



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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U.S. EPA REGION  
WASTE MANAGEMENT DIVISION  
OFFICE OF THE DIRECTOR

OERR Directive 9210.0-01

MEMORANDUM

**SUBJECT:** Transmittal of Guidance for Data Collection at  
State-lead NPL Sites

**FROM:** Stephen D. Luftig, Acting Director  
Office of Emergency and Remedial Response

**TO:** Director, Waste Management Division  
Regions I, IV, V, VII  
Director, Emergency and Remedial Response Division  
Region II  
Director, Hazardous Waste Management Division  
Regions III, VI, VIII, IX  
Director, Hazardous Waste Division  
Region X

PURPOSE

This memorandum transmits guidance for collecting data at National Priorities List (NPL) sites where the CERCLIS lead code is "SN" (State, No Fund Money) or "SR" (PRP Response Under State Order).

BACKGROUND

An audit of FY 1993 CERCLIS data was completed by the General Accounting Office (GAO) last fall. During the course of the audit, GAO discovered data inaccuracies related to State lead NPL sites. In some instances, data for these sites were extremely outdated, and in other cases, sites had not been coded with any previous events when they were already in the RA construction phase. These State-lead sites are on the NPL and therefore, must be tracked accurately.

OBJECTIVE

The objective of this memorandum is to provide guidance to ensure that CERCLIS/WasteLAN contains accurate and timely state lead accomplishments data.

## OERR Directive 9210.0-01

### Guidance for Data Collection at SN and SR Lead NPL Sites

#### Timeframe

The Regions will consult with their state representatives on an **annual** basis to obtain accurate information on SN and SR lead events at NPL sites. To ensure consistency, we are requesting that the information be updated as of September 30 to coincide with the end of the fiscal year. We believe many regions meet with their state representatives throughout the year so this would be the ideal time to collect the data.

#### Data Required

Since these sites do not qualify for SCAP credit, many of the specific data elements associated with SCAP will **NOT** be required. While technical data qualifiers, actual costs associated with events, and planning data are not required, the data would be extremely valuable for future discussions on comparing cleanup at State and EPA sites. Information on State Enforcement activities is not required. However, **the following data elements will be required by operable unit:**

- RV - Start and Complete Dates (Actual)
- RI/FS - Start and Complete Dates (Actual)
- ROD - Complete Date (Actual)
- RD - Start and Complete Dates (Actual)
- RA - Start and Complete Dates (Actual)
- Construction Completion - Sites that are going to be included in the "construction completion" list must have the proper dates and documentation (i.e., Preliminary Close Out Report, Close Out Report, No Action ROD Certification or comparable State document with EPA certification) required of all other sites reaching this milestone.

Since many states do not follow the "standard pipeline process" for addressing their sites, the region will have to work with the state to categorize the site correctly before entering the information in WASTELAN.

#### Dates

State records do not always show the specific date that an event occurred. In many cases, months or even seasons of the year are the best the state can provide. To make sure coding of dates is consistent, please adhere to the following guidelines:

Exact Dates - Use the exact date if provided.

## Dates (cont'd)

Month, Year - Use the last day of the month provided, for example December 1993 would be coded as 12/31/93.

Seasons - Use the last day of the last month of the season of the year.

Fall = 1st Quarter (Oct, Nov, Dec)  
Winter = 2nd Quarter (Jan, Feb, March)  
Spring = 3rd Quarter (April, May, June)  
Summer = 4th Quarter (July, Aug, Sept)

For example, Spring 1993 would be coded as June 30, 1993. A note to the site file should be written explaining how this date was derived.

## Documentation

All data contained in the CERCLIS/WASTELAN database must be documented and state-lead data are no exception. However, the type of documents required to justify a state-lead accomplishment will not exactly coincide with documents required for Fund-lead accomplishments. For example, documentation to support the conclusion of the RI/FS (the ROD) will probably not be available for state lead sites. If EPA and the state agree that a site is at the ROD stage, some type of official state document should be put in the file with a note explaining why EPA feels this justifies the accomplishment. If an official document is not available, a signed letter from the state certifying that the accomplishment is valid would be sufficient.

Maintenance of documentation is the responsibility of either the state or the region. If a state and a region determine that the state is the appropriate entity to maintain documents, then EPA regional files should reflect where the substantiating documents are stored.

## Reports

Headquarters will develop, in conjunction with CERCLIS III, a PC-based report that will allow regions to obtain a list of sites needing updates. The report will also enable the regions to provide states with documentation that CERCLIS/WastelAN has been updated with the correct information.

## INCORPORATION OF REGIONAL COMMENTS

In response to regional comments, we modified the draft guidance to require reporting on an annual basis only. We also included removals and added the option of either the states or the regions maintaining accomplishment documentation. We believe these changes address regional concerns.

## IMPLEMENTATION

Please review the following guidance and begin implementation immediately to ensure that your region can report state lead activities for Fiscal Year 1995.

## CONCLUSION

If you have any questions regarding this guidance, please contact Ed Ziomkoski at (703) 603-8907.

cc: Superfund Program Management Branch Chiefs  
Information Management Coordinators  
Linda Boornazian  
Jim Woolford  
Alan Youkeles