Exhibit 4-2: Example Questions to Determine if Assumptions Upon Which the Remedy was Based Have Changed

For an assumption based on ...	an example question may be...
standards and TBCs	Are there changes in the standards identified as ARARs in the ROD that bear on the protectiveness of the remedy? Are there newly promulgated standards that might apply or be relevant and appropriate to the site and that bear on the protectiveness of the remedy? Are there changes in TBCs identified in the ROD that bear on the protectiveness of the remedy?
cleanup levels	What is the basis for each cleanup level identified in the ROD (e.g., risk-based or promulgated standards as ARARs)? Have there been changes to the basis of the cleanup levels? (See sample questions for "standards or TBCs" above, and for "toxicity and other contaminants characteristics" below.)
exposure pathways	Has land use or expected land use on or near the site changed (e.g., industrial to residential, commercial to residential)?
exposure pathways	Have any human health or ecological routes of exposure or receptors changed or been newly identified (e.g., dermal contact where none previously existed, new populations or species identified on site or near the site)?
exposure pathways	Are there newly identified contaminants or contaminant sources?
exposure pathways	Are there unanticipated toxic byproducts of the remedy not previously addressed by the decision documents (e.g., byproducts not evaluated at the time of remedy selection)?
exposure pathways	Have physical site conditions changed such that protectiveness may be affected (e.g., changes in anticipated direction or rate of groundwater flow)? Has understanding of physical site conditions changed (e.g., identification of a new groundwater divide)?
toxicity and other contaminant characteristics	Have toxicity factors for contaminants of concern at the site changed (e.g., Integrated Risk Information System (IRIS) evaluations? (See http://www.epa.gov/IRIS) Have other contaminant characteristics changed? Have ecological toxicity reference values and/or ecological "no observed adverse effect levels/lowest observed adverse effect" (NOAELs/LOAELs) levels changed.