

# Texas Commission on Environmental Quality

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## INTEROFFICE MEMORANDUM

**To:** Regional Directors  
Regional Section Managers  
Field Operations Division

Project Managers, Corrective Action  
Section, Remediation Division

**Date:** May 27, 2003

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**Subject:** Coordination of Remediation Activities Related to Emergency Response and  
Historical Releases

### I. INTRODUCTION

This memo serves as guidance for remediation activities related to release response situations which include new and historic releases as defined below. The memo outlines the criteria for oversight by Region Offices as well as the criteria and information needed for referral of a release response action to the Corrective Action Section (CAS) of the Remediation Division. This memo, effective June 6, 2003, supercedes earlier guidance on the subject, including the November 14, 2000 memo entitled "Coordination of Remediation Activities Related to Emergency Response", and is applicable to reports submitted on or after June 6, 2003.

## II. DEFINITIONS

**Discharge or spill** (30 Texas Administrative Code (TAC) §327.2) - An act or omission by which oil, hazardous substances, waste, or other substances are spilled, leaked, pumped, poured, emitted, entered, or dumped onto or into waters in the State of Texas or by which those substances are deposited where, unless controlled or removed, they may drain, seep, run, or otherwise enter water in the State of Texas.

**Current release** (defined in this guidance) - Any reportable or non-reportable release discovered for which there is an active source. Refer to the flow chart in Figure 1 of this document. For example: the responsible person (RP) discovers contamination during a routine tank cleanout. Although the tank was emptied for the inspection, it would be considered an active source based on the status prior to cleanout.

- **Reportable release** (30 TAC §327.3) - Current release of oil, petroleum product, used oil, hazardous substances, industrial solid waste, or other substances into the environment in a quantity equal to or greater than the reportable quantity listed in 30 TAC §327.4 in any 24-hour period.
- **Non-reportable release** (defined in this guidance) - Current release in which the quantity released is less than the reportable quantity specified in 30 TAC §327.4 and actions taken are in accordance with 30 TAC §327.5 (a) and (b).

**Historic release** (defined in this guidance) - A release from an inactive source and includes known and unknown quantities. An example of a historic release would include contamination discovered during excavation activities, such as an abandoned pipeline. Upon discovery of a historic release, notification is required per Texas Water Code (TWC) §26.039 if it has caused or may cause pollution. An assessment is required in order to determine the extent and level of contamination.

## III. OVERSIGHT RESPONSIBILITIES

**Region Office Staff** - The Region Office will oversee the response to a *current reportable release* when any of the following criteria are met:

The responsible person (RP) will take 180 days or less from the date the release was reported to complete the cleanup, **AND**

- the RP will remediate the release to pre-release or background conditions; **OR**
- the RP will remediate the release using the Chapter 327 PCL procedure (see IV.B); **OR**
- the RP will remediate the release to meet the Chapter 350, Texas Risk Reduction Program (TRRP) rule, Remedy Standard A, Tier 1 values.

The Region will also oversee the response to a *current non-reportable release* if the RP chooses to remediate under Chapter 350, TRRP, Remedy Standard A, Tier 1 values or Chapter 327 PCLs. Region Office staff are responsible for ensuring that the RP has met all requirements of Chapter 327

(24-hour response provided, 30-day written report submitted with schedule, etc.) as applicable. Unresolved violations should be referred to the Enforcement Division.

**Corrective Action Section** - The Corrective Action Section (CAS) is responsible for oversight of response actions for the following types of releases:

- all historic releases;
- current releases remediated under TRRP Remedy Standard A, Tiers 2 or 3, and Remedy Standard B, Tiers 1, 2, or 3;
- current releases with notice from the RP that it is infeasible to complete response actions within 180 days from the date the release was reported; or
- current releases with documentation provided by the RP indicating groundwater has been impacted by the release.

#### **IV. RELEASE RESPONSE & REPORTING REQUIREMENTS**

Figure 1 illustrates the process for handling release response actions. Refer to the flowchart along with the text descriptions.

