

Superfund



SUPERFUND REMOVAL PROCEDURES

Removal Response Reporting: POLREPs and OSC Reports

U.S. Environmental Protection Agency
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SUPERFUND REMOVAL PROCEDURES
REMOVAL RESPONSE REPORTING:
POLREPs and OSC Reports

Office of Emergency and Remedial Response
U.S. Environmental Protection Agency
Washington, DC 20460



NOTICE

The procedures set out in this document are intended solely for the guidance of Government personnel. They are not intended nor can they be relied upon to create any rights enforceable by any party in litigation with the United States. EPA officials may decide to follow the guidance provided in this document, or to act at variance with the guidance, based on an analysis of site circumstances. The Agency also reserves the right to change this guidance at any time without public notice.

KEY TO SYMBOLS

Two types of symbols appear throughout this document to assist readers in obtaining additional information or to focus attention on specific points.

Bracketed numbers [#] appear in the text and exhibits and correspond to specific references in Appendix B. This comprehensive reference list includes related guidance documents, statutes, and regulations which provide more detailed information on Superfund program policies and procedures.

Some information required for the reports may also be required for the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS). This information is denoted by the symbol © in the POLREP models and the model OSC Report. This symbol is intended to assist OSCs in identifying items to be entered into CERCLIS.



This document is part of a ten-volume series of guidance documents collectively titled the Superfund Removal Procedures. These stand-alone volumes update and replace OSWER Directive 9360.0-03B, the single-volume Superfund Removal Procedures manual, which was issued in February 1988.

Each volume in the series is dedicated to a particular aspect of the removal process and includes a volume-specific Contents, References, and Key Words Index. The series comprises the following nine procedural volumes:

The Removal Response Decision: Site Discovery to Response Decision

Action Memorandum Guidance [*Publication 9360.3-01*]

Response Management: Removal Start-up to Close-out

Removal Enforcement Guidance for On-Scene Coordinators [*Publication 9360.3-06*]

Public Participation Guidance for On-Scene Coordinators: Community Relations and the Administrative Record [*Publication 9360.3-05*]

Removal Response Reporting: POLREPs and OSC Reports

Special Requirements

Guidance on the Consideration of ARARs During Removal Actions [*Publication 9360.3-02*]

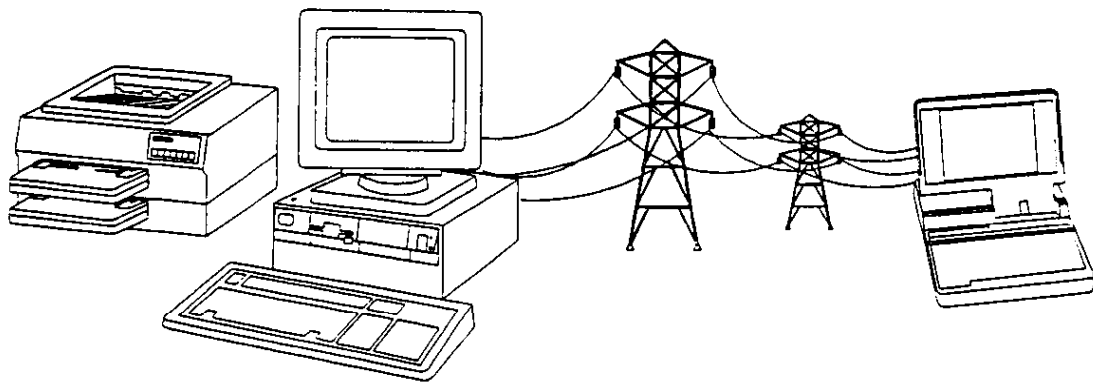
State Participation in Federal-Lead Removals

In addition, the series includes an Overview volume containing a comprehensive Table of Contents, List of Exhibits, Index of Key Words, List of Acronyms, and Glossary, for use as a quick reference.



