

Association of State and Territorial

ASTSWMO

Solid Waste Management Officials

CERCLA and Brownfields
Research Center

Site Evaluation Focus Group

**Superfund Site Assessment Program:
Benefits Beyond NPL Listing
Phase II**

March 2012

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Acknowledgements

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Purpose

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) Site Evaluation Focus Group (referenced hereafter as “the Focus Group”) developed this report to highlight the beneficial outcomes not traditionally captured, *e.g.*, State site cleanups that result from the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Site Assessment Program, commonly known as the Superfund Site Assessment Program. In March 2011, the Focus Group completed the [Superfund Site Assessment Program: Benefits Beyond NPL Listing](#) report. This report shows that funds spent on Superfund site assessments result in benefits that go beyond National Priorities List (NPL) listing and that the overall success of the Superfund program should not be measured solely by the number of NPL listings or cleanups.

The Focus Group determined that collecting non-NPL outcome information from additional States would produce more statistically robust data and conclusions. The March 2011 report, referenced hereafter as the Phase I report, reported and evaluated data from nine States. This report, known as Phase II, reports and evaluates data from an additional 19 States, bringing the total number of reporting States to 28.

Introduction

The Superfund Site Assessment Program is a partnership between the U.S. Environmental Protection Agency (EPA) and States. Since its inception in the early 1980s, the [Superfund Site Assessment Program](#) has been the foundation of the national Superfund Program, assessing more than 45,000 potentially contaminated sites.

The primary purpose of the Superfund Site Assessment Program (referenced hereafter as “Site Assessment Program”) is to evaluate sites for potential inclusion on the NPL. The site assessment process, conducted as a collaborative effort between EPA and States, determines the appropriate responses to releases of hazardous substances into the environment. During the site assessment process, EPA and States collect data to identify, evaluate, and rank hazardous waste sites based on [Hazard Ranking System \(HRS\)](#) criteria. Throughout the process, sites are screened out and removed from further review by the federal Superfund remedial program (leaving only a small minority of sites as candidates for inclusion on the [NPL](#)). As such, today’s Site Assessment Program functions as a gateway to a myriad of federal and State remediation programs. These programs include State and federal removal programs, State voluntary cleanup programs, State Superfund programs, and other State-specific cleanup programs (*e.g.*, State dry cleaner programs).

Many States partner with the EPA in the site assessment process. States enter into Superfund cooperative agreements that provide federal funding for States to conduct Superfund site assessments within their jurisdiction. For more than twenty years, States receiving this federal funding have trained professional staff, acquired the requisite equipment, and developed programs designed to investigate sites, allowing EPA to focus its resources on other aspects of

the Superfund process.

Over time, it has become apparent that State involvement in the site assessment process results in many beneficial outcomes that go beyond evaluating sites for inclusion on the NPL. It has also become apparent that these benefits are not captured by the traditional reporting methods.

To gain a better understanding of the non-NPL benefits of the Site Assessment Program, the ASTSWMO Focus Group developed the Phase I report. The report focused on those sites that are referred to other State and federal programs, *i.e.*, the non-NPL sites initially screened out by the Site Assessment Program. The Phase I report summarized the results of the non-NPL site work for nine States. This Phase II report was developed to collect and report data from additional States, producing more statistically robust data and conclusions.

The Focus Group reviewed, for the participating States, the total universe of sites¹ entered into the Comprehensive Environmental Response, Compensation, and Liability Information System ([CERCLIS](#)) from the inception of the Superfund Program and determined how many sites were addressed by State² and non-NPL federal³ cleanup programs. During Phase I, nine States representing nine EPA Regions provided data in support of this study. The Focus Group obtained data from both large and small States, including States with well-established cleanup programs and those with less well-established programs. During Phase II, the Focus Group evaluated results from 19 additional States. All ten [EPA Regions](#) were represented by the two phases. The participating States from both phases are shown in Table 1.

Additionally, the Phase I report included eight case studies that illustrated how the Site Assessment Program has resulted in cleanup and reuse under State and non-NPL federal cleanup programs.

The report will assist the States, territories, and EPA in evaluating the success and accomplishments of the Site Assessment Program beyond the traditional metrics of NPL listings.

Research Objectives and Methods

The primary objective of this research project is to demonstrate the success of the Site Assessment Program by documenting the number of State and non-NPL federal cleanups/closures that have been initiated and/or completed as a result of Superfund site assessment activities.

¹ In this report, the total universe of sites entered into CERCLIS includes all sites that have had some site assessment activity. This “universe” excludes removal action only sites.