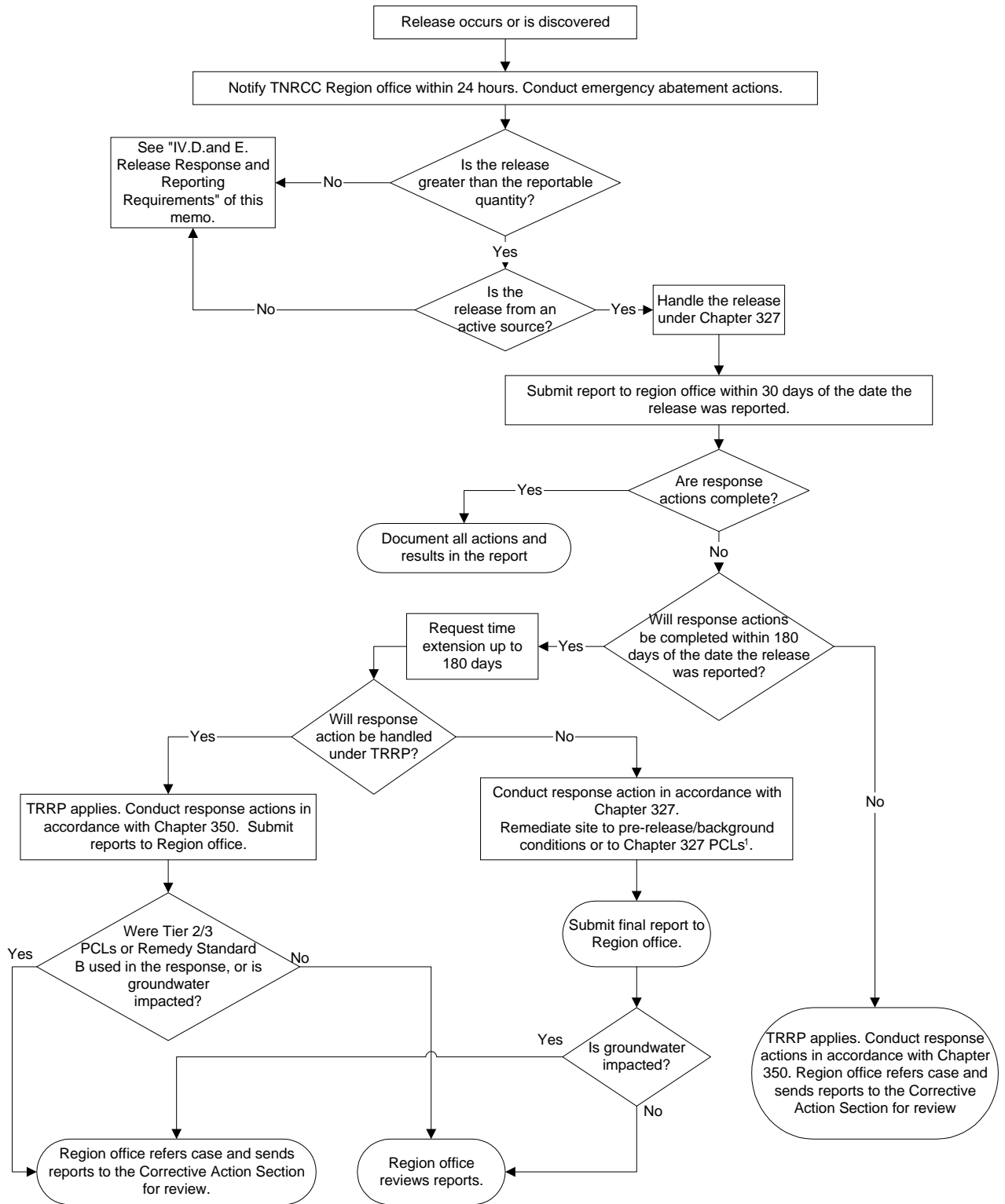
When a current reportable release occurs or a historic release is discovered, the responsible person (RP) must notify of the release to the TCEQ's Region Office during normal business hours or to the State's Emergency Response Center at 1/800/832-8224, as soon as possible but not later than 24 hours after discovery. The determination of how the release is handled depends on the source and the quantity of the release.