One of the most important responsibilities of the On-Scene Coordinator (OSC) is reporting all removal activities to EPA management and the public. Reporting requirements include preparing a series of Pollution Reports (POLREPs) and an OSC Report for each removal. This Removal Response Reporting volume describes how to prepare and distribute POLREPs and OSC Reports. POLREPs and OSC Reports must meet the Superfund program policy requirements and, where applicable, the regulatory requirements under section 300.165 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

This volume clarifies reporting criteria and informs the preparers of POLREPs and OSC Reports about the potential users and uses of these reports. This volume will make these reports more useful by promoting their accurate preparation and timely distribution. Accurate documentation is critical for cost recovery and overall program management.



Preparation of accurate, complete, and timely reports is an important part of an OSC's job and critical to the success of the program.



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SECTION I

POLLUTION REPORT GUIDANCE

Pollution Reports (POLREPs) comprise initial, progress, special, and final POLREPs. They provide factual, operational, and progressive data on an incident or on site activities, and a current accounting of the total funds allocated for removal activities[1]. POLREPs also detail the search for potentially responsible parties (PRPs), other enforcement activities, and measures taken to inform the community of the removal activities. They also inform OSCs at other sites about innovative approaches to containment, site cleanup, and waste treatment or disposal which were successful or unsuccessful. POLREPs provide detailed progressive information on cumulative costs and activities at removal sites. POLREPs are a means of alerting EPA Headquarters and Regional program management about ongoing removal activities, cumulative costs, and important or critical events occurring or pending at sites.



POLLUTION REPORTS

Purpose

Pollution Reports (POLREPs) provide documentation of activities for: removal activities under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986 [2]; oil spill responses under the Oil Pollution Act (OPA) of 1990¹; and, in some instances, underground storage tank removals under the Resource Conservation and Recovery Act (RCRA). Although the POLREP model presented in this document may be used to write POLREPs for all three response activities mentioned, the information and examples used in this volume of the Superfund Removal Procedures (SRP) apply only to CERCLA removal activities.

The principal function of the POLREP is to inform Regional management, EPA Headquarters, the Regional Response Team (RRT), the National Response Team (NRT), and the trustees of affected natural resources regarding:

- The source and circumstances of the release
- The identity of potentially responsible parties (PRPs)
- The removal activities performed
- The costs incurred for the removal activities
- The impact and potential impact of the release on public health and welfare, and on the environment

OSCs prepare POLREPs throughout a removal activity, providing factual and timely reporting of ongoing removal activities and the total costs incurred for most removal sites. Although the NCP does not require POLREPs for PRP-lead sites, OSCs are encouraged to prepare POLREPs and keep Regional management, Headquarters, the NRT, and the RRT informed of activities on site, especially any unusual or significant incidents. POLREPs are prepared at the initiation and completion of a removal activity, and at regular intervals in-between. POLREPs should be prepared daily, weekly, monthly, or as the need arises due to changes at the site, keeping in mind Regional practices. POLREPs provide detailed information regarding the initial situation, ongoing removal activities, the next steps to be taken, and the

¹ Responses to oil spills prior to August 18, 1990, were funded under Section 311(k) of the Clean Water Act (CWA). Under Section 2002(b)(2) of the Oil Pollution Act (OPA) of 1990, Section 311(k) was repealed. In brief, the OPA increases the Federal oil spill fund from \$35 million to \$1 billion. The OPA also increases and expands the administrative and civil penalties for discharges of oil. The OPA establishes stricter requirements (including potential administrative penalties for noncompliance) for the development of prevention, containment, and cleanup contingency plans for onshore and offshore facilities.

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breakdown of cumulative project costs. They provide details regarding enforcement activities, media attention, and measures taken to inform the affected community of removal activities. The final POLREP for the removal documents that all proposed tasks have been completed as outlined in the Action Memorandum, thereby establishing the completion date for the removal. The final POLREP also summarizes the results achieved by the removal.

The collection of POLREPs for each site is often the best detailed record of removal activities.