² State cleanup programs include privately financed voluntary cleanup, state enforcement driven cleanup, state funded cleanup and cleanups funded through a specific industry program (*e.g.*, dry cleaners fund).

³ Federal cleanup programs include federal removals, RCRA deferrals, Superfund Alternative Approach and other federal enforcement.

The Phase II project was accomplished by reviewing data from 19 States and compiling the total number of State and non-NPL federal cleanups and closures that occurred at sites that were initially investigated by the Site Assessment Program. Phase II State representatives are identified in Appendix A.

Phase II data collection and evaluation methods generally followed those used during Phase I but incorporated lessons learned. For example, Phase II included a quality assurance review of the federal cleanups results.

EPA provided the Focus Group with the total universe of sites that were to become the subject of both phases of the study. This universe included all active and archived⁴ sites within the CERCLIS database, but excluded final, proposed and deleted NPL sites. The study universe also excluded sites that were identified on CERCLIS as “removal only” sites. Removal only sites are defined as sites that were or are being addressed only by the [federal Superfund removal program](#) and not by the Site Assessment program. The study universe included sites that received an EPA removal prior to or after being evaluated by the Site Assessment Program. For Phase I, the study universe for the nine States included 7,691 sites. For Phase II, the study universe included 16,860 sites. Of these sites, 98 percent had a [Preliminary Assessment](#) performed. A review of the data by participating States showed that while there were a few discrepancies between the State and federal databases, the vast majority of the site data were in agreement.

Once the universe of sites was established, participating States were asked to answer three specific questions:

- 1) The States were requested **to provide information on the total number of State cleanups/closures completed at sites within the subject universe.** While States vary in the ways that they define and track progress, the results provided a reasonable indication of cleanup work that has been accomplished. This category often included privately financed voluntary cleanups, State enforcement-driven cleanups, State-funded cleanups, and cleanups funded through a specific industry program (*i.e.*, dry cleaner-funded). This category also included sites at which additional assessment was conducted and no remediation was required. If a site was divided into separate units and cleanup was completed at one unit, the site was also counted in the total number of cleanups.
- 2) Participating States were asked **to provide information on the total number of State cleanups/closures that were currently underway at sites within the subject universe.** This list also included sites from the same State cleanup programs that were identified above.
- 3) Finally, participating States were requested **to provide the Focus Group with the total number of federal non-NPL cleanups/closures that were completed or underway within the subject universe.** This category included federal removals, RCRA deferrals,

⁴ A site that is archived (removed) from CERCLIS.

Superfund Alternative Approach sites, or other federal enforcement sites that were prompted by a Superfund site assessment activity.

Please note that each site was only included in one category thus categories are mutually exclusive and there was no double counting.

Each participating State representative received survey instructions (Appendix B) and an Excel worksheet containing that State's universe of sites. Federal non-NPL cleanup results were initially populated by EPA. Appendix C shows an example of a worksheet.

Following the Excel worksheet submittal from all 19 States, EPA Office of Superfund Remediation and Technological Innovation (OSRTI) and Focus Group representatives performed a quality assurance check on data submitted in response to Question 3 above, concerning the federal non-NPL cleanup results. Relying solely on the dates recorded in CERCLIS, it was noted when a site's earliest federal non-NPL cleanup date preceded its Preliminary Assessment date, suggesting that the Site Assessment Program activity did not prompt the federal non-NPL cleanup. These results were transmitted to affected States with a request that the State review whether the cleanup was actually driven by a Superfund Site Assessment activity. If no additional information was received from a State, the results of the non-NPL cleanup quality assurance review were used.

Research Results

Nineteen states supplied information for the Phase II report. In the interest of providing a more statistically robust data set, the results of Phase I and Phase II are combined in Table 2 and depicted graphically in Figures 1 and 2 and in the Conclusions discussion.

Table 1
Superfund Site Assessment Program: Benefits Beyond NPL Listing
States Participating in Phase I and Phase II

	EPA Regions										
	Region I	Region II	Region III	Region IV	Region V	Region VI	Region VII	Region VIII	Region IX	Region X	Total States by Phase
Phase I	MA	NJ	DE	NC	IL	OK	KS	MT	N/A	ID	9
Phase II	CT	N/A	MD	AL	WI	LA	MO	CO	CA	AL	19
	ME			GA		TX		UT		OR	
	NH			KY							
	RI			SC							
Total States by Region	5	1	2	6	2	3	2	3	1	3	28

Table 2
Superfund Site Assessment Program: Benefits Beyond NPL Listing
Phase I and Phase II Results

