



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

OSWER Directive  
9375.1-4-0  
OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Revisions to Appendix O, "Record of Decision/  
Enforcement Decision Document Guidance" in the  
State Participation in the Superfund Program  
Manual

FROM: Sam Morekas, Chief *S. Morekas*  
State and Regional Coordination Branch

TO: Mailing List

The attached Appendix O has been revised to provide EPA staff with the most current requirements in assembling ROD's and EDD's. Any changes to Appendix O are primarily editorial in nature; no substantive revisions to the text are seen as necessary at this time.

The version of Appendix O which you presently have should be discarded and be replaced with this attachment.

Attachment

1/17/86

CHANGES TO DATE

<u>Date/ Addendum #</u>	<u>Topic</u>	<u>Instruction</u>	<u>Location/Page</u>
6/22/84 #1	Site Closeout	<ul style="list-style-type: none"> <li>. New pages</li> <li>. New page</li> <li>. New pages</li> </ul>	<ul style="list-style-type: none"> <li>. Appendix F, Pages F-22 and 23</li> <li>. Appendix H, Page H-23</li> <li>. Appendix P, Pages P-37-P-47</li> </ul>
	Minority and Women's Business Reporting	<ul style="list-style-type: none"> <li>. New page</li> </ul>	<ul style="list-style-type: none"> <li>. Appendix F, Page F-24</li> </ul>
	Changes to IG Audit	<ul style="list-style-type: none"> <li>. Change "... which must be sent within 120 days." to "... which must be sent within 90 days."</li> <li>. Add, as the second sentence in the paragraph, "In addition, the Award Official will send the State a copy of the final audit report within 15 days of its receipt."</li> <li>. Change "The response must be dispatched within 120 days..." to "The response must be dispatched within 90 days..."</li> </ul>	<ul style="list-style-type: none"> <li>. Appendix C, Page C-12, first complete paragraph</li> <li>. Appendix C, Page C-12 first complete paragraph</li> <li>. Appendix C, Page C-12 footnote</li> </ul>
9/12/84 #2	Quality Assurance Project Plan	<ul style="list-style-type: none"> <li>. New pages</li> </ul>	<ul style="list-style-type: none"> <li>. Appendix L, formerly reserved</li> </ul>
9/28/84 #3	Revised Letter of Credit Procedures Provision	<ul style="list-style-type: none"> <li>. Replacement pages</li> </ul>	<ul style="list-style-type: none"> <li>. Appendix F, Pages F-3 through F-6</li> </ul>

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CHANGES TO DATE (Continued)

<u>Date/ Addendum #</u>	<u>Topic</u>	<u>Instruction</u>	<u>Location/Page</u>
12/10/84 #4	Multi-Site Cooperative Agreements	<ul style="list-style-type: none"> <li>. Replacement pages</li> <li>. Replacement pages</li> <li>. Replacement pages</li> <li>. Replacement pages</li> <li>. New pages</li> <li>. Replacement page</li> <li>. New pages</li> <li>. Replacement pages</li> <li>. New pages</li> <li>. Replacement page</li> <li>. New page</li> <li>. Replacement pages</li> <li>. New page</li> <li>. Change "...at quarterly intervals commencing at the start of the project." to "...within 30 days of the end of the Federal fiscal quarter."</li> <li>. New pages</li> <li>. Replacement pages</li> <li>. New pages</li> <li>. Replacement pages</li> <li>. Replacement pages</li> <li>. New pages</li> </ul>	<ul style="list-style-type: none"> <li>. Table of Contents, Pages xiii through xvii</li> <li>. List of Exhibits, Pages xvii and xix</li> <li>. List of Acronyms, Pages a - through e</li> <li>. Chapter II, Pages II-1 through 6</li> <li>. Chapter II, Page II-7 and Exhibit II-2</li> <li>. Chapter III, Page III-17</li> <li>. Chapter III, Pages III-18 through 27 and Exhibits III-10 and III-11</li> <li>. Chapter IV, Pages IV-5 through IV-7</li> <li>. Chapter IV, Pages IV-8 through IV-11</li> <li>. Chapter V, Page V-7 and V-8</li> <li>. Chapter V, Page V-9</li> <li>. Appendix E, Pages E-1 through E-22</li> <li>. Appendix E, Page E-23</li> <li>. Appendix F, Page F-16, Section K, indented paragraph</li> <li>. Appendix F, Pages F-25 and F-26</li> <li>. Appendix J, Pages J-1, J-2, and J-7</li> <li>. Appendix J, Pages J-8 and J-9</li> <li>. Appendix N, Pages N-1 through N-6</li> <li>. Appendix P, Pages P-1, P-2, and P-47</li> <li>. Appendix P, Pages P-48 through P-51</li> </ul>