POLREP Distribution

POLREPs are sent to the Director of the Emergency Response Division (ERD) at:

- E-Mail EPA 5511, or
- Telefax number (703) 603-9116 or (703) 603-9107

In the event that neither one of these methods of communication is available, POLREPs may be mailed to:

Director, Emergency Response Division, 5202-G
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

In addition, POLREPs should be distributed to Regional branch/section chiefs and all agencies or parties participating in the removal activity, as appropriate, including, but not limited to:

- U.S. Coast Guard, telefax number (202) 267-2165
- RRT representatives
- State representatives
- Local/county representatives
- U.S. Fish and Wildlife Service
- National Oceanic and Atmospheric Administration

Users and Uses of POLREPs

The primary users of POLREPs are Regional program managers and EPA Headquarters staff. POLREPs are the primary means for OSCs to notify Headquarters Regional Coordinators (and all Headquarters personnel) of routine site progress and important or critical events. OSCs also use POLREPs to inform the NRT, the RRT, and the trustees of natural resources affected by the release, the identity of the PRP, the removal activity, the costs, and the effects of the release on public health, welfare, and the environment.

POLREPs provide a current, cumulative, estimated accounting of the total funds allocated for the removal activities and of how those funds are spent. Costs reported in POLREPs assist Regional section chiefs and Regional Coordinators in anticipating the need to amend Action Memoranda and to request ceiling increases [4]. POLREPs provide information on problems that may require Headquarters support. The Regional Coordinators emphasize that POLREPs should report not only what has occurred, but also upcoming events. Headquarters and Regional program managers use POLREPs for research purposes to assist in defining policy and developing guidance, and to learn about innovative approaches to hazardous substance containment, treatment, and disposal. POLREPs may also be used to report under the Superfund Comprehensive Accomplishments Plan and the Strategic Planning and Management System. Final POLREPs are important to cost recovery personnel in the Regions, the Office of Enforcement Compliance Assurance (formerly the Office of Waste Programs Enforcement), and the Department of Justice for Statute of Limitations determinations.

Information Requirements for POLREPs

POLREPs should contain **only factual information concerning a site**. Presenting the information as objective statements of fact will minimize the possible adverse effects of negative performance appraisals on cost recovery efforts. In describing the effectiveness of removal activities, **do not make subjective judgments, draw conclusions which are not fact-based, or discuss the legality of actions or events.**

There are four main types of POLREPs: initial, progress, special, and final. After an initial POLREP, progress POLREPs are prepared intermittently throughout the removal activity. Special POLREPs document unanticipated developments which affect the progress or focus of the removal (e.g., flooding, accidents). Final POLREPs document that all response activities listed in the Action Memorandum and any addenda are complete. Some response activities require only one POLREP, which acts as both an initial and final POLREP. Refer to Appendix A for a model of this type of POLREP. Summaries of the information requirements for each type of POLREP are presented below.

POLLUTION REPORTS

Initial POLREPs

An initial POLREP is prepared for each new removal activity. The information in an initial POLREP should be clear, precise, and as complete as possible. Subsequent POLREPs need not have as much detail as the initial POLREP. Readers of later POLREPs are frequently referred to the initial POLREP for background and site information. The initial report should give the exact site location and coordinates (latitude/longitude); describe the incident, including results of the preliminary assessment (PA) or site inspection; discuss the status of removal or remedial activities (including enforcement); verify that the State has been consulted and discuss any results of that notification; describe the next steps to be taken; and identify any key issues or problem areas.

At some sites, a combined site screening and assessment may be performed which will address both removal and remedial requirements. The results of the assessment and/or site inspection must be reported in the initial POLREP.

Depending on the circumstances of the response, initial POLREPs may be written before the Action Memorandum for the site has been written and approved for the site. If the Action Memorandum has been written, the initial POLREP should indicate its status, noting when it was written, if the Action Memorandum was approved, and specifying the project ceiling and expenditures. A model for an initial POLREP is presented on pages 11 to 16.

Some information that should be in a POLREP:

The exact site location including site coordinates (latitude/longitude), street address (city, county, state), acreage, and boundaries.