For all releases, the RP must take any emergency abatement actions necessary to prevent further damage from the release. The release must be contained and removed, and impacts to public health or the environment must be minimized. The Region Office and local authorities will assist the RP in determining the appropriate course of action.

##### **A. Releases Handled under Chapter 327**

The Spill Prevention and Control rule, 30 TAC Chapter 327, addresses all releases except for historic releases. If the current release is less than the reportable quantity or if the release is historic, refer to Sections IV.D. and IV.E of this memo and the August 27, 2002 TCEQ memo "Remediation Division Report Requirements for a Release Investigation", to determine the appropriate course of action. The memo is located at <http://www.tnrcc.state.tx.us/permitting/remed/ihw.html>. As defined in 30 TAC §327.5(c), the RP may choose to use 30 TAC Chapter 350 (TRRP) at any time following the release. Reporting is discussed in Section IV.C.

### Release Response Actions



1. Use the checklist to determine if Chapter 327 Protective Concentration Levels (PCLs) can be used as cleanup levels.

**Figure 1. Release Response Actions**

If the release exceeds the reportable quantity and is from an active source, the RP must comply with 30 TAC Chapter 327 and §350.2(b) and coordinate actions with the TCEQ Region Office. When handling the release response actions under Chapter 327 within 180 days of release reporting, the RP must remediate the release to background or pre-release conditions, or under certain conditions, Chapter 327 PCLs as described in Section IV.B.

The Region Office will oversee the response actions, which may include investigating the release, gathering information, working with the RP to initiate response actions, and documenting phone calls, site visits, and directives given to the RP. If the RP is not responsive or violations are unresolved, the Region Office will refer the issue to the Enforcement Division.

### **Reporting under Chapter 327**

#### **30 Day Report** - RP submits to the Region Office

- Submit 30 working days from the date the release was reported;
- Refer to 30 TAC §327.5 for the required contents of the report;
- 30-day report will be the final report if all response actions are complete at that time;
- If additional time is needed, the RP should include a request for an extension of time, not to exceed 180 days from the date the release was reported.

NOTE: If the release is cleaned up to pre-release or background conditions or Chapter 327 PCLs, the RP is NOT invoking the TRRP rules of 30 TAC 350, and TRRP reports should not be submitted.

#### **180 Day Milestone** - RP submits to the Region Office

- RP submits final report documenting completion of activities (refer to 30 TAC §327.5 for the required contents of the report); or
- RP informs the Region Office in writing that the response has not been completed within 180 days;
- This will serve as notification to use Chapter 350 for the response and initiates the referral of the site from the Region Office to the CAS.

### **B. Releases Handled under Chapter 327 Protective Concentration Levels (PCLs)**

An alternative to cleanup of a release to pre-release or background conditions is through the use of Chapter 327 PCLs. The Chapter 327 PCLs are clean up values calculated to be protective of human health exposure potential, including soil ingestion, inhalation of vapors and dust, dermal contact, ingestion of vegetables by residents, and leaching of Chemicals of Concern (COCs) from soil to groundwater. The TCEQ Toxicology and Risk Assessment (TARA) Section has developed a table of Chapter 327 PCLs located at <http://www.tnrcc.state.tx.us/permitting/remed/ihw.html>. The table will be updated in March of each year unless a more frequent update is deemed necessary (see discussion box, page 7). The most current version of the Chapter 327 PCL table must be used. Be sure to obtain the latest table from the web site for the release response action.

Chapter 327 PCLs can be used under certain circumstances as the cleanup level rather than background, pre-release conditions or TRRP requirements. Chapter 327 PCLs cannot be used for response actions that exceed 180 days from the date the release was reported. The RP will use the Eligibility Checklist (Attachment 1) to determine if the Chapter 327 PCLs can be applied. If *all* answers on the checklist are “yes,” the RP may use the Chapter 327 PCLs. If *any* answer is no, the RP must clean up to background or pre-release conditions, or conduct response actions using the TRRP rule (Section IV.C.).

