site NPL Status) of A and a valid value in the Site Parent ID field; or
- (F) - Referred to the removal program with further remedial assessment needed; or
- (W) - Referred to the removal program with no further remedial assessment needed.

Changes in Definition FY 06/07 - FY 08/09:

None.

Special Planning/Reporting Requirements:

The following six SubActions can be entered under the Other Cleanup Activity Action to generically capture the different cleanup phases a site may be undergoing.

1. Comprehensive Site Investigation (SubAction Name = Comprehensive Site Investigation)
2. Remedy Selection (SubAction Name = Remedy Selection);
3. Design (SubAction Name = Design);
4. Construction (SubAction Name = Construction);
5. Post-Construction Maintenance (SubAction Name = Post Construction Maintenance); and
6. Short Term Cleanup (SubAction Name = Short Term Cleanup).

SubAction start and completion dates and SubAction lead codes are available for documenting the start and completion of the different cleanup phases being conducted at non-NPL sites by non-EPA parties.

The following action qualifiers are available for these SubActions:

- (H) - High - Higher priority; and
- (L) - Low - Lower priority; and



- (Blank) - No qualifier specified.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into CERCLIS, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

Data Entry Timeliness Requirement:

SPIM Action/Activity	Activity Type	SPIM Lead	Documentation Required	Documentation Approval/ Date Requirements	Data Must Be Entered By
Action name = Other Cleanup Activity (VA)	Program Measure	SE, SR, S, SN, TR, FF, PS, RP	<p><b><u>Start:</u></b> Documentation between EPA and the non-EPA party leading the cleanup.</p>	<p><b><u>Start:</u></b> EPA acknowledges the site is being cleaned up by a non-EPA party.</p> <p><b><u>Completion:</u></b> Date the non-EPA party completes/completed cleanup work at a non-NPL site.</p>	<p>It is good management practice to enter data regarding the event as soon as practicable after the event occurs.</p> <p>However, data must be entered prior to the quarterly pull for the quarter in which the event occurs. (Generally, the quarterly pull occurs on the fifth business day</p>

#### A.I.17. Tribal Inventory Information

##### a. Native American Interest

The Native American Interest checkbox is available on the Add Site screen and Site Status and Description/Operable Units screen. 'Yes' should be selected from the drop down for all tribal sites and indicates that the site is or may be of interest to one or more Native American entities whose members or land is directly affected by the release.

##### b. Associating site to an American Indian Tribe/Alaskan Native Entity

The Select/Associate Tribe screen in CERCLIS is used to identify the specific Indian entity (e.g., American Indian Tribe or Alaskan Native Corporation) entity associated with the site. This screen allows users to associate one or more American Indian tribes and/or Alaskan Native entities to a site. The tribes available for selection represent the official list of federally recognized tribes as defined in the Tribal Identifier Data Standard.

Associating an Indian entity to a site may be done at any point in the pipeline. Users may associate an Indian entity to a site when the site is first added to CERCLIS, when an activity occurs at the site where the Indian entity is the lead or signs an agreement, or at any other time that an Indian entity shows interest in the activities at the site.

##### c. On Tribal Property

The On Tribal Property field is used on the Select/Associate Tribe screen to indicate whether the release is on the Tribe's property. This includes Indian country and any other land owned by an Indian Tribe or an Alaskan Native Corporation.

##### d. TASWER Survey Site

The Special Initiative Indicator "TASWER Survey Site" is populated by HQ and used to track progress on sites included in the Tribal Association for Solid Waste and Emergency Response (TASWER) inventory of Tribal sites submitted to EPA in FY2004.

**e. Tribal Action Lead Codes**

There are two tribal lead codes available for actions on the project schedule: Tribal Lead, Fund Financed (TR) and Special Account Financed Action - Tribal Govt. Action leads are defined on the Project Schedule screen and are specific to an action on the schedule.

**A.J. SUBJECT MATTER EXPERTS**

The following table identifies the subject matter experts for Appendix A: Site Assessment and NPL Listing Decisions.

**EXHIBIT A.3. SUBJECT MATTER EXPERTS**

<b>Subject Matter Expert</b>	<b>Subject Area</b>	<b>Phone #</b>	<b>Email</b>
<b>Randy Hippen</b>	<i>Site Assessment/NPL Listing</i>	(703) 603-8829	<a href="mailto:hippen.randy@epa.gov">hippen.randy@epa.gov</a>
<b>Renee Hamilton</b>	<i>SPIM Lead</i>	(703) 603-9092	<a href="mailto:hamilton.renee@epa.gov">hamilton.renee@epa.gov</a>