Whether an alternative to land disposal of wastes was used. Use care in documenting the rationale and the use of any alternative technology. Be sure to document which wastes are returned to a manufacturer or user or are otherwise recycled.

Contact with news media staff and with officials at the local, State, or national level. Document all public meetings that are held.

All contact with PRPs, including notice letters, administrative orders, and all written or oral communications.

Problems with disposal of wastes.

Unusual occurrences that may have affected the scope or cost of the removal action. Discuss inclement weather, flooding, additional contaminants found, citizen protests, etc.

In many cases, the initial POLREP is written prior to the completion of the Action Memorandum.

Progress POLREPs

Progress POLREPs should describe the status of ongoing removal activities; explain the actions taken since the last POLREP; describe the next steps to be taken; briefly discuss the key issues and problem areas; and detail current cost information (project ceiling and expenditures). In addition, progress POLREPs should include other pertinent (but non-sensitive) information, such as the status of efforts to locate and obtain cleanup by PRPs, and community relations concerns. In general, progress POLREPs should contain information on any changes since the previous POLREP.

Progress POLREPs track estimated cumulative project ceiling expenditures. Regional practices may differ on the frequency of progress POLREPs. However, if the activity at the site warrants them, routine progress POLREPs generally should be prepared and submitted to ERD once every week. If there is little to report and the activities do not change substantially from week to week (e.g., the continued sampling and removal of hundreds of drums), routine progress POLREPs should be submitted once a month. Where the situation warrants (e.g., response to a spill which included the evacuation of nearby residents), submit progress reports on a more frequent (such as daily) basis. If circumstances warrant delays in submission of POLREPs, such delays should not be deemed actions at variance with this guidance. A model for a progress POLREP begins on page 19.

Special POLREPs

Special POLREPs are written when the situation at the site justifies particular attention. There is no unique format required for a special POLREP. The format for a progress POLREP may be used; however, the POLREP should carry the banner "SPECIAL" across the top to alert the reader. Situations that justify particular attention may include fires, explosions, floods, heightened community or media attention, and accidents, even where no damage or injury was sustained. (If there is an accident on site, an OSHA 101 form should be completed, in addition to reporting the accident in the POLREP.) Special POLREPs should describe the incident or change in circumstances which warranted special attention; outline the actions taken in response to the incident; specify any change in scope of work the incident caused; list any key issues associated with the incident (such as media attention or demobilization of the contractor); and provide current cost information (including expenditures associated with the incident). Refer to the model of a progress/special POLREP on page 19.

Final POLREPs

When a removal has been completed (i.e., when all objectives outlined in the Action Memorandum and any addenda, including removal and transport of wastes off site, waste disposal, and demobilization have been accomplished), a final POLREP is prepared and submitted. The final POLREP is submitted on the action completion date. It describes the current situation (site conditions at the completion of the

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removal activity); explains the actions taken since the last POLREP; outlines the next action(s), if any, to be conducted after the completion of this response (e.g., remedial activity or post-removal site control); presents the results achieved by the removal activity; and details final costs associated with the removal activity. A final POLREP should be precise and detailed because it is often used by cost recovery personnel in the Regions, the Office of Enforcement Compliance Assurance, and the Department of Justice. A model of a final POLREP begins on page 25.

Write the final POLREP immediately after the completion of the removal action.

POLREP Format

All POLREPs should be objective, containing only factual, non-sensitive information concerning the site, and should not draw conclusions or make recommendations. POLREPs must be concise, generally one to two pages in length, and should contain only the kinds of information listed in the models below. The initial and final POLREPs should be detailed and complete, while the progress and special POLREPs may be updates of the previous POLREP and can refer the reader to the initial POLREP for more information, if necessary. The use of the following models by all ten Regions will result in nationally consistent and comprehensive reporting and will make accessing information from any of the POLREPs easier for all users.