	EPA Region	State	State Cleanups Underway	State Cleanups Complete	Federal Non NPL Cleanups Underway and Complete	Total Non-NPL Outcomes	Number of NPL Sites ⁶	Total Sites on CERCLIS ⁵
PHASE I								
	Region I	Massachusetts	189	519	20	728	36	874
	Region II	New Jersey	772	342	79	1,193	142	1,617
	Region III	Delaware	114	4	10	128	20	273
	Region IV	North Carolina	69	363	70	502	35	999
	Region V	Illinois	137	159	85	381	51	1,674
	Region VI	Oklahoma	33	3	62	98	14	905
	Region VII	Kansas	213	141	125	479	17	757
	Region VIII	Montana	26	50	17	93	16	270
	Region X	Idaho	68	21	10	99	12	322
Totals		9 States	<i>1,621</i>	<i>1,602</i>	<i>478</i>	<i>3,701</i>	<i>343</i>	<i>7,691</i>

⁵ Total Sites on CERCLIS excludes "removal only" sites.

⁶ "Number of NPL Sites" includes final, deleted and proposed sites.

	EPA Region	State	State Cleanups Underway	State Cleanups Complete	Federal Non NPL Cleanups Underway and Complete	Total Non-NPL Outcomes	Number of NPL Sites ⁶	Total Sites on CERCLIS ⁵
PHASE II								
	Region I	Connecticut	287	38	76	401	18	721
		Maine	18	120	25	163	14	203
		New Hampshire	107	53	8	168	21	183
		Rhode Island	62	76	13	151	13	283
	Region III	Maryland	178	215	124	517	25	499
	Region IV	Alabama	20	68	93	181	16	821
		Georgia	249	346	78	673	21	1,090
		Kentucky	289	280	55	624	20	613
		South Carolina	58	86	77	221	31	581
		Tennessee	131	569	85	785	22	988
	Region V	Wisconsin	166	300	10	476	45	494
	Region VI	Louisiana	159	221	5	385	23	678
		Texas	341	72	187	600	61	2,728
	Region VII	Missouri	39	59	242	340	37	1,525
	Region VIII	Utah	3	8	96	107	23	414
		Colorado	18	41	104	163	24	667
	Region IX	California	439	535	316	1,290	109	3,320
	Region X	Alaska	98	172	24	294	9	508
		Oregon	121	163	210	494	19	544
	Totals		19 States	2,783	3,422	1,828	8,033	551
TOTALS	(Both Phases)		4,404	5,024	2,306	11,734	894	24,551

⁵ Total Sites on CERCLIS excludes "removal only" sites.

⁶ "Number of NPL Sites" includes final, deleted and proposed sites.

Table 3
Superfund Site Assessment Program: Benefits Beyond NPL Listing
Summary Results for Non-NPL Outcomes– Percentages as a Total of CERCLIS Sites

Phase	Total Sites on CERCLIS		Number of NPL Sites		State Cleanups Underway		State Cleanups Complete		Federal Cleanups		Total Non-NPL Outcomes	
	Count	% ⁵	Count	%	Count	%	Count	%	Count	%	Count	%
Phase I ¹	7,691	18	343	4	1,621	21	1,602	21	478	6	3,701	48
Phase II ²	16,860	39	551	3	2,783	17	3,422	20	1,828	11	8,033	48
Phase I and II ³	24,551	57	894	4	4,404	18	5,024	21	2,306	9	11,734	48
Projected Nationwide⁴	43,088	100	1,714	n/a	7,756	18	9,048	21	3,878	9	20,682	48

¹Phase I percentages calculated using Phase I total CERCLIS sites

²Phase II percentages calculated using Phase II total CERCLIS sites

³Phase I and II percentages calculated using Phase I and Phase II total CERCLIS sites

⁴National projections based on Phase I and Phase II percentage results. Number of NPL sites is current number of NPL sites.