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## CHANGES TO DATE (Continued)

<u>Date/ Addendum #</u>	<u>Topic</u>	<u>Instruction</u>	<u>Location/Page</u>
1/4/85 #5	Advance Match	. New pages	. New Appendix S, Pages S-1 through S-9
1/11/85 #6	Site Safety Plan Guidance	. New pages	. Appendix M, formerly reserved
8/2/85 #7	Obtaining Equipment Under a CERCLA Cooperative Agreement	. New pages	. New Appendix T, Pages T-1 through T-15
9/17/85 #8	Intergovernmental Review Procedures	. Replacement page	. Table of Contents, Pages xiii through xix
		. Replacement pages	. List of Exhibits, Pages xx and xxi
	State Cooperative Agreements for Pre-Remedial Activities	. New pages	. Appendix D, Pages D-1 through D-28 Appendix A, formerly reserved
12/18/85 #9	Action Memorandum Guidance	. Replacement pages	. Table of Contents, Pages xiii through xix
		. Replacement pages	. Appendix B, Pages B-1 through B-9
12/20/85 #10	Model Statement of Work for a Remedial Investigation/Feasibility Study	. Replacement pages	. Table of Contents, Pages xiii through xix Appendix E, Pages E-1 through E-21
12/20/85 #11	Site Safety Plan Guidance	. Replacement pages	. Table of Contents, Pages xiii through xix
		. Replacement pages	. Appendix M, Pages M-1 through M-28
1/17/86 #12	Record of Decision (ROD)/ Enforcement Decision Document (EDD) Guidance	. Replacement pages	. Table of Contents, Pages xiii through xix Appendix O, Pages O-1 through O-20

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APPENDIX O

RECORD OF DECISION/ENFORCEMENT DECISION  
DOCUMENT GUIDANCE

OSWER Directive  
9375.1-4-o

APPENDIX O

RECORD OF DECISION/ENFORCEMENT DECISION  
DOCUMENT GUIDANCE

PURPOSE

This appendix has been provided to assist EPA staff in assembling a Record of Decision (ROD) or an Enforcement Decision Document (EDD) by summarizing requirements for RODs/EDDs and illustrating possible ROD/EDD components.

BACKGROUND

A ROD is the document used to document EPA's remedial decision-making process and demonstrate that the requirements of Superfund and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) have been met. An EDD is prepared to obtain EPA approval of a remedial action to be implemented by a potentially responsible party. Pursuant to delegations of CERCLA authority, the Assistant Administrator for Solid Waste and Emergency Response (AA, SWER) selects the remedial action to be implemented at a site or can delegate this responsibility to the appropriate Regional Administrator (RA). Because the ROD will be used as the basis for selection of a remedy, it should provide sufficient information to define the remedial alternatives and the site requirements.

Each ROD/EDD should identify supporting documentation reviewed in selecting the remedy, define the recommended remedy, and document necessary declarations and the approval signature of the appropriate official. The following declarations must be made on the ROD cover page:

- . EPA has consulted with the State before determining the appropriate remedial action (CERCLA section 104[c][2])
- . The action being taken is a cost-effective solution and appropriate when balanced against the need to use Fund money for other sites (CERCLA section 104[c][2]), and
- . The proposed remedy mitigates and minimizes damage to and provides adequate protection of public health, welfare, and the environment.

When off-site disposal is part of the proposed remedial action, the declaration required by CERCLA section 101(24) should be included, as appropriate.

The ROD should also contain a section concerning operation and maintenance (O&M). This section will briefly outline available information about O&M needs associated with the selected remedy and will document approval of EPA's participation in O&M by containing the following:

- . Identification of O&M necessary for the selected remedy, including on-site monitoring
- . Length of time O&M will be required
- . Total estimated O&M costs
- . Identification of the State agency that will be responsible for O&M.

It should also include a recommendation of the period of time (up to a maximum of one year) during which EPA will share in the costs of O&M. In making this recommendation, the RA should consider the individual circumstances of both the site in question and the State involved. Decision criteria may include the type and cost of the O&M, the financial capability of the State, and the importance of the O&M activities to the effectiveness of the remedy. Information contained in this section will also be considered in selection of the remedy, so that the cost-effectiveness of remedial alternatives can be judged on total life-cycle costs.