In addition to providing a summary of the site situation and actions taken since the last POLREP, each POLREP includes a detailed cost accounting of site expenditures, specifying the project ceiling, the current cost to date, and the amount remaining for

Some information that should not be in a POLREP:

Uncommon abbreviations. Be aware that not all readers are familiar with abbreviations for State agencies, local computer systems, etc.

Indeterminate measures for quantities of waste removed from a site; (e.g., three truckloads of contaminated soil were removed, or four dumpsters filled with soil and debris were trucked off the site). Unless the volume of such containers has been indicated, the reader has no information about the quantity of waste removed. Use defined measures of weight and volume instead.

Chronological descriptions of work performed, with hour-by-hour, step-by-step notations. Do not repeat the site log entries verbatim. The POLREP should be more concise than log book accounts.

Confidential and PRP-sensitive information that may hamper enforcement efforts.

Unspecified or subjective complaints about contractor performance. Such comments are useful only when they are factual (e.g., the ERRS contractor did not have the drum grapples needed to stage the drums), and not statements of opinion.

SPECIFICITY IN RECORDING ACTIONS

For all POLREPs: Be as specific as possible when recording information about a site. Record the exact location of the site, including site coordinates (latitude/longitude), street address (city, county, state), acreage, and boundaries. Use precise measures (or best estimates) of area, volume, or weight. Indeterminate quantities and undefined references provide little information. Try to provide quantitative measures when describing:

- Concentrations above "background levels" – indicate the background levels
- Amounts of stained soil or affected vegetation (e.g., stressed, diseased, or dead) – estimate the area and volume of contamination
- Number of residents relocated
- Number of individuals or residences provided with alternative water supplies
- Quantities of solid or liquid wastes removed from the site or treated on site

the removal activity. Cost data may be supplemented according to Regional cost-tracking practices, provided the required information is complete.

Exhibit 1 on page 10 provides the standard outline for all POLREPs. The three model POLREPs that follow address data requirements and provide examples for each type of POLREP.

Exhibit 2 on page 17 provides detailed information on recording site wastes that should be listed in the waste matrix. It lists the types of wastestreams, containment, treatment, and disposal options available to the OSC.

Exhibit 3 on page 30 provides a POLREP review checklist. OSCs should refer to this checklist to ensure that all POLREPs are complete.

POLLUTION REPORTS

EXHIBIT 1. POLREP OUTLINE

I. Heading

Date POLREP is written
Subject (site name)
From
To
POLREP Number

II. Background

Site Number
Delivery Order Number
Response Authority
ERNS Number/CERCLIS Number
NPL Status
State Notification
Action Memorandum Status
Start Date
Demobilization Date
Completion Date

III. Site Information

- A. Incident Category
- B. Site Description
 - 1. Site location
 - 2. Description of threat
- C. Preliminary Assessment/Site Inspection Results

IV. Response Information

- A. Situation
 - 1. Current situation
 - 2. Removal activities to date
 - 3. Enforcement
- B. Planned Removal Activities
- C. Next Steps
- D. Key Issues

V. Cost Information

VI. Disposition of Wastes

**U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT
Model Initial POLREP**

I. HEADING *Example:*

⊙² Date: *October 10, 1991*

⊙ Subject: *Whimperton Wire Company Site, Bobsled, New Jersey*

⊙ From: *Joan Smith, OSC, U.S. EPA, Region 2, Response and Prevention Branch*

To: *Robert Watson, Director, ERD*
Janet Cohen, Response Operations Branch Chief, Region 2
James Stacks, NJDEP

POLREP No.: *POLREP 1³*

II. BACKGROUND *Example:*

⊙ Site No.: *Q9*

Delivery Order No.: *N/A*

Response Authority: *CERCLA, § 104(a)*

ERNS No.:⁴ *30691*

⊙ CERCLIS No.:⁵ *N/A*

⊙ NPL Status: *Final NPL*

State Notification: *NJDEP notified*

⊙ Action Memorandum Status: *Under preparation*

Start Date:⁶ *N/A*

Demobilization Date: *N/A*

Completion Date: *N/A*

² A ⊙ denotes information that should be included in CERCLIS.

