

Burke, NadiaHollan

From: Burke, NadiaHollan
Sent: Tuesday, May 23, 2017 7:52 AM
To: 'Olp, Kevin@EPA'; juanita.bacey@dtsc.ca.gov
Subject: RE: Question from Bayview Hunters Point IVAN Meeting
Attachments: Superfund Site Assessment EPA Webpage TI.pdf

Hello, I also consulted with our site assessment staff that works on the NPL listing process. They explained to me that Treasure Island did score high enough for NPL listing but that they made a determination that the site qualified for "Other Cleanup Activity" Status and NPL listing was not pursued. That means that cleanup will be done by another party, and EPA will have a minimal role. NPL listing is not an automatic outcome.

Attached is a printout from EPA's webpage about the listing process from the link below with a markup hi-lighting the steps that our site assessment program took to evaluate Treasure Island. The website also includes information about how Federal Facilities are handled.

<https://www.epa.gov/superfund/superfund-site-assessment-process>

The official definition of the Other Cleanup Activity status according to our Superfund Program Implementation Manual is:

Other Cleanup Activity (OCA)

Activity Definition:

This activity is used to document the referral of a non-NPL site to a state, tribal, or federal environmental cleanup program for remedial-type work without EPA enforcement or oversight. Remedial-type work can include comprehensive site investigations in support of making cleanup determinations, interim cleanup actions, removals or final cleanup decisions, including decisions that cleanup is not required. For this definition, 'without EPA enforcement or oversight' means that there is no continuous and substantive involvement on the part of EPA while remedial-type work is ongoing, such as routinely reviewing work products and other documents and providing comments to the non-EPA party. However, EPA may gather information about activities at an Other Cleanup Activity (OCA) site through meetings or calls with the non-EPA party, by accessing related web sites, or through other means.

OCA status should only be used for sites that have completed a PA within the Superfund site assessment process and are considered to be NPL-caliber (i.e., existing information indicates that the site may achieve an HRS score > 28.5) and the site warrants remedial-type work as described above.

Regions should annually discuss progress of OCA sites with the other party leading or managing the remedial-type work to ensure adequate progress is being made. OCA sites not making adequate progress should be evaluated to determine whether another cleanup approach is warranted.

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