



DIRECTIVE NUMBER: 9203.1-03A

TITLE: Exercising Flexibility Through the Superfund  
Accelerated Cleanup Model (SACM)

APPROVAL DATE: 10/26/92

EFFECTIVE DATE: 10/26/92

ORIGINATING OFFICE: OERR

FINAL

DRAFT

LEVEL OF DRAFT

A — Signed by AA or DAA

B — Signed by Office Director

C — Review & Comment

REFERENCE (other documents):

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**OSWER OSWER OSWER**  
**DIRECTIVE DIRECTIVE**

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United States Environmental Protection Agency  
Washington, DC 20460

# OSWER Directive Initiation Request

1. Directive Number  
9203.1-03A

## 2. Originator Information

Name of Contact Person Betti VanEpps	Mail Code 5201G	Office OERR	Telephone Code 260-9760
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## 3. Title

Exercising Flexibility Through the Superfund Accelerated Cleanup Model (SACM)

## 4. Summary of Directive (include brief statement of purpose)

The purpose of this memo is to reaffirm the Office of Solid Waste and Emergency Response commitment to support Regional offices in soundly-based decision making while implementing the Superfund Accelerated Cleanup Model (SACM).

## 5. Keywords

SACM, CERCLA, and NCP

## 6a. Does This Directive Supersede Previous Directive(s)?

No  Yes What directive (number, title)

## b. Does It Supplement Previous Directive(s)?

No  Yes What directive (number, title)

## Draft Level

A - Signed by AA/DAA  B - Signed by Office Director  C - For Review & Comment  D - In Development

8. Document to be distributed to States by Headquarters?  Yes  No

## This Request Meets OSWER Directives System Format Standards.

## 9. Signature of Lead Office Directives Coordinator

*Betti VanEpps*

Date  
12/22/92

## 10. Name and Title of Approving Official

Date

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VE DIRECTIVE DIRECTIVE DIRECTIVE



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

OCT 26 1992

OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSE

**VERY IMPORTANT---PLEASE DISTRIBUTE TO ALL STAFF**

OSWER DIRECTIVE NO. 9203.1-03A

MEMORANDUM

SUBJECT: Exercising Flexibility Through the Superfund  
Accelerated Cleanup Model (SACM)

FROM: Don R. Clay  
Assistant Administrator

TO: Addressees

The purpose of this memo is to reaffirm the Office of Solid Waste and Emergency Response commitment to support Regional offices in soundly-based decision making while implementing the Superfund Accelerated Cleanup Model (SACM).

At the April SACM planning meeting, I offered Headquarters support to the Regions in making decisions that will improve the Superfund program through SACM. Our new Superfund model is being implemented at a rapid pace, and I am pleased with the direction it is taking. SACM is the way we will be doing business in the future, and although it is exciting and promising, it also poses certain challenges. Any time major changes are implemented, decisions must be made and actions must be taken in order to improve the efficiency of the program. Yet, we must also be conscious of the legal boundaries of CERCLA and the NCP. In order to ensure that SACM actions are fully supported, OSWER has issued jointly with the Office of General Counsel Directive No. 9203.1-03, "Guidance on Implementation of the Superfund Accelerated Cleanup Model (SACM) under CERCLA and the NCP".

Using this directive, I urge Regional personnel to take full advantage of the flexibility that the NCP offers to streamline the program to provide risk-based cleanups at the greatest number of sites; this could include development of consolidated site assessments, the early start-up of RI/FS's at likely NPL sites, and the increased use of removal authorities to more expeditiously address sources of contamination. The Office of Regional Counsel Regional Decision Team (RDT) representative will be essential in identifying the flexibility within the NCP, and ensuring that such flexibility is exercised in a manner that does not pose unacceptable litigation risks. I also urge you to use your discretion and sound judgement in program innovations. The RDT meetings will be an appropriate forum to discuss these types

of issues since the team is made up of experts with cross-program skills.

Further, revision of guidances is underway, and draft "short sheets" have been sent for Regional comment. We have also met with the Office of Inspector General (OIG) to fully apprise them of SACM developments. We have informed the OIG that SACM expedites the Superfund process using the flexibility within our authority per the OSWER/OGC directive, without creating the inconsistencies with the NCP that have been identified in previous audits.

We must continue the communication between Regions and Headquarters on the SACM issues. The benefits from this type of dialogue were clearly seen at the National SACM Meeting held in August. Keep in mind that we are all on the same team, working towards the same goals. I stand ready to support you in taking advantage of the flexibility in the regulations in order to make soundly-based decisions to implement SACM.

Addressees:

Regional Administrators, Regions I-X  
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  
Director, Environmental Service Division  
Regions I, VI, VII  
Regional Counsel, Regions I-X

cc:

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Lisa Friedman, OGC  
Henry Longest, OERR  
Bruce Diamond, OWPE  
Tim Fields, SRO  
Walt Kovalick, TIO

**bcc: Regional Removal Managers, Regions I-X**  
**Regional Waste Management Branch Chiefs, Regions I-X**  
**Larry Starfield, OGC**  
**Larry Reed, OERR, HSED**  
**Tom Scheckells, OERR, OPM**  
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