Felicia will be back Jan 31
meet 2:00 w/ F.B.

3008(a) — compliance orders

whenever the Administrator determines there has been a violation — can order penalties, compliance, or both

↓

X 1. were lagoons a RCRA violation?

2. were spills a RCRA violation?

— would have to call the spill a disposal on-site —

safe drinking water act:

§ on compliance + civil actions never seems to say who will be subject to suit —

statute aimed at public water systems — never addresses other responsible parties

suit would need to be against Collierville to clear up water?

but have already made plans to abandon wells to Carrier —

so — public drinking water will be secure

Collierville is currently aerating H_2O before it gets to consumers

10626278

moratorium : make sure there is a lmt on time

differences b/n RCRA / CERCLA

1. public notice

2. ARARs – we have to meet them all - RCRA has its own so may not have to meet water's, etc

3. no more timeliness –

4. if there is SF consent order w/ RCRA oversight – they get both programs –

SF will not agree to any more RCRA oversights –

1 ltr

we will use data SLA can show data is good

(A) we are going to do as SF – want to do as consent order

(B) here's moratorium notice

(1) this is maximum time – not minimum

(2) we will move as quickly as you want –

(AO must be signed by March 31 to meet commitment to hdqtrs.

questions for Felicia

1. talk abt negotiating for RI/FS w/ City in ltr → city — coord. of that w/ AO for Carrier.

2. timing — reason for ~~14~~ 21 days? what is status of site? imminent problems?

3. are we sending AO → Carrier w/ this ltr or by separate cover?

4. only one Attachment A
   a. need definitions / instructions?
   b. diff questions for diff pties?

5. what is incorporated name of city? prob. not mayor + aldermen (may imply personal responsibility)