⁵ Percent of total of CERCLIS sites (*i.e.*, 43,088), excluding removal only sites and final, proposed and delisted sites

Figure 1
Superfund Site Assessment Program: Benefits Beyond NPL Listing
Non-NPL Outcomes by State Resulting from the Site Assessment Program Compared to CERCLIS Sites
Phase I and Phase II Results

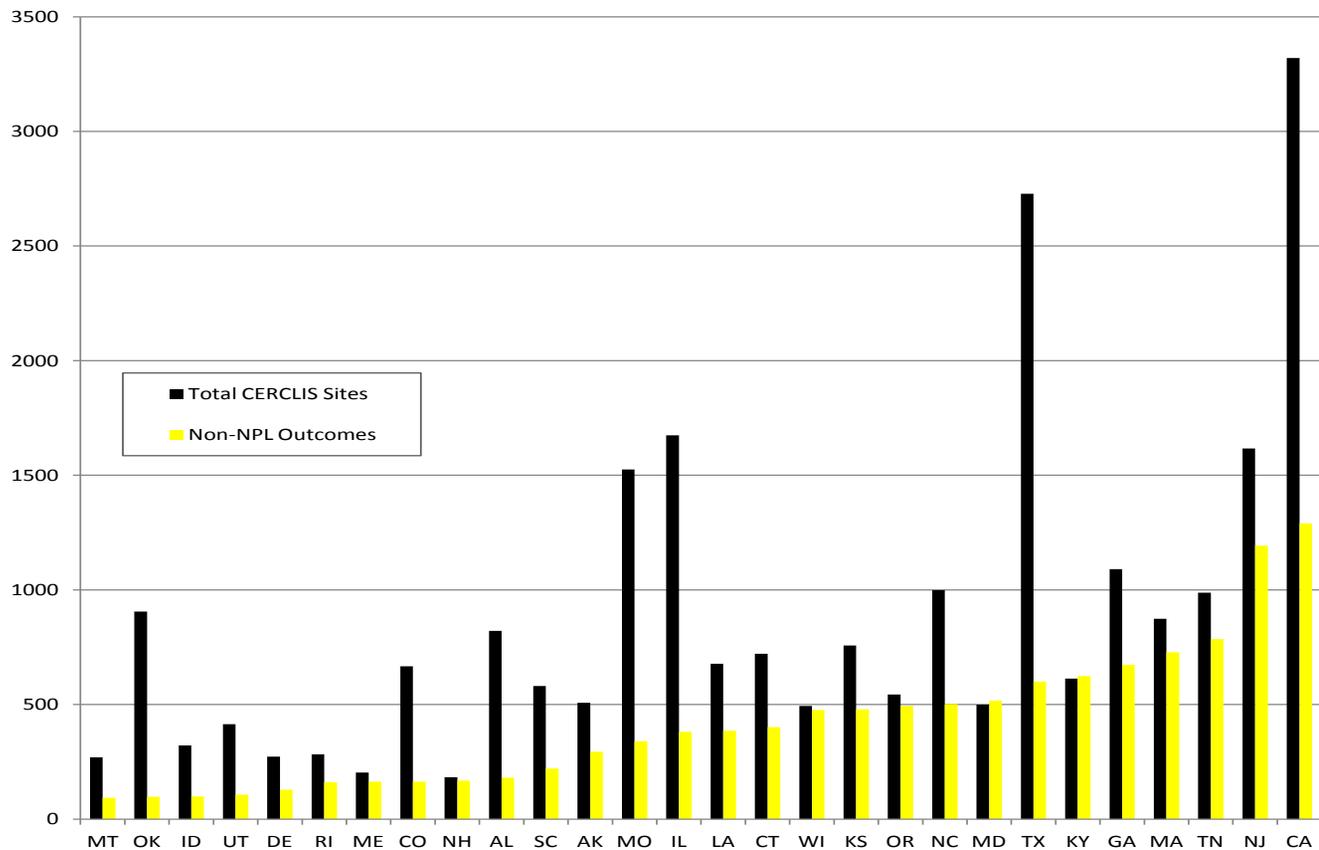
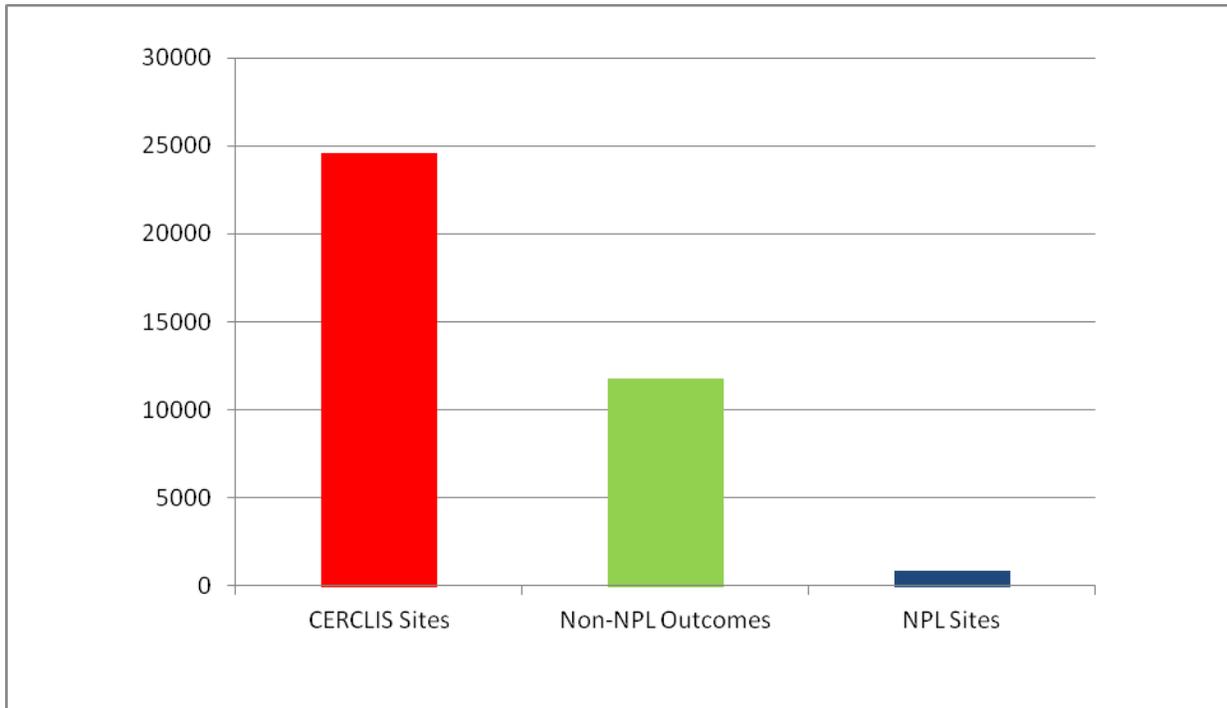


