



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

1301 Constitution Ave NW  
OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSE

**OSWER DIRECTIVE 9200.04-13  
(PB94-963321; 540F-94/005)**

**MEMORANDUM**

**SUBJECT:** Management of Records of Decision (RODS) To  
Facilitate Public and Agency Access

**FROM:** Henry L. Longest II, 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 directive creates a streamlined, centralized system for collecting and providing agency and public access to Records of Decision (RODS) by utilizing the central services provided to the Office of Emergency and Remedial Response under the NTIS/Superfund Partnership Interagency Agreement.

**BACKGROUND:**

The National Technical Information Services (NTIS) is a Federal agency in the U.S. Department of Commerce, mandated under the American Technology Pre-eminence Act of 1993 (APTA) to collect and disseminate all scientific, policy and technical information products produced by government agencies. Since 1991, Superfund has piloted an Inter-Agency Agreement with them to publish, disseminate and manage the National Superfund Information Products Collection. Under this partnership, OERR and OWPE have experienced a 75% reduction in the number of Headquarters-managed FOIA's requesting publicly available documents, while materially improving public access. It is now

possible to include Regional Superfund programs in this innovative, resource conserving partnership.

NTIS is a unique Federal agency, designated by law as a clearinghouse for scientific, technical and engineering information. The law also directs NTIS to recover its cost from the sale of its products and services. It is sustained only by its customers, and over the past five years, public users of Superfund documents have formed a significant portion of its customer base.

Signed RODS represent a critical, tangible product in the implementation of the national Superfund program. They are of vital interest not only to the originating Region, but also to sister Regions and to Headquarters, where timely entry in the RODS data base can provide automated access to searchable data. Many program offices, including those which maintain data bases such as Envirotex, also maintain hard copy collections which form the core of a Users' Library.

At NTIS, RODS are best-sellers, and, as partners in the distribution of Superfund documents, they are anxious to be able to offer a complete, high-quality collection. With such availability, most of the Regional and Headquarters FOIAs for RODS could be referred to NTIS, at a great savings of time and resources for client and agency. It is therefore necessary that a simple, fool-proof system be implemented to ensure that a high quality copy of every signed ROD is available, upon signature, nationally, from a single centralized location.

#### **IMPLEMENTATION:**

We asked the new Superfund Document Center, now operated by Federal NTIS employees, working on-site in the OERR Office of Program Management (OPM), to create a simple system. A team, chaired by Mike Cullen, Director, Management Systems Development Staff, has devised a two-phased approach. The first, and most critical, deals with the collection and dissemination of hard copy; the second, longer-term initiative deals with improvement in quality, access and completeness of the RODS Data Base.

This directive addresses the collection of the hard copies on which the data base ultimately depends. **The system, described on page 4 of this Directive, should be fully implemented in all Regions by August 1, 1994.** It is based on the premise that a ROD is a "Superfund Publication," and as such, is part of the National Superfund Collection, maintained and disseminated through the Superfund/NTIS Partnership. Classifying RODS this way opens a variety of attractive, resource-saving services to the Regions.

#### **ACTION:**

**We are asking each Region to identify a Regional contact, or**

**contacts (depending on the Regional organizational structure). The designee(s) should understand the internal, Region-specific RODS processing track, and be empowered to work directly with Camille Fields, NTIS On-Site Manager, Superfund Documents Center, to adapt and implement an individual RODS collection plan for your Region. Since Camille will serve as the RODS Regional Client Services Representative, she is empowered to do what is needed to make it easy for you to get your quality-controlled ROD into the Collection and distributed to internal and external users quickly and efficiently. By COB June 30, 1994, please submit the name, title and phone number of your Regional RODS Representative(s) to Camille Fields. Camille may be contacted by FAX (703-603-9133), Phone (703-603-8917) CC-Mail (Camille Fields) or by memo. If you have any questions, suggestions or comments, please contact Betti VanEpps, Superfund Documents Coordinator, at 703-603-8918, CC-Mail (Betti VanEpps) or FAX 703-603-9133.**

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PROCEDURE FOR STREAMLINING  
THE MANAGEMENT AND PUBLIC ACCESS TO  
RECORDS OF DECISION (RODS)

OSWER DIRECTIVE NUMBER 9200.04-13  
June, 1994

INTRODUCTION:

Records of Decision (RODS) are considered "Superfund Publications" and, as such, are of immediate interest to Agency and public customers. The Superfund Documents Center, OERR, will coordinate with a designated representative in each Regional Office to ensure prompt national public access to a complete, quality collection of all signed RODS.

Implementation includes:

- (1) A new procedure for handling all RODS signed after August 1, 1994
- (2) A new procedure for ensuring that the National collection is complete by assisting the Regions to update their collections and the national collection.

(1) Procedure for RODS Signed After August 1, 1994:

- **Immediately upon signature**, a single, first-generation reproduced copy is to be submitted by pouch mail to Camille Fields, Superfund Documents Center, 5201G, in her role as RODS Client Service Representative, for processing and distribution through the NTIS partnership system.

- **Immediately upon receipt**, the RODS Client Service Representative will fast-track the document into NTIS for "HOT STATUS" - 24-hour turnaround - reproduction and distribution to a formal list of regular users, including Regional personnel, if desired. The document is then placed on the NTIS Sales Desk, advertised through the Internet FEDWORLD bulletin board, and sent to regular RODS subscribers. Other public users may immediately purchase the document, and FOIA requestors may, under FOIA rules, be referred there to purchase their copy. (Language is being prepared by the Headquarters FOIA office to assist Regional FOIA Officers in referring these requests to NTIS for fulfillment, and will be provided to the Regions upon completion.)

This distribution will include the Hazardous Site Control Division and the organizational entities which analyze and enter the data into the RODS data base, as well as the Regional Libraries and Hot Line, thus requiring the Region to make only a single contact to accommodate all Headquarters users. At the discretion of the Regions, the Document Center is available to assist in handling the first-time distribution or mailing of the ROD.

(2) MEETING THE QUARTERLY DEADLINE AND COMPLETING THE COLLECTION

Concurrent with the above procedure, at the beginning of each quarter, the Director, MSDS, will provide the RODS Client Services Representative with a Region-specific listing of the RODS expected by the end of the quarter. The RODS Client Services Representative will be empowered to work with the Regional Contact to ensure that all signed RODS are received by the quarterly deadline, providing assistance where appropriate. This service should assist the Regions in meeting the quarterly reporting requirement such that deadlines are no longer missed because of production or reproduction difficulties.

By September 30, 1994, the National Collection should be complete and available through NTIS. Working with NTIS and the RODS Data Base, the RODS Client Services Representative will provide each Region with a list of RODS now in the collection, identify those which are missing, and work with each Regional Representative as appropriate to complete the collection.

(3) OTHER TECHNICAL ASSISTANCE

Under the Partnership, the Regions may avail themselves of access to the Superfund Collection to obtain, through the Superfund Document Center, those RODS required to complete their Regional collection, and should feel empowered to work with the Center to explore creative procedures to satisfy customers' needs, while reducing the Regional photocopy load and outlay of staff resources.

(4) FINE TUNING AND FEEDBACK

Each Region should have begun implementing the above system by August 1, such that the RODS Client Services Representative can identify and analyze problems which may occur in the implementation process. Fine-tuning and feedback should occur during the summer, and may include, if appropriate, Regional or Headquarters visits to increase our mutual understanding of the processes and procedures that facilitate the timely exchange of information.