One cannot assume that the Chapter 327 PCLs are protective of releases to surface water or sediment or to ecological receptors. Any cleanup to Chapter 327 PCLs must include the determination that there is no impact to groundwater, or threat of impact to surface water, sediment, or ecological receptors either through leaching to groundwater or runoff of stormwater or erodible soils to surface water. The RP may use temporary physical controls, such as berms or trenches, as part of the emergency abatement actions to prevent the spread of the release. However, if permanent physical controls are needed to prevent migration to groundwater or surface water, the response actions must be conducted under the TRRP rule.

Most releases involve one or two COCs; *however*, in the event that there are more than 10 carcinogenic and/or more than 10 noncarcinogenic COCs, as indicated on the Chapter 327 PCL table, the RP will not be allowed to use Chapter 327 PCLs. When a COC has both carcinogenic and noncarcinogenic effects, the COC must be included in the count for both categories. If the release has 10 or more COCs of either category, the RP must respond to the release through one of the other options defined in this memo: background, pre-release or TRRP rule requirements. A downward adjustment to a COC’s PCL may be necessary as a result of the cumulative check, which is performed under the TRRP rule requirements.

### **Reporting under Chapter 327 PCLs**

#### **Chapter 327 PCL Report - RP submits to the Region Office**

- Use same report format as conventional release response actions that are completed to pre-release or background conditions, that is, a letter report format;
- Include the report contents described in §327.5;
- A Chapter 327 PCL report must also include the following items:
  - S completed Eligibility Checklist (Attachment 1);
  - S completed Ecological Tier 1 Exclusion Criteria Checklist (30 TAC 350, Figure: §350.77(b));
  - S tabulated data for comparison of investigation and confirmation sample results to Chapter 327 PCL values; and
  - S additional information as may be requested by the executive director;
- If the RP chooses to switch to TRRP, or is required to switch, Chapter 327 PCL reports will not be accepted in lieu of, or in addition to the required TRRP reports.

#### **C. Releases Handled under TRRP**

The RP may choose to use the TRRP rule at any time during the initial 180 days. However, response actions must be managed in accordance with the TRRP rule if the actions will take longer

to complete than 180 days from the date the release was reported. If the response action will not be completed within 180 days, the RP must notify the Region, and the Region will refer the case to the CAS (Section V.). If the RP has not corresponded with the Region Office prior to the end of the 180-day period, the Region Office will contact the RP to determine the status of the response.

The Region Office will initially oversee the response actions and receive reports. Attachment 2 contains a list of questions for the reviewer to consider for a soil-only Affected Property Assessment Report (APAR). The list is not intended to be an outline for completing an APAR; it is a guide only. The RP may choose Remedy Standard A or Remedy Standard B at any Tier for response to a release. When using TRRP, all applicable conditions of the rule apply, including the requirements for assessment and cleanup reporting. The RP can self-implement the actions when conducting a Remedy Standard A response action; however, submittal of a Response Action Plan (RAP) is required when using Remedy Standard B. Refer to the TRRP rule and guidance on use of the rule located at <http://www.tnrcc.state.tx.us/permitting/trrp.htm> for the implementation details.

When completing reports under TRRP, current toxicity factors must be used. The Toxicity Factor tables will be updated in March of each year unless a more frequent update is deemed necessary. Be sure to obtain the latest table from the web site for the release response action (see box). Persons should consult the TRRP guidance titled *Toxicity Factors and Chemical /Physical Parameters* (RG-366/TRRP-19) for specifics on the policy and schedule for updating toxicity parameter tables.