Figure 2
Superfund Site Assessment Program: Benefits Beyond NPL Listing
Breakdown of Sites - Phase I and Phase II



Conclusions

For many years, the management and staff of State and federal Site Assessment Programs have recognized that there are benefits associated with Superfund site assessments that go beyond the program's primary function of investigating sites for potential placement on the National Priorities List (NPL). Therefore, the ASTSWMO Site Evaluation Focus Group began research to develop a better understanding of non-NPL cleanup outcomes prompted by the Site Assessment Program.

During Phases I and II, 28 States provided the Focus Group data regarding: 1) the total number of State cleanups or closures that have been completed at sites in the CERCLIS database; 2) the total number of State cleanups or closures that were underway at sites in the CERCLIS database; and 3) the total number of federal non-NPL cleanups that have been completed or are underway at sites in the CERCLIS database.

The results provided by each of the participating States were compiled in the preceding section of this report. Although there were significant differences in the total number of cleanups undertaken by the participating States, the Phase I and II results suggest that the following conclusions can be drawn.

- In addition to the continued placement of sites on the NPL, all States that were contacted reported a significant amount of cleanup or closure actions have occurred or are currently ongoing at sites that were the subject of Superfund site assessment activities. State voluntary programs, State and federal removal programs, the Superfund Alternative Approach, and other State-and-industry-specific cleanup initiatives are those programs most commonly cited by the surveyed States. Of the total 24,551 sites on CERCLIS for the 28 reporting States, States report that 11,734 (or approximately 48 percent) non-NPL cleanup/closure actions have been completed or are underway. Of the remaining CERCLIS sites, 894 are on the NPL and 11,923 do not require cleanup or are still being assessed.
- All States that participated reported a significant number of State cleanups have been completed at sites that were previously investigated by the Site Assessment Program. The number of State cleanups completed ranged from 569 in Tennessee to three in Oklahoma. Of the total sites on CERCLIS for the 28 reporting States, 5,024 cleanups or closures (21 percent) have been completed through a State program.
- All States that participated also reported a significant number of State cleanups and closures are currently underway at sites that were previously investigated by the Site Assessment Program. The number of State cleanups in progress ranged from 772 in New Jersey to 3 in Utah. Of the total sites on CERCLIS for the 28 reporting States, 4,404 cleanups/closures (18 percent) are currently being addressed through a State cleanup program.
- All States that participated reported a significant number of federal non-NPL cleanups that have either occurred or are underway at sites that were previously investigated by the

Site Assessment Program. The total number of federal non-NPL cleanups that are either underway or complete range from 316 in California to 5 in Louisiana. Of the total sites on CERCLIS for the 28 reporting States, 2,306 cleanups (9 percent) have been completed through a federal non-NPL program.

