



DIRECTIVE NUMBER: 9318.0-04

TITLE: Coordination between Regional Superfund Staffs
and OEA Regional Counterparts on CERCLA Actions

APPROVAL DATE: October 29, 1984

EFFECTIVE DATE: October 29, 1984

ORIGINATING OFFICE: OERR/

☒ **FINAL**

☐ **DRAFT**

STATUS:

REFERENCE (other documents):

OSWER OSWER OSWER
/E DIRECTIVE DIRECTIVE D



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON D C 20460

OCT 29 1984

OSWER Directive 9318.0-04

MEMORANDUM

SUBJECT: Coordination between Regional Superfund Staffs and
OFA Regional Counterparts on CERCLA Actions

FROM: William N. Hedeman, Director
Office of Emergency and Remedial Response

Allan Hirsch, Director
Office of Federal Activities

TO: See Addressees

The purpose of this memorandum is to encourage coordination between the Regional Superfund staffs and Office of Federal Activities (OFA) Regional counterparts in carrying out CERCLA actions. It is a follow-up to the August 22, 1984 memorandum (attached) sent from Josephine Cooper, Assistant Administrator for External Affairs, and Lee Thomas, Assistant Administrator for Solid Waste and Emergency Response, to the Regional Administrators emphasizing Headquarters' support for such an arrangement.

In carrying out Superfund remedial actions, it is EPA's policy to provide opportunity for public review and to follow procedures that are functionally equivalent to those afforded by the National Environmental Policy Act (NEPA). It is also our policy to comply substantively with other environmental statutes and Executive Orders such as the Endangered Species Act, National Historic Preservation Act, Floodplain Management Executive Order (EO11988) and Protection of Wetlands Executive Order (EO11990) where feasible and appropriate. OFA's Regional counterparts have the expertise to assist the Superfund staffs in meeting these requirements.

Another area in which OFA Regional counterparts interrelate with the Superfund program is in the review of environmental impact statements (EISs) prepared by other federal agencies on proposed actions that would have an affect on the environment. In some circumstances, these proposed federal actions directly relate to remedial actions on federal facilities involving hazardous substances, pollutants, and contaminants, and should be reviewed by Regional Superfund staff to ensure consistency in Agency positions. These EISs also can provide a valuable source of information to Regional Superfund staff on certain types of remedial actions being contemplated that relate to similar circumstances in the Superfund program.

We would like to encourage development of a close working relationship between these staffs. This would be of benefit in identifying sites where compliance with these statutes and Executive Orders would apply; in determining what procedures and analyses should be carried out; in determining the alternatives and mitigating measures that should be considered; and in sharing information developed by other federal agencies in the EIS process.

We urge you to begin exploring mechanisms to implement such an arrangement. One way to begin is to notify OFA Regional counterparts early in the fiscal year about sites in the Regions which will be targeted for CERCLA action. This can be accomplished through three mechanisms which are part of the framework of the Superfund planning process:

- Review of the National Priorities List (NPL), which is a list of over 400 hazardous waste sites targeted for clean-up by Federal and State governments under CERCLA. Sites on the list are candidates for remedial or enforcement action.
- Review of the Site Management Plan (SMP), which provides estimated dates on when clean-up activities will begin on sites listed on the NPL, proposed for inclusion on the NPL, or listed as Dioxin Tier 1 or 2 sites.
- Review of the Superfund Comprehensive Accomplishment Plan (SCAP) which is a summary of all sites-related activity in a Region planned for the upcoming fiscal year. For removal activities, the annual plan sets targets for removals at NPL and non-NPL sites. Remedial, enforcement and community relations activities are identified on the plan by site name, State, activity type, expected start date, estimated cost, designation of the lead organization and other relevant information.

We encourage you to support this effort. Later in the fiscal year, we anticipate surveying the Regions to determine how this coordination is working and methods to improve program implementation. Should you have any questions on this matter please contact Anne Miller of the Office of Federal Activities (382-7063) or Tom Sheckells of the Office of Emergency and Remedial Response (382-2339).

Attachment

Addressees

Region I

Merrill Hohman, Director
Waste Management Division

David Fierra, Director
Water Management Division

Region II

William J. Librizzi, Director
Office of Emergency and Remedial Response

Herbert Barrack, Assistant Regional
Administrator for Policy and Management

Region III

Stephen R. Wassersug, Director
Hazardous Waste Management Division

Dr. Alvin R. Morris, Assistant Regional
Administrator for Policy and Management

Region IV

Thomas W. Devine, Director
Air and Waste Management Division

Howard D. Zeller
Assistant Regional Administrator
for Policy and Management

Region V

Basil G. Constantelos, Director
Waste Management Division

Charles H. Sutfin, Director
Water Division

Region VI

Allyn M. Davis, Director
Air and Waste Management Division

Russell F. Rhoades, Director
Environmental Services Division

Region VII

David Wagoner, Director
Air and Waste Management Division

Susan Gordon
Assistant Regional Administrator
for Policy and Management

Region VIII

Robert L. Duprey, Director
Air and Waste Management Division

Jack Hoffbuhr
Assistant for Policy and Management

Region IX

Harry Seraydarian, Director
Toxic and Management Division

Charles Murray
Assistant Regional Administrator
for Policy and Management

Region X

Chuck Findley, Acting Director
Air and Waste Division

Robert S. Burd
Director, Water Division