Current toxicity factors must be used. This means that the toxicity factors need to be current during the March to February time period for the year in which the SIN or RAP is submitted to the TCEQ. For example, if an APAR is submitted in June 2002 based on the toxicity factors current as of March 2002, and then a RAP is submitted in August 2003, the RAP must address any PCLs that have been modified as a result of changes to the toxicity factors posted in the March 2003 update. If the toxicity factors change subsequent to the submittal of the SIN or RAP, then that situation will be addressed on a case-specific basis.
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## Reporting under TRRP

### Chapter 350 Reports for TRRP rules - RP submits to the Region Office

- APAR and the Response Action Completion Report (RACR) must demonstrate that attainment of Remedy Standard A under Chapter 350 has been achieved, or submit an APAR and a RAP for review and approval if Remedy Standard B will be chosen as the cleanup standard;
- If the RP *completes the response action* within 180 days and the release is remediated to Remedy Standard A, Tier 1, the Region Office will review the APAR, the Self-Implementation Notice (SIN), and the RACR. If the RP documents in the report that all cleanup actions required to meet Remedy Standard A, Tier 1 were achieved within 180 days (even though the report may not be submitted until after the 180-day timeframe), the Region will close out the release response actions;
- Any APAR, SIN, RAP, or RACR must be completed using agency forms. The forms are available at <http://www.tnrcc.state.tx.us/permitting/trrp.htm>.
- For Remedy Standard A, Tier 1 response to a “soils only” impact, a list of questions with corresponding applicable worksheets for the APAR is provided in Attachment 2. The checklist is not all inclusive and is recommended as guidance only.

#### **D. Historic Releases**

Historic releases are managed by the CAS. Reports are received through voluntary submittal by the RP, or via referral by the Region Office. All releases that have caused or may cause pollution require notification per TWC §26.039. Chapter 327 identifies the requirements for addressing and reporting current releases. Historic releases, however, are not covered by the reporting requirements of Chapter 327, because neither the quantity nor the time of the release is known. These unknown conditions necessitate a thorough assessment to determine the extent of contamination. The RP must comply with Chapter 350 investigation and reporting requirements, or the RP may qualify for the alternative reporting requirements that have been established by the agency in the August 27, 2002 report requirement memo (see Section IV A.) In general, the following options are allowed under the report requirements memo:

- RP must assess the release to determine the extent and level of contamination.
- If assessment results indicate COCs in environmental media are less than or equal to Method Quantitation Limit (MQL) or background, without requiring remedial activities to attain these values, contamination is not present and investigation report submittal is not required. For the benefit of the RP, documentation of assessment results should be retained in the facility records.
- If assessment results indicate COCs in environmental media are greater than MQL or background and less than TRRP Tier 1 Residential assessment levels (assuming Class 1 groundwater) and all criteria for the Ecological Tier 1 Exclusion Criteria Checklist are met, without requiring remedial activities to attain these values, contamination is present but is below action levels and a report is required (see memo for allowable report type).
- If assessment results indicate COCs in environmental media are equal to or greater than TRRP Tier 1 (and Class 1 groundwater) Residential assessment levels, contamination must be addressed, and TRRP reports must be completed.

If additional requirements have been placed on the closure/remediation from other rules, permits or orders, then the more stringent requirements will apply.

#### **E. Non-Reportable Releases**

There are no reporting or submittal requirements applicable under Chapter 327 for current non-reportable releases, unless specifically requested by the executive director (§327.5(b)). However, unauthorized releases of any quantity are prohibited by 30 TAC §327.1 and TWC §26.121 and, if of a quantity which causes or may cause pollution of waters in the State, must be abated and removed per TWC §26.266.

The RP is required to complete the release response action to pre-release, background, Chapter 327 PCLs, or TRRP. For pre-release or background, the RP will maintain the results in the operating record without direct involvement by the agency. Generators of hazardous or industrial solid waste are required by 30 TAC §335.9(a) to keep all records of waste activities regarding quantities generated, stored, processed and disposed of on-site, or shipped off-site for storage, processing or

disposal. The records may be maintained in any format, provided they are retrievable and easy to copy. Any TCEQ investigator would be able to review the records during an investigation, as needed.

If an RP chooses to use Chapter 327 PCLs for a response to a non-reportable release, the criteria detailed in Section IV.B. will be applicable. If an RP chooses to use Chapter 350, all investigation and reporting requirements will apply. Reports will be submitted to the Region Office for review. If the review indicates that the CAS is responsible for oversight (such as in Section III), the case will be referred to the CAS.