- Because the participating States represented all EPA Regions, more than half of States nationwide, both large and small States, and States with well-established and less-established cleanup programs, it is reasonable to project on a nationwide basis the results from the data collection involving 28 States. Of the 43,088 sites⁵ currently on CERCLIS, it is estimated that cleanup or closure actions have occurred or are currently ongoing at 20,682 (48 percent) of the sites that were the subject of Superfund site assessment activities. As shown in Table 3, twenty-one percent (9,048 sites) are projected to have been cleaned up/closed through a State cleanup program and 7,756 (18 percent) State cleanups/closures are in progress. Nine percent, or 3,878 of CERCLIS sites, are estimated as having been or are being addressed by a federal non-NPL cleanup action.
- The Phase I results from nine states and Phase II results from 19 states were compared to determine whether there were significant differences between the two phases. This information is summarized in Table 3. The percentage of CERCLIS sites that are being addressed by a State cleanup/closure currently underway was 21 percent for Phase I and 17 percent for Phase II. For the percentage of CERCLIS sites that have been cleaned up or closed through a State program, the Phase I result was 21 percent and Phase II result was 20 percent. In Phase II, 11 percent of sites had a federal non-NPL cleanup completed or underway whereas Phase I had 6 percent. Both phases showed the same number of total non-NPL outcomes (*i.e.*, 48 percent). Based on these data, the differences do not appear significant and the total non-NPL outcome percentage was identical for both phases.

The results of this study demonstrate that, since its inception, the Site Assessment Program has directly or indirectly been responsible for creating a significant number of beneficial outcomes that reach far beyond its original purpose of cleaning up our nation's most significant hazardous waste sites. Consequently, the overall success of the program cannot and should not be measured solely by the number of NPL listings or cleanups. Many States have no other mechanism to investigate potentially hazardous sites that have a recalcitrant responsible party or no viable responsible party. The information provided by the Site Assessment Program is used by States to collect enough information to require a responsible party to undertake response actions or to determine what other source of funding is appropriate to address the site.

It is hoped that this research will enhance understanding of the overall accomplishments and successes of the Site Assessment Program by documenting that the program produces a broad spectrum of beneficial non-NPL outcomes far beyond its primary purpose of evaluating sites for inclusion on the NPL. These successes include environmental cleanups conducted under the

⁵ This number of CERCLIS sites excludes removal only sites and final, proposed and delisted NPL sites.

authority of various State voluntary and enforcement programs, State and federal removal programs, Superfund Alternative Approach, and other State-specific and industry-specific cleanup programs. Although these non-NPL outcomes have not been accounted for in the past, the numbers are significant and should be acknowledged.

Since it has been documented that the Site Assessment Program is a gateway to a myriad of state and federal cleanup programs, a reduction in funding of this program would in all likelihood have far-reaching effects and result in fewer NPL as well as non-NPL cleanups.

**Superfund Site Assessment Program: Benefits Beyond NPL Listing
Phase II**

State Respondents for Phase II Data Collection

Region	State	Contact	Number	Email
1	NH	Mike Wimsatt	(603) 271-6422	Michael.Wimsatt@des.nh.gov
1	RI	Cynthia Gianfrancesco	(603) 271-6422	Cynthia.Gianfrancesco@dem.ri.gov
1	CT	Pat DeRosa	(860) 424-3501	Pat.Derosa@ct.gov
1	ME	Kathy Howatt	(207) 287-2651	Kathy.Howatt@maine.gov
3	MD	Jim Carroll	(410) 537-3459	JCarroll@mde.state.md.us
4	GA	Andy Taft	(404) 657-8675	Andy.Taft@dnr.state.ga.us
4	TN	Jim Morrison	(615)532-0910	Jim.Morrison@tn.gov
4	AL	Larry Bryant	(334) 271-7771	jlb@adem.state.al.us
4	KY	Wesley Turner	(502) 564-6716	Wesley.Turner@ky.gov
4	SC	Jonathan McInnis	(803) 896-4061	Mcinnijg@dhec.sc.gov
5	WI	Mark Gordon	(608) 266-7278	Mark.Gordon@wisconsin.gov
6	TX	Melissa Cordell	(512) 239-2473	Melissa.Cordell@tceq.texas.gov
6	LA	John Halk	(225) 219-3190	John.Halk@la.gov
7	MO	Julieann Warren	(573) 751-1087	Julieann.Warren@dnr.mo.gov
8	CO	Barbara Nabors	(303) 692-3393	Barbara.Nabors@state.co.us
8	UT	Dale Urban	(801) 536-4145	DUrban@utah.gov
9	CA	Rita Kamat	(818) 717-6538	RKamat@dtsc.ca.gov
10	OR	Gil Wistar	(503) 229-5512	Wistar.Gil@deq.state.or.us
10	AK	Jennifer Roberts	(907) 269-7553	Jennifer.Roberts@alaska.gov