³ Certain removals may require only one POLREP that becomes both the initial POLREP and the final POLREP. If this is the case, refer to the model initial and final POLREP in Appendix A to ensure that the information requirements for both the initial and the final POLREP are met.

⁴ Emergency Response Notification System (ERNS) is a national computer database and retrieval system used to store information on the release of oil and hazardous substances.

⁵ If the CERCLIS number is available at this stage, use both the CERCLIS and ERNS numbers.

⁶ The start date is the date of the actual start of the removal and not the date of the preliminary assessment. The initial POLREP may be written before the Action Memorandum has been written and approved for the site. If the initial POLREP is written before the actual start of the removal, the start date should be indicated as N/A.

MODEL INITIAL POLREP

III. SITE INFORMATION

⊙ A. Incident Category

- Indicate the appropriate CERCLA incident category for the site from the following list:

Active Production Facility
Inactive Production Facility
Active Waste Management Facility
Inactive Waste Management Facility
Midnight Dump
Transportation-Related
Other (Explain)

Example: CERCLA incident category: Inactive Production Facility

⊙ B. Site Description

1. Site location

- Briefly describe the site setting, including site coordinates (latitude/longitude), location (city, county, state), acreage, and ownership.

Example: The Whimperton Wire Company is located in Bobsled Township, Hunterdon County, NJ (38° 37' 57" N, 75° 35' 06" W). The site is a 200-acre abandoned steel manufacturing facility owned by David A. Whimperton.

- Describe the area (e.g., residential, urban, commercial) and estimate the threatened population (as identified in the Preliminary Assessment).

Example: The site borders the Delaware River to the north and Sanders Creek to the east. The residential community of Bobsled surrounds the site to the south and west. Approximately 1,450 people reside within a one-mile radius of the site.

- Discuss past and present site activities.

Example: The company operated from 1906 until 1984, and produced primarily steel wire and cable; in recent years the site also served a variety of industrial purposes, including a polymer reclamation facility, a warehouse facility, a repair facility for trailers, and an equipment storage facility for a construction company.

2. Description of threat

- Describe the threat to human health or the environment posed by the site. If the threat is the result of a single incident or

release, describe the incident or release, including the date and what ensued.

Example: In September 1991, the EPA Region 2 Removal Action Branch requested that the Region 2 Response and Prevention Branch conduct a preliminary assessment of the Whimperton Wire Company site. The request was based in part on requests from local officials, including the Bobsled Town Fire Marshal, who had expressed concern that uncontained hazardous substances at this site presented a potential threat to the local population.

C. Preliminary Assessment/Site Inspection Results

- Briefly discuss the results of the site evaluation.

Example: On September 23, 1991, EPA and the technical assistance contractor conducted a preliminary assessment to determine the need to remove hazardous substances from the site. The site was found to contain approximately 2,100 drums containing unknown liquids and solids, 3 chemical treatment baths in which unknown solutions were present, 59 compressed gas cylinders, 4 chemical laboratories containing various sized containers, 2 aboveground storage tanks with unknown contents, stained soil areas, and exposed asbestos insulation on overhead pipes.

IV. RESPONSE INFORMATION

• **A. Situation**

1. Current situation

- Summarize the current situation on site; include information pertinent to site conditions, including (but not limited to) weather, media activity, and unusual incidents.

2. Removal activities to date

- Describe what, if any, removal activities have already been initiated, including preparation of the Action Memorandum, whether the OSC invoked the \$50K response authority for emergency situations, any actual site mobilization and the actions taken, and any community relations activities.

Example: The OSC is currently writing an Action Memorandum for authorization to begin removal activities. The Action Memorandum will be submitted to the Regional Administrator by October 23, 1991.

After the Action Memorandum is signed, the OSC will meet with Bobsled Township Mayor Brenda Cook and New Jersey Congressman Bart Wilson to discuss future cleanup activities for the site.