## **V. REFERRAL OF A RELEASE RESPONSE ACTION TO THE CORRECTIVE ACTION SECTION**

The Region Office will investigate current releases, gather information, work with the RP to initiate response actions, and will complete a TCEQ Oil or Hazardous Substances Spill or Bypass Report. Based on documentation provided by the RP, the Region Office will review all applicable reports, or refer the case to the CAS using criteria specified in Section III. However, prior to referral to the CAS, the Region Office must ensure there is either a written response from the RP, telephone memo, or site visit documentation indicating the current status of the response actions in accordance with 30 TAC §327.5.

If the corrective action was conducted using Tier 1 PCLs and Remedy Standard A, the Region Office will review the reports and continue coordination of the case. The Region Office will refer the case to the CAS when Tier 2 or 3 PCLs are used, when a Remedy Standard B response action is used, or when the release response activities can be combined with ongoing corrective action (currently overseen by the CAS) at the affected property, as described in Section V.B.

### **A. Referral Documentation**

The Region Office will submit all documentation provided by the RP and written documentation of all known facts about the release to the CAS along with a Remediation Referral Form (see Attachment 3). Types of documentation should include, as applicable:

- TCEQ Oil or Hazardous Substances Spill or Bypass Report;
- Copies of all RP correspondence (including documentation of groundwater contamination, inability to remediate within 180 days, etc.);
- Copy(s) of any Notice of Violation (NOV) letters, as applicable;
- Telephone memos;
- Documentation of verbal/written approvals and/or directives given to the RP;
- Documentation of extensions given to the RP;

NOTE: Extensions are not to exceed 180 days from the date the release was reported; and

- Documentation of site visits by Region Office staff.

### **B. Sites with On-Going Corrective Action**

It is appropriate to include some release response actions with ongoing corrective actions (i.e. the

site is already in CAS under a permit, agreed order, or closure). However, the RP is still required to comply with the initial response action and reporting requirements of the Chapter 327 rules. For current reportable releases, a written status report must be submitted to the Region within 30 days of the date the release was reported. In addition to the 30-day report requirements of §327.5(c), the RP shall include: (1) a discussion of the circumstances that support including the release with the ongoing corrective action; (2) the location of the release in relation to the area with ongoing corrective action (e.g., the area in the permit, agreed order or closure), and (3) the CAS project manager or contact. Upon review, the Region may refer the site and all applicable information to the CAS.

### **C. Workplans**

The TRRP rules were established to be self-implementing for the assessment (APAR) phase of a cleanup; therefore, prior agency approval is not necessary. TRRP also promotes completion of cleanup under Remedy Standard A without prior approval. However, a RAP under Remedy Standard B must be submitted to the agency for review and approval prior to implementation. For projects where Remedy Standard B will be applied, the Region will refer the APAR and the RAP to the CAS.

The RP may choose not to self-implement under Remedy Standard A of the TRRP rule by submitting the RAP to the Region with a request for review and approval; however, the 180-day clock does not stop for the review by the Region. The APAR should accompany the RAP. If the response is not completed within 180 days, copies of all comments, directives, and correspondence to and from the RP shall be included with the referral to the CAS. The Region staff will assist with any field work needed, such as site visits to follow up on the status of the remediation. CAS will route requests for field work through the FOD Central Office Waste & Emergency Response Manager.

Attachments: Attachment 1 - Chapter 327 PCL Eligibility Checklist  
Attachment 2 - Reviewing a Tier 1, Soils-Only APAR Under TRRP  
Attachment 3 - Remediation Referral Form

**ATTACHMENT 1**  
**Chapter 327 PCL Eligibility Checklist**

Use this checklist to determine if the response action qualifies for use of Chapter 327 PCLs. If all the answers are yes, use of the Chapter 327 PCLs is allowed. Use of Chapter 327 PCLs is not a substitute for compliance with the rules of Chapter 327. Include a copy of this checklist in the report. If any answer is no, clean up the release to pre-release or background conditions, or proceed under TRRP.