Note: Phase I survey respondents are identified in the Phase I report

**Superfund Site Assessment Program: Benefits Beyond NPL Listing
Phase II**

Data Collection Form and Instructions

ASTSWMO SURVEY

CERCLA and Brownfields Research Center

Site Evaluation Focus Group

Non-NPL Outcomes Resulting from the CERCLA Site

Assessment Program

March 2010

Introduction

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) Site Evaluation Focus Group is conducting the second phase of a study that will quantify the number of state and non-NPL federal cleanups/closures that have been initiated and/or completed for sites that were initially investigated by the CERCLA Site Assessment Program. The first phase of the study documented that the Site Assessment Program has been responsible for a significant number of beneficial outcomes that reach far beyond its primary purpose of evaluating sites for inclusion on the National Priorities List. The Site Evaluation Focus Group requests your assistance in responding to this survey in order to provide EPA and states with a more complete nationwide data set.

Purpose

The CERCLA Site Assessment Program has been the foundation of the national Superfund Program. Over time, it has become increasingly apparent that state involvement in CERCLA Site Assessment results in many beneficial outcomes. Today's CERCLA Site Assessment Program is truly the gateway to a myriad of federal and state remediation programs. Such programs include state Superfund, state voluntary, Superfund Alternative, state and federal removal programs, and other state-specific and industry-funded state cleanup programs (e.g., state dry cleaner programs). The Site Evaluation Focus Group will summarize the survey results and prepare a report. The report will assist EPA, the states and territories in evaluating the success and accomplishments of the state CERCLA Site Assessment Programs beyond the traditional metric of NPL listings.

The report summarizing the Phase I survey results will be posted shortly at www.astswmo.org. The US EPA headquarters has agreed to provide financial assistance to participating states to perform the research needed to respond to the Phase II survey. Up to \$8,000 is available per state. States should coordinate with EPA regional Site Assessment staff about how to access these funds through their cooperative agreement.

Instructions

Please complete the form on page 2. Instructions are included on the form. Please do not hesitate to contact your Site Evaluation Focus Group regional representative with any questions.

for (name of state inserted)

<p>Total Sites on CERCLIS</p> <p>Please let us know if your state records indicate significant deviations from the number of sites on the “Non-NPL Outcomes Study” worksheet that we provided for your reference.</p>	
<p>1. State Cleanups Complete</p> <p>Please record in the box at right how many state cleanup/closures have been completed for the sites included on the “Non-NPL Outcomes Study” worksheet. This category may include privately financed voluntary cleanups, state enforcement driven cleanups, state funded cleanups and cleanups funded through a specific industry program (e.g., dry cleaners fund).</p>	
<p>2. State Cleanups Underway</p> <p>Please record in the box at right how many state cleanup/closures are underway, but not yet complete, for the sites included on the “Non-NPL Outcomes Study” worksheet. This category may include privately financed voluntary cleanups, state enforcement driven cleanups, state funded cleanups and cleanups funded through a specific industry program (e.g., dry cleaners fund). Do not include a site in your count of State Cleanups Underway if you include it in your count of State Cleanups Complete.</p>	
<p>3. Federal Non NPL Cleanups Underway and Complete</p> <p>Please record in the box at right how many federal non-NPL cleanups/closures have been completed or are underway for the sites included on the “Non-NPL Outcomes Study” worksheet. This category includes federal removals, RCRA deferrals, Superfund Alternative sites, or other federal enforcement prompted by a CERCLA Site Assessment activity.</p>	

Thank you for completing this survey! Please return this form to your regional Site Evaluation Focus Group contact by August 30th.

Please complete the attached “**Non-NPL Outcomes Resulting from the CERCLA Site Assessment Program**’ summary form, and if possible the “**Non-NPL Outcomes Study worksheet**” for your State. Please return your responses to your ASTSWMO regional representative by August 30, 2010. The listing of the sites that are believed to be the subject of this survey has been included in the attached worksheet prepared by the staff of U.S. EPA Headquarters. A CERCLIS site listing report for your state will be included for your reference. Although some specifics are included in this instruction sheet, we realize that your state might have additional questions regarding the study, or need additional guidance. If you have any questions regarding the study, or are in need of additional guidance, please feel free to contact your ASTSWMO Site Evaluation Focus Group representative (list attached).