MODEL INITIAL POLREP

- Discuss State and local agency involvement, including any request for EPA assistance; any State or local agency cooperation in assessing the incident and threats, any "first responder" or other actions taken by State or other agencies to protect public health and the environment; and whether State or other agency personnel remain at the site.

Example: The State (NJDEP) provided historical information on the site during the assessment phase of the removal. In addition, the Bobsled Township Fire Department provided a renewable air supply during the preliminary assessment.

3. Enforcement

- Indicate whether EPA or State enforcement activities have been initiated.

Example: Nineteen PRPs have been identified and letters notifying them of potential liability under Section 107(a) of CERCLA are being prepared by the Removal Enforcement Section.

B. Planned Removal Activities

- If the Action Memorandum has already been prepared, discuss the planned removal activity as outlined in the Action Memorandum.

Example: Because of the large size of the facility, the site will be divided into four quadrants and a two-phase removal activity is proposed. Phase 1 will include immediate site stabilization measures. Drums, aboveground tanks, and compressed air cylinders will be inspected for integrity, sampled for analysis, and stored on site while arrangements for transportation and disposal off site are made. Loose asbestos will be removed from buildings and containerized on site for disposal. Phase 2 will consist of the off-site transport and disposal of materials stored during Phase 1.

C. Next Steps

- Describe plans for removal activities, including site mobilization, sampling, and other cleanup activities.

Example: If the Action Memorandum is approved, EPA will mobilize the ERRS contractor on November 2, 1991, and begin removal activities with the collection of uncontrolled and uncontained materials.

- Discuss ongoing PRP search or other enforcement activities, as appropriate.

Example: EPA will meet next week with Personal Investments, Incorporated (PII), which holds a financial interest in the site as lien-holder. PII is currently providing security guards for the site on a 24-hour basis.

- Outline any planned meetings with local authorities.

Example: If the Action Memorandum is approved, the OSC will attend a meeting

MODEL INITIAL POLREP

with Bobsled Township Mayor Brenda Cook and New Jersey Congressman Bart Wilson on October 26, 1991, to discuss future site activity.

- Discuss planned community relations activities.
Example: EPA is planning to issue a fact sheet concerning the site and cleanup activities. This fact sheet will include a telephone number for an EPA Regional contact who will address questions from concerned residents.

D. Key Issues

- Identify any problem areas.

V. COST INFORMATION

- Provide detailed current cost estimates for the site using the RCMS daily cost summary. All expenditures relevant to the site should be noted in the POLREP. OSCs should also indicate any anticipated future funding needs.

NOTE: There are no costs noted in this model initial POLREP, because the Action Memo is not complete, no costs have been incurred, and there is no project ceiling⁷ yet. Only those costs that can be attributed to the project ceiling should be included. For an example of cost summary in a model POLREP, please refer to the Cost Information section in the model progress POLREP on page 23.

- Include the following statement in all POLREPs where costs are noted:

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Note: Regional offices should include ceilings for ERRS, TAT/START, or other line items if such ceilings are maintained. In addition, Regional offices may track other costs not mentioned here according to Regional practices, provided that the required cost information is included in the Cost Information section.

⁷ The project ceiling is the proposed total removal cost as estimated in the Action Memorandum.

MODEL INITIAL POLREP

VI. DISPOSITION OF WASTES

- Using the waste disposal matrix below, list the wastestreams identified and note the medium and quantity affected. For each wastestream, indicate the planned or actual disposition (e.g., containment, treatment, disposal). See Exhibit 2 on page 17 for more information on recording site wastes.
- Abbreviations may be used in the matrix and clarified in the text of the POLREP. Keep each individual wastestream separate. See Exhibit 2 for more information.

Example:

<i>Wastestream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Containment - Migration Control</i>	<i>Treatment</i>	<i>Disposal</i>
<i>Base neutral solids</i>	<i>Solid wastes</i>	<i>450 cu yd</i>	<i>Bulked & overpacked</i>	<i>None</i>	
<i>Acids</i>	<i>Liquid wastes</i>	<i>5,000 gal</i>	<i>Bulked & overpacked</i>	<i>None</i>	