Additional components of the ROD/EDD package may include:

- . A summary sheet, which can be used to brief the AA (or RA) on the proposed remedy and site requirements
- . A detailed narrative summary describing the site, its enforcement status, and the rationale for recommending a remedial action
- . More detailed background information on the site

- . Other supporting documentation, such as the feasibility study report and a responsiveness summary that contains a review of public inquiries and comments, the issues and concerns raised, and how EPA or the State has responded.
- . A transmittal memorandum, containing recommendations to the AA or RA, and the estimated costs of the recommended remedy, including EPA's share of O&M costs for the recommended period.

The package also should highlight any potential problems or policy issues affecting the decision and should demonstrate close coordination among EPA, the State, and the local community.

#### APPENDIX SUMMARY

This appendix presents several ROD/EDD guidance documents, including:

- . Model ROD Remedial Alternative Selection
- . Model Negotiation Decision Document
- . Model Enforcement Decision Document
- . Summary of Remedial Alternative Selection
- . Model Community Relations Responsiveness Summary
- . Format for Briefing the AA or RA on the ROD.

Additional information concerning the various ROD/EDD processes may be found in Chapter VIII of this manual and in "Preparation of Decision Documents for Approving Fund-Financed and Potentially Responsible Party Remedial Actions Under CERCLA," issued by OSWER on February 2, 1985.

1. MODEL RECORD OF DECISION

Record of Decision  
Remedial Alternative Selection

SITE:     [Site, name, location]

DOCUMENTS REVIEWED

I am basing my decision primarily on the following documents describing the analysis of cost-effectiveness of remedial alternatives for the [site name]:

- [Site name] Remedial Investigation
- [Site name] Feasibility Study
- Summary of Remedial Alternative Selection
- Responsiveness Summary
- [Other relevant reports or documentation of the  
      remedy selection process].

DESCRIPTION OF SELECTED REMEDY

- [List major components of remedy]
- [List operation and maintenance requirements if  
      funding will be requested].

Note:     Care must be taken to list all documents used to reach the final decision. Secondary references included in the listed documents need not be listed here.

DECLARATIONS

Consistent with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), and the National Contingency Plan (40 CFR Part 300), I have determined that the [description of remedy] at the [site name] is a cost-effective remedy and provides adequate protection of public health, welfare, and the environment. The State of [State name] has been consulted and agrees with the approved remedy. [Include the following if appropriate] In addition, the action will require future operation and maintenance activities to ensure the

continued effectiveness of the remedy. These activities will be considered part of the approved action and eligible for Trust Fund monies for a period of [insert funding period not to exceed 1 year].

I have also determined that the action being taken is appropriate when balanced against the availability of Trust Fund monies for use at other sites. [Include the following sentence if remedy involves off-site actions] In addition, the off-site transport, storage, destruction, treatment, or secure disposition [use appropriate wording based on actual remedy] is more cost-effective than other remedial actions, [include the following if appropriate] and will create new capacity to manage hazardous waste, [include the following if appropriate] and is necessary to protect public health, welfare or the environment.

Note: Language for Fund-balancing waivers or waivers from other environmental regulations will be worked out on a site-specific basis.

[Include the following if appropriate.] The State [or EPA] will undertake an additional remedial investigation/feasibility study to evaluate [describe scope of RI/FS]. If additional remedial actions are determined to be necessary, a Record of Decision will be prepared for approval of the future remedial action.

---

Date

---

Assistant Administrator  
Office of Solid Waste and Emergency  
Response  
or  
Regional Administrator

2. MODEL NEGOTIATION DECISION DOCUMENT

Model  
Negotiation Decision Document  
Remedial Alternative Selection  
(Enforcement Confidential)

SITE

- Name
- Location

DOCUMENTS REVIEWED

I am basing my decision primarily on the following documents describing the analysis of the cost and effectiveness of the remedial alternatives for the [site name].

- [Site name] Remedial Investigation
- [Site name] Feasibility Study
- Summary of Remedial Alternative Selection
- Summary of public comment
- Summary of Enforcement Analysis for Negotiation with potentially responsible parties (PRPs)
- Comments from the PRP group on the draft Feasibility Study for the [site name]
- Other relevant reports or documentation of the remedy selection process.

Note: Care must be taken to list all documents used to reach the final decision. Secondary references included in the listed documents need not be listed.