Total sites on CERCLIS

This number has been provided to you by your ASTSWMO Site Evaluation Focus Group regional representative. This total represents all active and archived sites within your state’s CERCLIS universe, but excludes: National Priorities List final, proposed and delisted sites. This total also excludes ‘Removal only’ sites that were placed on CERCLIS and have been evaluated only by the CERCLA Removal Program. The data was recently downloaded by USEPA’s Headquarters staff from CERCLIS. The download was selected to be consistent with the first phase of the Non-NPL Study. Please let your regional representative know if your state records indicate a significant deviation from the number of total sites that have been provided.

Counting State Cleanups Completed:

A site cleanup should be considered complete when the site has progressed to the point in the state cleanup process where a formal declaration of completion has been issued, or at a point where the state no longer deems the property a threat to human health or the environment.

This category may include sites at which additional assessment was conducted and your state’s cleanup program has determined that no remediation was required.

If a site was divided into separate units and cleanup/closure was completed at one of those units then include this site in your count of State Cleanups Completed. But please do not count the site twice if cleanup was completed at more than one unit. To avoid double counting of sites, do not include a site in your count of State Cleanups Underway if you include it in your count of State Cleanups Completed.

When completing the Non-NPL Outcomes Study worksheet, please indicate whether the State Cleanup Completion applies to the entire site or only to a portion of the site

Counting State Cleanup Underway:

A site cleanup should be considered underway when it is actively enrolled or being addressed in the state's cleanup program.

If a site was divided into separate units and one of those units are actively enrolled or being addressed in your state's cleanup program then includes this site in your count. But please do not count the site twice if cleanup is underway at more than one unit. Do not include a site in your count of State Cleanups Underway if you include it in your count of State Cleanups Complete.

Federal non-NPL Cleanups underway or completed:

This category is meant to include those federal removals, RCRA deferrals, Superfund Alternative sites, or other federal enforcement prompted by a CERCLA Site Assessment activity. For the purposes of this survey, it may helpful to first determine which federal removal or enforcement action has been preceded by some CERCLA Site Assessment activity. This can be accomplished by accessing the federal CERCLIS database and determining the timeline of actions for each site, by clicking on the "Actions" page. It has been our experience that this web page responds best when using Internet Explorer:

<http://www.epa.gov/superfund/sites/cursites/index.htm>

The information regarding federal non-NPL activities that has been included on your state's Non-NPL Outcomes Study worksheet has been assembled by Randy Hippen (703-603-8829) of USEPA Headquarters staff. All Non-NPL cleanup actions are noted by X's in one or more of the far right columns of this worksheet. In order to achieve an accurate count of all qualifying Non-NPL federal cleanups, it will be necessary to DELETE those X's denoting federal actions that did not result from a CERCLA Site Assessment activity.

If you have additional questions regarding federal Non-NPL activities please feel free to contact Randy, or your ASTSWMO regional representative.

The attached Non-NPL Outcomes Study worksheet:

We have attached an Excel worksheet to assist you as you go about the process of completing this study. This worksheet identifies all of the sites within your state that are the subject of this study. As you collect site specific information regarding these sites, please record it on this worksheet, and if possible, return it with your Non-NPL Outcomes Resulting from the CERCLA Site Assessment Program summary form.

**Superfund Site Assessment Program: Benefits Beyond NPL Listing
Phase II**

Example of Excel Worksheet Data Collection Form Provided to Participating States

(please place a "X" in appropriate column for each site)

Source of initial site list and Federal non-NPL cleanup data: CERCLIS (06-07-2010)

Name of Site	CERCLIS Site ID	Fed Fac	Archived	State Cleanup Complete		State Cleanup Underway	Federal Non NPL Cleanup ¹			
				On entire site	On portion of site		Removal	RCRA Deferral	SAA	Other Enf.
CANON CITY TOWN GAS	CO0001024553	N	Yes							
BR-TAYLOR PARK RESERVOIR	CO0001026111	Y	Yes							
WEST WILLOW CREEK	CO0001035427	N								
INDUSTRIAL HARD CHROME PLATING	CO0001055235	N	Yes				X			X
HANCOCK PLAZA LANDFILL	CO0001061464	N	Yes							
WESTERN ELECTRIC	CO0001066307	N	Yes							
FRENCH GULCH	CO0001093392	N					X			X
SWEENEY MILL	CO0001096791	N								
LMS DRILLING, INC.	CO0001098706	N	Yes							