**1. Is this a current release?** Q Yes Q No

The response action must be for a current release as defined in this memo. Chapter 327 PCLs cannot be used for historic releases, or cleanups which exceed 180 days from the date the release is reported

**2. Is the spill confined to on-site property?** Q Yes Q No

On-site property refers to land owned or controlled by the RP. Use of Chapter 327 PCLs is not applicable to releases that occur on land not owned or controlled by the RP. Similarly, Chapter 327 PCLs are not applicable to the off-site portion of an on-site release that extends beyond the limits of the on-site property.

**3. Is the release confined to soils only, without impact to groundwater, or potential impact to surface water, sediments, or indoor air?** Q Yes Q No

The use of Chapter 327 PCLs is limited to soils only. If other environmental media (surface water, groundwater, sediments) are threatened or impacted, now or in the future, the answer to this questions is “No”. Soils include earthen containment features such as liners, tank dikes, etc.

**4. Does the release involve less than 10 carcinogenic and/or less than 10 noncarcinogenic chemicals?** Q Yes Q No

If there are more than 10 carcinogenic and/or more than 10 noncarcinogenic COCs, the answer to this question is “No” and the RP will not be allowed to use Chapter 327 PCLs. When a COC has both carcinogenic and noncarcinogenic effects, the COC must be included in the count for both categories. Cumulative adjustments must be processed under TRRP.

**5. Is the release area less than 30 acres in size?** Q Yes Q No

The Chapter 327 PCLs are based on a source area size of less than 30 acres. If the affected area is greater than 30 acres in size, Chapter 327 PCLs do not apply.

**6. Does the release site pass the Ecological Tier 1 Exclusion Criteria checklist?** Q Yes Q No

Chapter 327 PCLs are protective of human health only. Determine if additional steps are necessary for ecological protection by evaluating the release site using the ecological checklist. Perform the evaluations and provide a completed Tier 1 Exclusion Criteria checklist as part of the release report. If the site does not pass the checklist, the answer to this question is “No”.

ATTACHMENT 2

**Reviewing a Tier 1, soils-only APAR under TRRP**

This list was created to aid the reviewer, and is not intended to be used as a guide for completing an APAR. Use this list of questions to assist in the review of an APAR for an affected property where the person assessed only soils and used only Tier 1 PCLs. This list does not cover all situations that may apply to the affected property, it may be used as a guide only.

<b>Questions to ask</b>	<b>Where in the APAR to look</b>
What is the overall situation at the affected property? What media is affected?	Executive Summary
Have owners of all sampled or affected properties been notified?	Executive Summary, Appendix 12
What COCs in which media require a remedy?	Executive Summary
What are the proposed future actions?	Executive Summary, Conclusions and Recommendations
Were any emergency or abatement actions taken in response to the release? Were previous assessment activities conducted?	Chronology
Is the source of drinking water for the affected property or nearby properties threatened or affected by the release?	Worksheet 1.0
What was the past use of the site? Current use? Future use?	Worksheet 1.1, Attachment 2A
How many affected properties were involved in the assessment?	Worksheet 1.2, 2.0, Attachment 2A
What are the sources of COCs? Are the sources ongoing?	Worksheets 2.0, 3.1, Attachment 2A
What is the geologic setting? How does the geology of the area affect migration of COCs?	Worksheet 2.1, Attachments 2B, 2F
Assume Class 1 groundwater in soils-only evaluation. Are there water wells within 500 feet of the affected property?	Worksheet 2.1, Worksheet 3.2, Appendix 2
What potential receptors were evaluated? Are there any threatened or affected receptors?	Worksheets 3.0, 3.2, Attachments 3A, 3B
Is there surface water nearby?	Attachment 1B, Worksheet 3.0
Based on the type and distribution of COCs, are there any other potential receptors that should have been evaluated?	Worksheet 3.0
Did the affected property pass the Exclusion Criteria Checklist for ecological effects? If not, is a Tier 2 or 3 ecological risk assessment included in the report? If so, how do the ecological PCLs compare to the human health PCLs?	Worksheet 3.3, Attachment 9A
What are the complete or reasonably anticipated to be complete exposure pathways? Do the answers make sense based on site conditions? Were PCLs developed for each complete or reasonably anticipated to be complete exposure pathway and for those pathways required to be evaluated by rule? Which pathways require a response action? Is there a threat of exposure to the PCLE zones?	Worksheet 4.0
Are there COCs present that have COC properties or toxicity factors different from those specified in the rule or guidance?	Worksheet 4.1, Appendix 4
Were any COCs screened from PCL development? If so, are the screening criteria correct?	Worksheets 4.2, 5.1, 5.6
What media were sampled? (surface soil and subsurface soil)	Worksheet 5.0, Attachment 5A
Were all samples collected and handled appropriately?	Worksheet 5.0, Appendix 5, Appendix 13
Were the assessment levels correctly determined for both surface soil and subsurface soil?	Worksheet 5.0, Appendices 9, 10
Was the extent of COCs defined in both the lateral and vertical directions in both surface and subsurface soil?	Worksheet 5.0, Attachments 2A, 5B, 5C, Appendix 9