DESCRIPTION OF THE RECOMMENDED REMEDY

- Summarize remedial action (e.g., tank removal, soil removal, grade property, operation and maintenance).

DESCRIPTION OF REMEDY FOR NEGOTIATION WITH PRPs

a. Remedial Alternative

- Other acceptable alternatives or variations to the selected remedy.

b. Negotiation Strategy and Time Schedule

- The Agency recommends [insert settlement negotiation schedule to finalize NDD, initiate negotiations, finalize negotiations, issue a unilateral Administrative Order (AO), effect an AO, and begin a Fund-financed action] for negotiation of a settlement with PRPs.

---

Date

---

Assistant Administrator  
Office of Solid Waste and Emergency  
Response  
or  
Regional Administrator

Attachments:

Enforcement Analysis for Negotiation with PRPs  
[Site name] PRPs list

3. MODEL ENFORCEMENT DECISION DOCUMENT

Model  
Enforcement Decision Document  
Remedial Alternative Selection

SITE

- Name
- Location.

DOCUMENTS REVIEWED

I am basing my decision primarily on the following documents describing the analysis of the cost and effectiveness of the remedial alternatives for the [site name].

- [Site name] Remedial Investigation
- [Site name] Feasibility Study
- Settlement Document
- Other relevant reports or documentation of the remedy selection process.

Note: Care must be taken to list all documents used to reach the final decision. Secondary references included in the listed documents need not be listed.

DESCRIPTION OF SELECTED REMEDY

- List major components of remedy
- List operation and maintenance requirements if funding will be requested
- List other relevant details of the remedy from the Settlement Document.

DECLARATIONS

Consistent with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), and the National Contingency Plan (40 CFR Part 300), I have determined that the [description of remedy] at the [site name] is a cost-effective remedy that provides adequate protection of public health, welfare and

the environment. The State of [State name] has been consulted and agrees with the approved remedy. [Include the following if appropriate.] In addition, the action will require future operation and maintenance activities to ensure the continued effectiveness of the remedy. These activities will be considered part of the approved action. Settlements have been reached between EPA and the responsible parties based on the selected remedy.

I have also determined that the action being taken is a cost-effective alternative when compared to the other remedial options reviewed. [If appropriate, include the following sentence if remedy involves off-site actions.] In addition, the off-site transport, storage, destruction, treatment, or secure disposition [use appropriate wording based on actual remedy] is more cost-effective than other remedial action alternatives considered and will create new capacity to manage hazardous waste, [include the following if appropriate] and is necessary to protect public health, welfare or the environment.

Note: Language for enforcement waivers from other environmental regulations will be worked out on a site-specific basis.

[Include the following if appropriate.] The State, EPA, or PRP will undertake an additional remedial investigation/feasibility study to evaluate [describe scope of RI/FS]. If additional remedial actions are determined to be necessary, a Negotiation Decision Document or a Record of Decision will be prepared for approval of the future remedial action.

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Date

---

Assistant Administrator  
Office of Solid Waste and Emergency  
Response  
or  
Regional Administrator

Attachments:

Summary of Remedial Alternative Selection  
Community Relations Responsiveness Summary  
Settlement Document (Administrative Order or Consent  
Decree)

#### 4. SUMMARY OF REMEDIAL ALTERNATIVE SELECTION

##### Summary of Remedial Alternative Selection

[Site Name]

#### SITE LOCATION AND DESCRIPTION

Describe the site in terms of:

- Location, address (include maps, site plan as appropriate)
- Area of site, topography, located in floodplain
- Adjacent land uses
- Location and distance to nearby populations
- General surface and ground water resources
- Surface and subsurface features (e.g., number and volume of tanks, lagoons, structures, drums).

Note: This section should not exceed two paragraphs.

#### SITE HISTORY

Describe site history in terms of:

- How site was established
- Period of operations
- History of ownership
- Site uses over period of operation, (type of wastes received, treatment/storage/disposal practices)
- Types of permits applied for and/or approved, permitting authority
- History of releases
- Previous response actions (e.g., 311, immediate removal)

- Previous enforcement activities.

Note: This section should not exceed two paragraphs.

#### CURRENT SITE STATUS

Describe results of remedial investigation:

- Describe quantity, types, and concentrations of hazardous substances present (summarize in tables and figures)
- Describe known or suspected risks from substances
- Extent of contamination (lateral and vertical)
- Describe surface and subsurface pathways of migration (e.g., leachability of contaminated soil, soil permeability, depth to ground water)
- Location and number of affected receptors (actual or potential).

Note: This section should summarize only the information related to the proposed remedy and maximize the use of maps and figures.

#### ENFORCEMENT [Used when no negotiations with PRPs]

Describe potentially/current enforcement activities:

- Potential responsible parties
- Results of negotiations
- Filed case
- Recommendation to use Fund.

#### ENFORCEMENT ANALYSIS [Use when negotiations with PRPs are proposed]:

- Discuss PRP interest in undertaking the remedial actions
- Discuss the expectation for successful negotiations and the recommended maximum duration of negotiations
- Describe the flexibility (if any) that the Region feels is appropriate for negotiating

- Analyze the technical differences between the cost-effective remedy and remedies proposed by PRPs.

#### ALTERNATIVES EVALUATION

Describe if actions are source control or off-site measures (40 CFR Part 300.68(d))

Describe results of feasibility study:

- Identify public health and environmental objectives (if possible, describe which objectives are for public health protection and which are for environmental protection)
- List all alternatives considered (a no-action alternative must be included)
- Identify an on-site alternative that fully complies with other appropriate environmental laws (e.g., RCRA, TSCA)
- Describe the alternative screening process (must be consistent with 40 CFR Part 300.68(g)). Alternatives screened generally do not need to be described separately
- Briefly explain why alternatives were eliminated during screening; if no-action was eliminated, provide justification
- Describe detailed analysis of final alternatives (must be consistent with 40 CFR Part 300.68(h)), discuss factors used to evaluate effectiveness and results of evaluation
- Explain why alternatives are recommended (must be consistent with 40 CFR Part 300.68(i))
- List alternatives with cost estimates (capital, O&M and present worth) for comparison with effectiveness evaluation.

Note: This section should briefly summarize the above information.

#### COMMUNITY RELATIONS

- Briefly describe the community's level and nature of concerns or support for each alternative.

#### CONSISTENCY WITH OTHER ENVIRONMENTAL REQUIREMENTS

- Identify technical requirements of other environmental laws and regulations that could apply to the final site actions (e.g., RCRA, TSCA, CWA, floodplain management)
- Describe the alternative that would satisfy the appropriate technical requirements (if an alternative was not developed during the feasibility study, one must be developed for this analysis)
- Use regulatory compliance alternative as a baseline to compare other alternatives
- If recommended alternative does not comply, describe the differences (e.g., liner/leachate collection is not provided for on-site containment)
- Describe key requirements with which alternatives will comply [e.g., RCRA ground water monitoring plan, floodplain assessment (Executive Order 11988), PCB disposal requirements].

Note: This section should briefly summarize the above information. If a waiver for compliance with other environmental requirements is being requested, explain the basis for approval.

Any regulatory determinations, waivers or findings that the Regional Administrator determines is necessary (e.g., alternative concentration limit for ground water contamination in accordance with 40 CFR Part 264.94(b) of RCRA regulations).

#### RECOMMENDED ALTERNATIVE

- Reference 40 CFR Part 300.68(i) description of cost-effectiveness
- Describe how the recommended alternative meets the cost-effectiveness requirement

- Compare recommended alternative to other alternatives, and explain why other alternatives are not cost-effective (e.g., cost, reliability, less than adequate public health protection)
- Prepare tabular summary of alternatives
- Discuss justification for Fund balancing, if appropriate
- Summarize capital and O&M costs of alternative
- Attach appropriate tables or figures describing alternatives.

#### OPERATION AND MAINTENANCE (O&M)

- Describe projected O&M activities required to ensure effectiveness of remedy, including on- and off-site monitoring plans
- List estimated annual O&M costs and durations
- Describe State's funding mechanism and identify the State agency responsible for O&M (where the recommended remedy includes permanent relocation, the relocation responsibilities must be clearly delineated and the State must commit to its responsibilities in its concurrence letter).
- Include the recommended level of EPA funding and time period for O&M activities (not to exceed 1 year after the completion of construction).

#### SCHEDULE

List key milestones and dates for project implementation:

- Complete Enforcement Negotiations
- Approve Remedial Action (sign ROD)
- Award/Amend Cooperative Agreement for Design
- Award Superfund State Contract (and IAG) for Design
- Start Design

- Complete Design
- Award/Amend Cooperative Agreement for Construction
- Award/Amend Superfund State Contract (and IAG) for Construction
- Start Construction
- Complete Construction.

FUTURE ACTIONS

Describe future remedial activities that are required to complete site response:

- Additional RI/FS projects
- Second operable unit (e.g., for ground water mitigation)
- Long-term O&M to maintain effectiveness of remedy.

5. MODEL COMMUNITY RELATIONS RESPONSIVENESS SUMMARY

Community Relations Responsiveness Summary  
[Site Name]

INTRODUCTION

The responsiveness summary documents for the public record:

- Concerns and issues raised during remedial planning
- Comments raised during the comment period on the feasibility study
- How EPA or the State considered and responded to these concerns.

CONCERNS RAISED PRIOR TO THE FEASIBILITY STUDY COMMENT PERIOD

Briefly describe:

- Major concerns and issues raised by State and local officials, potentially responsible parties, and citizens. The level of concern over each of the major issues should be discussed. Include the number of times a concern was raised, the number of people raising the concern, and names of individuals or groups raising concerns and issues, when appropriate.
- Activities conducted by EPA or the State to elicit citizen input and to address specific concerns and issues; for example, small group meeting, news conference, and progress reports.
- Changes in any remedial planning activities as a result of concerns raised.

CONCERNS RAISED DURING THE COMMENT PERIOD

Briefly describe comments on the feasibility study made by local officials, potentially responsible parties and citizens:

- Categorize comments by major issue or topic addressed.

- Summarize comments under the categories as completely as possible. Do not be so brief that the essence is lost. For example, "concern about health effects" is not specific enough. Which health effect is the community worried about?
- Discuss the level of concern over each of the major issues. Include how many times the comment was raised and the number of people raising the concern. Include names of individuals and groups raising concerns and issues, when appropriate.
- Discuss when the comment period started and stopped. Mention when, where, and level of attendance at public meeting, if held.

#### RESPONSE TO COMMUNITY CONCERNS

Explain Agency response:

- Note whether staff met with concerned citizens or conducted other communication activities during the comment period, such as a public meeting, or availability of technical staff to respond to questions
- Document any modifications or changes in the remedial alternative as a result of comments.
- Give the reasons for rejecting the community's or potentially responsible party's preferred alternative if the Agency's selected alternative is different. The citation of "CERCLA" alone does not explain the Agency's rationale. A more detailed explanation is required.
- Document in detail any alternatives provided by the public or potentially responsible parties which are not evaluated in the feasibility study.
- Include any letters, reports, etc., received from potentially responsible parties.

#### REMAINING CONCERNS

Briefly explain:

- Any areas of community concern that require Agency attention during remedial design and construction

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- How EPA or the State intends to resolve any outstanding concerns.

6. FORMAT FOR BRIEFING THE REGIONAL [ASSISTANT] ADMINISTRATOR

Format for Briefing the Regional [Assistant] Administrator  
Record of Decision  
[Site Name]

PURPOSE

- . The purpose of this Record of Decision (ROD) is to select the appropriate remedial action at the [site name] that is consistent with the requirements of CERCLA and the NCP. The Regional [Assistant] Administrator has been delegated the authority for that approval.

ISSUE

- [Discuss general issues that the RA or AA should be award of]
- . [State and local officials and community interest and concerns]
- . [Federal facility or Federal generator]
- . [RCRA issues for on-site actions]
- . [State cost share, flood plain construction, new technologies, other issues]
- . [RC or OGC concurrence or concerns]

MAIN POINTS

- . [Brief summary of site history]
- . [Brief summary of site description]
- . [Summary of previous and current response actions]
- . [Enforcement status]
- . [Objectives of proposed remedial action]
- . [Discuss Tabular Summary of Cost-Effectiveness Analysis including:]

- [Alternatives and Costs]
- [Public health, environmental, and technical considerations]
- [Public comments]
- [Recommended cost-effective alternative]
- [Waivers from other environmental programs, if necessary].

Note: This section should summarize only the information related to the proposed remedy.

[Future remedial actions needed to complete site cleanup]

[Summary charts and graphics - effective charts and graphics include:]

- Aerial photo showing key features
- Site map and/or aerial photo showing proposed actions
- Table of final alternatives listing the alternatives, capital, O&M and present worth costs, and public health, environmental, technical and community considerations (see samples in Summary of Remedial Alternative Selections).

#### NEXT STEPS

	<u>Action</u>	<u>Date</u>
.	RA or AA, OSWER approves ROD	
.	[Amend/award CA, SSC, IAG]	
.	[Sign PR]	
.	[Design remedy]	
.	[Implement remedy]	

Note: The Executive Summary should generally be limited to 3-5 pages, excluding charts and graphics.