REMEDIAL SITE ASSESSMENT DECISION EPA - REGION 5

SITE NAME: Lucent Technologies **EPA ID#** OHD004282703

ALIAS SITE NAME(S): American Telephone & Telegraph

CITY: _____ **COUNTY:** _____ **STATE:** OH

REPORT DATED: 11/2000 **REPORT TYPE:** Memo

REPORT PREPARER: EPA - SF/RCRA **SITE TYPE:** ____ GAO X IG

DISCUSSION/RATIONALE: "Lead Confirmed" - Site deferral to RCRA is correct.

Special Initiative Flags entered. See attached.

Report Reviewed/ Site Decision Made by: J Griffin / J Pels **Date:** 11/22/00

Region 5 Revision of EPA Form # 9100-3,11/00 – Special - IG Audit

US EPA RECORDS CENTER REGION 5
408067

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: November 20, 2000

SUBJECT: Lead Confirmation for Sites Identified in the FY'1999 OIG Audit of Sites Deferred to RCRA

FROM: Joseph Duffick
Brownfield/Early Action Section
Superfund Division

Gerald Phillips
Corrective Action Manager
Waste, Pesticides & Toxics Division

TO: SITE FILES

This memo is to memorialize the lead decisions for those sites that the Office of the Inspector General (OIG) identified in the March 1999 report, entitled "Superfund Sites Deferred to RCRA." The OIG audit recommended that Superfund reevaluate all deferred sites not in the RCRA corrective action workload to determine the best legal authority to address the sites, and any response actions necessary in order to improve communication between the programs. The OIG also recommended that the two programs should reach agreement on which program will take lead responsibility for each of the sites by the end of calendar year 2000.

The OIG lists for Region 5 included (493 sites) 'Sites Subject to Corrective Action', and (184 sites) 'RCRA Handlers' that may not be subject to corrective action. These two lists (attached) have been reviewed by both programs and are identified with one of the three Special Initiative flags. For those sites that have been scored under the RCRA NCAPS model, they are noted as RCRA Deferral - Lead Confirmed. For those sites to be addressed under Superfund, they are identified on the attached lists as RCRA Deferral - New Decision or RCRA Deferral - Further Assessment. All sites requiring reassessments by Superfund will have findings provided to RCRA for their information.

Attachments (2) *

cc: State Site Assessment Contacts
EAPMs

* FOR ATTACHMENTS PLEASE REFER TO THE FOLLOWING TWO SITE FILES:
AKZO COATINGS INC. ILD006390553
AG COMMUNICATION SYS. ILD005070545

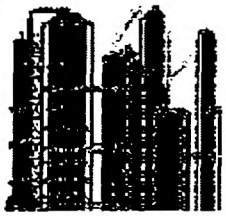
Superfund Site Assessment Data Management

EPA - Office of Emergency and Remedial Response

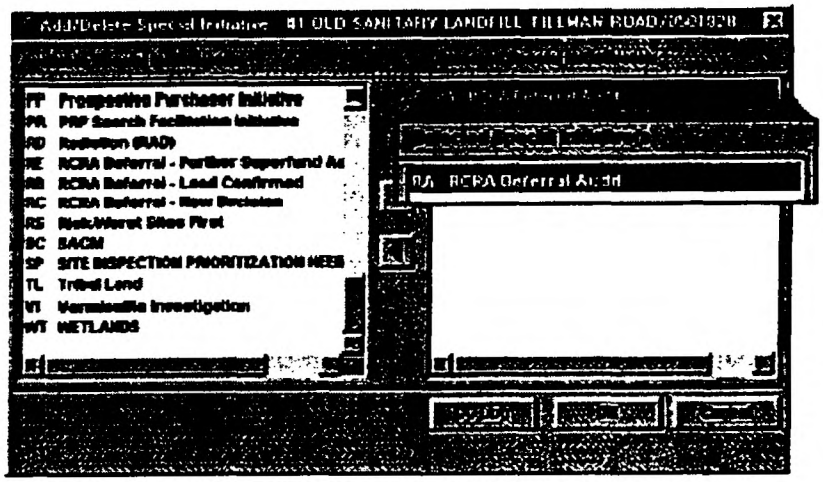
Reporting RCRA Deferral Activities

July 2000

What are RCRA Deferral Sites?



A March 1999 report by EPA's Office of the Inspector General (OIG) identified 2,941 Superfund sites that have been deferred to the Resource Conservation and Recovery Act (RCRA) program. The OIG report determined that 842 sites are being appropriately addressed under RCRA, and 2,099 need further attention.



EPA has developed two measures to track and evaluate these 2,099 sites in WasteLAN. First, EPA Headquarters will flag the sites using the existing "RCRA Deferral Audit" Special Initiative, and Regions will be able to enter one of the following three new Special Initiatives : RCRA Deferral—Lead Confirmed; RCRA Deferral—New Decision; or RCRA Deferral—Further Assessment. The second measure adds a new WasteLAN action, "Site Reassessment", that will track reassessment activities at sites.

How Will Tracking RCRA Deferral Sites Benefit EPA?

Use of the one existing and three new Special Initiatives and the new WasteLAN action, "Site Reassessment," will allow EPA to:

- Readily identify the OIG RCRA deferral sites and accurately report their current status;
- Effectively track reassessment activities, recording dates and fiscal year accomplishments; and
- Receive proper credit for reassessment work performed in the Regions.

Additionally, these new initiatives allow the Regions to track the status of RCRA deferral sites that were identified in the 2,099 sites needing further attention. The new "Site Reassessment" action does not replace current assessment actions; it serves as a supplement in instances when some assessment is needed to evaluate new information on a site, yet a full assessment action is not warranted under the Superfund program.

How Will Regional Staff Maintain RCRA Deferral Activities?

Regions will be responsible for entering the new WasteLAN Special Initiatives. The new Regional Special Initiatives are:

- RCRA Deferral—Lead Confirmed: Indicates that the RCRA-Deferral decision was accurate; i.e., there is no change to the current RCRA deferral status.
- RCRA Deferral—New Decision: Indicates that EPA is correcting or changing the currently-listed decision from "Deferred to RCRA" to another indicator.
- RCRA Deferral—Further Superfund Assessment: Indicates that EPA needs to conduct further assessment to update the status. (This initiative should be used in conjunction with the new Site Reassessment action.)

Regions will also be responsible for recording Site Reassessment activities using the new WasteLAN action.

Who Can I Contact for More Information?

Jennifer Griesert Data Sponsor (703) 603-8888 griesert.jennifer@epa.gov
WasteLAN Techline (703) 247-4711 techline@marasconewton.com

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