## Coordination of Remediation Activities

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Were analyses conducted for all the right COCs? Were appropriate analytical methods use?	Worksheets 5.1, 5.6
Were PCLs determined for all COCs not screened out?	Worksheets 5.1, 5.6
Were the PCLs determined correctly? Do the Tier 1 values listed match the correct values in the Tier 1 PCL tables? Was a cumulative check conducted if there were more than 10 COCs?	Section 5, Appendices 9, 10
Were the critical PCLs determined correctly?	Worksheets 5.5, 5.9
Are all references clearly listed?	Appendix 1
Were all the lab QA/QC procedures and results acceptable?	Appendix 5
Were all MQLs appropriate based on the usage of the analytical data?	Appendix 5
Was all waste properly disposed?	Appendices 6, 7, and 8

**Remediation Referral Form** (revised 4/15/03)

## ATTACHMENT 3

Complete and attach to documents being referred to another Section for review. The referral may be hand-delivered to the Section administrative staff, or sent via interagency mail using the appropriate mail code. Check the box indicating area referring to:

**G CAS****G PST/SAM****G Field Ops****G VCP****IHW - SWR**

or Facility ("T") ID No.:

EPA ID:

Other Program ID  
(Type & No.):**Facility Information**

Facility Name:

 First-time referral for facility  
(Attach copy of Order, AFJ, NOV, or  
other Directives)

 Ongoing referral of  
facility documents

Physical Address:

Mailing Address:

County:

Facility Contact:

Phone No.:

**Document to be reviewed**
 Original or copy has been sent to Central Records  
 Supporting documents are being sent with referral

Title &amp; Date (and Program identifiers/Doc#, as applicable):

Referring program &amp; reason for referral:

Enforcement Document results from:  Agreed Order  Agreed Judgement  NOV  Other (describe below)  
 Date of Order/AFJ/NOV \_\_\_\_\_  
 Provision requiring document submittal & review \_\_\_\_\_

Field Ops

 Remediation will take >180 days Closure of other industrial unit Groundwater contamination is documented Release from permitted/interim status  
unit Remediation being conducted under TRRP Remedy Standard A  
Tiers 2 or 3, or Remedy Standard B Closure of RCRA permitted unit/BIF  
(*send to Permits*) Historical contaminationPST/SAM/  
CAS
 Meets criteria # \_\_\_\_\_ of Criteria Referral Memo  
 NOTE: Receiving Section has 15 days to review/return case if  
 applicability criteria are not met.
 Other (describe below)Waste Water  
Permitting Municipal Waste Water Treatment Plant Closure Report**Other Information**

Comments/Other contacts:

 Referring staff requests to attend meetings scheduled with the facility**Receiving Section entry only**

Referring Staff Name, Program/Region &amp; Phone No.:

Date Received (date stamp):

Referring Staff Signature:

Date: