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Interim Records of Decision Paper
ASTSWMO Remedial Action Focus Group
August 2017

Introduction/Purpose

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) is an association representing the waste management and remediation programs of the 50 States, five Territories and the District of Columbia (States). The ASTSWMO Remedial Action Focus Group of the CERCLA and Brownfields Subcommittee (CaBS) is comprised of members from all ten Environmental Protection Agency (EPA) Regions and was formed to research issues associated with the remediation of hazardous substance contamination at State and Federal Superfund sites. This document was prepared by the ASTSWMO Remedial Action Focus Group, with assistance from EPA OSRTI under Cooperative Agreement RT-83500901. The purpose of this paper is to provide information to States and to EPA regarding the use of Interim Records of Decision (Interim RODs) at sites subject to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) also known as Superfund.

A Record of Decision (ROD) is a public document that communicates which cleanup alternative was selected for a Superfund site and establishes enforceable cleanup levels for contaminated site cleanup efforts. These cleanup levels, along with other pertinent criteria, are known as applicable relevant and appropriate requirements (ARARs). Interim RODs are commonly used in advance of a Final ROD and may address the need for quick action to protect human health or the environment or implement temporary measures to prevent the further migration of contaminants. Interim RODs are subject to the same five-year review requirements as the Final ROD to ensure the Interim Action remains protective.

In 2017, the Focus Group received feedback from 33 States, 14 of which provided examples of Interim RODs that had been implemented at Superfund sites in their States. The States provided feedback on both the benefits and drawbacks of Interim RODs as well as discussion on how they fit into the overall cleanup process at Superfund sites.

This paper summarizes the feedback received from States, provides examples of sites where Interim RODs have been used, and identifies potential benefits and concerns for States to consider. Reference material and a full compilation of State survey responses are included as attachments.

Compliance with ARARs

One issue regarding the use of Interim RODs that may be considered both a benefit and a drawback is compliance with ARARs. State cleanup levels, Federal maximum contaminant levels, and other substantive environmental protection standards, requirements or criteria may be considered ARARs that are used to guide the cleanup process at Superfund sites and should be agreed upon for a Final ROD to be signed. When an Interim ROD is developed, compliance with ARARs may be waived until the Final ROD. This can benefit States by allowing for cleanup or partial cleanup at portions of a site without the requirement for ARARs to be met across the entire site, allowing for additional time for States to evaluate cleanup alternatives, develop new cleanup techniques, or negotiate final ARARs with EPA and other stakeholders.

Environmental contamination at some sites however may be so severe, impact widespread geographical areas, be prohibitively costly to cleanup, or beyond the capability of current cleanup techniques, that compliance with ARARs within a reasonable time frame is simply not possible. These situations can be difficult to explain to stakeholders and the use of Interim RODs may be seen as simply a way to avoid addressing some of the more difficult or controversial aspects of a Superfund cleanup project.

Final ARARs developed as appropriate for the scope of an Interim ROD, should at a minimum be discussed when an Interim ROD is proposed and the potential impact on compliance with final ARARs should be understood by all parties.

Potential Benefits to States

Interim RODs can be useful for simply acting early on a site to mitigate risk to human health and the environment, as a source-specific action that is part of a larger project, or in an effort to reduce costs by preventing the contaminant source from polluting a larger area. Interim RODs may also benefit States by spreading out capital project costs over several years.

Interim RODs are used primarily to allow for a portion of a site, or perhaps an operable unit (OU), to proceed through the remedial process while other portions of the site may need further investigation before a cleanup decision is possible. A common Interim ROD would involve acting on a source of contamination in soil while the investigation into the extent of the groundwater contamination continues. It is not uncommon for a groundwater investigation to require several phases that can take a longer period of time to complete. Meanwhile, a source of contamination in soil may be able to be defined relatively quickly, allowing for Remedial Action sooner and potentially reduce the long-term cost to clean up the site as a whole. In this scenario, an Interim

ROD would allow for action on the source to be initiated while the investigation into the extent of the groundwater contamination continues.

Interim RODs may also be used to manage discrete cleanup activities at large or complex sites. Rather than wait for a determination on potential cleanup methods across a large area Interim Action can be conducted at a portion of the site to mitigate current risk and potentially provide significant cost savings over the life of a project.

One example of a site where an Interim ROD was used to manage cleanup at a larger site is at the San Gabriel Superfund Site in California. The El Monte OU (EMOU) is one of eight OUs identified by EPA Region 9 for the San Gabriel Valley Superfund Site. The EMOU covers approximately 10 square miles in the south-central portion of the San Gabriel Basin in eastern Los Angeles County. Volatile organic compounds (VOCs) are the primary organic contaminants found above State and federal drinking water standards (most commonly tetrachloroethene (PCE) and trichloroethene (TCE)) in the EMOU. VOC impacts have necessitated that some drinking water production wells be shut down or equipped with wellhead treatment to reduce contaminant levels.

The EPA issued an Interim ROD in June 1999 for the EMOU which requires containment of groundwater contaminated with VOCs in the shallow and deep aquifers. The Interim ROD identifies performance criteria requiring extraction and treatment of VOC-contaminated groundwater at certain locations along the downgradient edge of the groundwater plume and requires continued monitoring and evaluation at other locations within the EMOU. In August 2002, EPA issued an Explanation of Significant Differences to the Interim ROD which incorporated treatment, as necessary, for newly detected chemicals in groundwater. This Remedial Action at the EMOU serves to protect receptors and prevent plume migration in the near term while the Final ROD is under development.

For more information concerning this site visit:

<https://cumulis.epa.gov/supercpad/cursites/csinfo.cfm?id=0901951>

If a State has limited funding available on an annual basis or if funding is derived from a low but steady revenue flow, the use of Interim RODs may help manage cash flow and/or take advantage of available funding. Actions at sites can be prioritized to meet project milestones and address the contamination posing the most significant threat first with the available funding. The use of Interim RODs may also alleviate public concerns typically associated with the long time frames sometimes necessary to complete all Remedial Actions needed. While States must be prepared to contribute their match funds to site Remedial Actions, the use of Interim RODs may help States project and more effectively manage these costs over the long-term.

Potential Concerns of States

Interim RODs can be an effective tool for implementing Remedial Actions in an expedited timeframe to address immediate threats to human health and the environment. However, a number of concerns and drawbacks associated with the use of Interim RODs have been identified by the States.

The Remedial Actions often associated with an Interim ROD are typically intended to address the most apparent and significant risks posed by contamination at and emanating from sites. However, these actions may be taken before completion of the Remedial Investigation and Feasibility Study (RI/FS). Although preparation of a RI/FS report is not required for an Interim ROD, there must be documentation that supports the rationale for the action to fulfill the National Contingency Plan (NCP) administrative record requirements. States must be diligent and ensure that appropriate data and information exists such that the selected Remedial Actions included in Interim RODs will accurately target contaminant source areas. Without completion of a RI/FS prior to the Interim ROD, site characterization is often incomplete, a robust Conceptual Site Model is not developed and a remediation endpoint is not set until the Final ROD. In these situations, it can be difficult to evaluate the effectiveness of Interim Actions in addressing the overall remedial requirements at sites. While Interim RODs should have measurable RAO's, there may be other exposure routes or contaminant source areas that are not fully understood in the absence of the RI/FS.

At the Garvey Elevator Superfund Site in Nebraska, an Interim ROD was signed in 2010 to address an underground piping leak that resulted in the release of carbon tetrachloride and carbon disulfide to the drinking water aquifer. The responsible party installed a groundwater extraction and treatment system and a soil vapor extraction system 1999 to address the most significant risks at the site. The site was listed on the NPL in 2005 and Garvey Elevator filed for bankruptcy in 2008.

In 2010, an Interim ROD was signed for the source area, OU-1, that included expansion of the groundwater and soil vapor extraction systems and institutional controls (ICs). Another Interim ROD was signed in 2013 to provide for the excavation of contaminated soil from the source area and further expansion of the soil vapor extraction system, as well as groundwater extraction and treatment from the groundwater plume, known as OU-2.

Concerns expressed by the State include a lack of adequate site characterization to identify other potential sources areas that may be contributing to groundwater contamination at the site and the ongoing requirement for treatment system operation. Additional source areas that may be present will necessitate operation of the treatment systems by the State for much longer periods than may have been anticipated. Discussions between the State and EPA regarding the final remedy are ongoing.

More information can be found about this site at:

<https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0704351&msspp=med>

Another remedial strategy employed using Interim RODs are engineered temporary caps. These structures serve to mitigate direct exposure to contaminants, but may be constructed in the absence of a thorough understanding of site conditions that may affect their long-term utility. States may then be burdened with the costs to maintain them for a long period of time until a final remedy is determined.

Another concern expressed by the States is the equitable application of Interim RODs versus Removal Actions. Even within a single region, different States have observed the use of EPA-funded Removal Actions to complete the same tasks implemented by Interim RODs at similar sites in other States. Removal Actions do not require the same State match for Interim Actions so some States may feel forced to contribute or use limited State funds for the same activities that are funded solely by EPA in other States.

A final concern expressed by the States is the postponement of certain tools until completion of the Final ROD. An example is that while ICs can be employed during Interim RODs to control exposure routes, they are often delayed until implementation of the Final RODs.

Conclusions

There are many challenges associated with Remedial Action at Superfund sites. The use of an Interim ROD is an option that can expedite Remedial Actions to address immediate threats to human health and the environment or achieve other near-term goals. Based on the feedback received from the States, there are numerous and varied criteria that should be evaluated when deciding what or if, Interim Remedial Action is appropriate at a given site including:

1. Risk- Will the Interim ROD address/prioritize an immediate or ongoing risk? How will the Interim ROD contribute to the overall risk reduction once the final remedy is implemented?
2. Cost- Will the cost of an Interim ROD reduce or potentially increase the long-term cost of site remediation? Will an Interim ROD result in ongoing costs and is the State prepared to pay those costs and for how long?
3. Effectiveness- How will the Interim ROD be incorporated into the final remedy at the site or could it potentially reduce the need for additional action?
4. Compliance with ARARs- What impacts could the Interim ROD have on final ARARs and are these impacts understood by all stakeholders?

Considering the current and recent historical use of Interim RODs and the significant challenges that remain at Superfund sites across the country, the use of Interim RODs is expected to continue and may increase. When an Interim ROD is proposed, the benefits and drawbacks of the impact of

the Interim ROD should be evaluated and considered before determining if this is the best approach for a site. Current EPA guidance on the use of Interim RODs was written in 1999 and since that time, States, EPA, and other stakeholders have learned valuable lessons as sites proceed through the CERCLA process and all of these parties would likely benefit from updated guidance on the use of Interim RODs and updated definitions of different terminology that has been used for Interim Actions and Early Actions.

References

U.S. EPA 1999, Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents. OSWER-9200.1-23P. July 1999.

U.S. EPA 1994, Guidance on Accelerating CERCLA Environmental Restoration at Federal Facilities. August 22, 1994.

U.S. EPA 2011, Close Out Procedures for National Priorities List Sites. OSWER 9320.2-22. May 2011.

U.S. EPA 2017, Guidance for Management of Superfund Remedies in Post Construction. OLEM 9200.3-105. February 2017.

State Feedback on Interim RODS

In 2017, the Focus Group asked States if they have experience with Interim RODs and if they have any concerns or comments about Interim RODs. The Focus Group received feedback from 33 States, 14 of which provided examples of Interim RODs that had been implemented at Superfund sites in their States. The States provided feedback on both the benefits and drawbacks of Interim RODs as well as discussion on how they fit into the overall cleanup process at Superfund sites. The responses received by the States may not be reflective of EPA's perspective.

State	Interim RODs	Comments:
Alaska	Not recently	The last ones were in the 1990's. No real issues, though some stakeholders thought it might have delayed a final remedy.
American Samoa	No Interim RODs reported.	
Arizona	Motorola 52 nd Street Superfund Site- Operable Unit Two EPA and ADEQ issued an Interim ROD in 1994. A treatment system was put in place in 2001. The Final ROD is pending a vapor intrusion investigation. 5-Year Reviews are being conducted under the Interim ROD.	
Arkansas	No Interim RODs issued.	None raised

State	Interim RODs	Comments:
California	30 Interim RODs reported (³ 16 Non-EPA, ⁴ 14 EPA).	<p>Notes</p> <p>¹ Based on data from obtained from https://www.epa.gov/superfund/search-superfund-decision-documents on 2/1/17.</p> <p>² Title of document includes reference to "Interim", such as Interim Record of Decision or Interim Action.</p> <p>³ Interim Decisions or Actions for sites where a federal agency (other than EPA) is likely the lead agency (based on Site Name). This may include Department of Defense (DOD), Department of Energy (DOE), National Aeronautics and Space Administration (NASA), etc.</p> <p>⁴ Interim Decisions or Actions for sites where EPA is likely the lead agency (Site Name does not include a federal agency designation).</p>
Colorado	<p>No Interim RODs issued.</p> <ul style="list-style-type: none"> • Current conversations ongoing with EPA Region 8 for two possible Interim RODs. One Interim ROD (or Early Action ROD since it will be the final remedy for a portion of the site) at Colorado Smelter. 	<p>Potential concern – EPA and Colorado are working through issues regarding the timing of requiring and implementing ICs for Interim and Early Actions. EPA’s recent lead policy has created uncertainty on final cleanup levels for sites were lead is a contaminate of concern. The other issue we have run up against is the cost uncertainty, but that may due to the uncertainty in final cleanup levels as a result of EPA’s recent lead policy rather that a function of an Interim ROD.</p>
Delaware	<p>No Interim RODs issued.</p> <ul style="list-style-type: none"> • Have historically utilized EPA Removal Program to address threat. 	<p>Potential concern – If continue to utilize removal program to address the largest threat to human health and the environment, it may cause a facility to no longer score on the NPL or could substantially reduce EPA future funding for the facility.</p>

State	Interim RODs	Comments:
Guam	No Interim RODs reported.	
Hawaii	No Interim RODs reported.	
Idaho	Yes, five Interim RODs and one Interim ROD Amendment for Bunker Hill.	<p>All positive experiences “Interim RODs are an effective tool toward moving ahead quickly with Remedial Action on aspects where we can all agree. All of the Interim actions have been consistent with the final action and some became the final action.”</p> <p>Bunker Hill Interim ROD Amendment allowed for immediate action while there was opposition to comprehensive ROD.</p>
Indiana	One Interim ROD since 2010.	No substantially positive or negative impacts
Kansas	No Interim RODs issued.	<p>Kansas is in favor of using Interim RODs to address source control prior to the completion of the RI/FS. Kansas’ concern is the use of Interim RODs for groundwater controls when operation could extend past LTRA before the source is addressed. The concern is based on observances of other States where once the technologies were implemented, the timeline of events for the completion of the RI/FS and final remedy selection seems to be delayed. This would leave the State on the hook for long-term O&M of the pump & treat system with no final remedy in site.</p>

State	Interim RODs	Comments:
Louisiana	No Interim RODs yet – but is considering doing one on a new Superfund site to address the immediate threats.	Potential Benefit - Doesn't want to have to wait for the funding to address all environmental issues at the site to be able to address immediate threats.
Michigan	<p>EPA has issued 3 Interim RODs since 2010:</p> <p>1) DSC McLouth Steel Gibraltar Plant, 9/2/2016;</p> <p>2) Ten Mile Drain, 5/16/2014</p> <p>3) Ten Mile Drain, 9/27/2011</p>	<p>Michigan has not seen an increase in the use of Interim RODs for sites in Michigan. Michigan's experience with EPA's recent use of Interim RODs has been positive.</p> <p>Interim RODs have been used when appropriate given site-specific circumstances (fairly infrequently). The actions taken were truly interim and all parties agreed with the approach (these are all fund lead projects). There is no O&M with any of these Interim Actions so we have not had any issues with LTRA time frames. Two of these Interim RODs involve ongoing actions so the Interim Action may actually serve as incentive to EPA to get to the final remedy quicker so the Interim action can end.</p>
Minnesota	We have not had an Interim ROD since 2010.	This is not to say MN is not interested in the process, as there are sites heading towards potential NPL consideration that may need these once listed.
Missouri	<p>Two Interim RODs reported.</p> <p>1 Interim ROD for OU3 at the Madison County Mines Superfund Site to address residential property soil contamination signed in July 2008.</p>	In Madison County Mines OU3, residential properties were addressed by the Interim ROD to expedite soil removal of lead-contaminated residential soil exceeding 400 ppm at an estimated 1,100 residential properties. The Final ROD for OU3, dated September 2014, is a continuation of the Interim ROD response actions.

State	Interim RODs	Comments:
	1 ROD for Interim Action for OU1 at the Oak Grove Village Well Superfund Site to address private wells impacted by trichloroethylene contamination in groundwater. Signed in September 2007.	The Oak Grove Village Well OU1 Interim ROD—which provided treatment systems on private wells—is intended to provide adequate protection until a Final ROD is signed.
Montana	<p>Multiple Interim RODs</p> <ul style="list-style-type: none"> • The Basin Watershed Interim ROD was signed in 2015. The Interim ROD is to address AMD and mine wastes at only two sites within the watershed. • The Warm Springs Ponds Interim ROD was signed in 1990. The Interim ROD establishes that the Warm Springs Ponds was to act as a safety buffer for pollutant load downstream do to the number of sites upgradient of the facility. 	<p>Potential Concern – Lack of Remedial Action funding and significant under-estimation of Remedial Action costs are leading to a re-evaluation of how the Interim ROD can be implemented for the two primary sites addressed in Basin Watershed ROD.</p> <p>Potential Benefit – for the WSP Interim ROD, the WSP facility was upgraded to treat impacted surface water until other upgradient Remedial Actions are completed and functioning. However, the treatment system has been implicated in the generation of ammonia and arsenic releases but the issues of these unintended consequences have been raised in recent Five-Year Reviews and are being addressed through operational optimization.</p>
Navajo Nation	No Interim RODs reported.	

State	Interim RODs	Comments:
Nebraska	<p data-bbox="405 240 1064 440">Garvey Elevator OU1 Interim ROD was signed in June 2010 to address contaminated soils and groundwater beneath the grain storage facility using a groundwater extraction and treatment system</p> <p data-bbox="405 532 1064 816">Garvey Elevator OU1 & OU2 Interim ROD was signed in September 2013 to address contaminated soils (OU1) and contaminated groundwater (OU2) attributed to the Garvey elevator. Contaminated soils were excavated or addressed with an SVE system. Groundwater extraction consisted of 12 recovery wells and ex situ treatment.</p> <p data-bbox="405 873 1064 1027">Parkview Well OU1 Interim ROD was signed in September 2006 to address private and public drinking water wells impacted by the groundwater plume.</p> <p data-bbox="405 1084 1064 1317">Omaha Lead OU1 Interim ROD was signed in December 2004 to address residential property soil contamination. Excavation of residential soils exceeding 800 ppm lead at ~5,600 residential properties and properties exceeding 400 ppm lead considered high-child-impact areas.</p>	<p data-bbox="1106 240 1925 440">Garvey 2010 Interim ROD: Provide remedy for a former VCP site which filed bankruptcy and was listed on NPL; continued operation of remedial systems while Final ROD was years away. Provided mechanism to fund existing groundwater remedial systems.</p> <p data-bbox="1106 492 1925 651">Garvey 2013 Interim ROD: Potential concern – still evaluating the final remedy (aggressive direct treatment of source vs. long-term groundwater P&T source remedy). LTRA clock start before full remedy is in place.</p> <p data-bbox="1106 703 1925 902">General comment: In favor of using future Interim RODs to address source controls while completing groundwater delineation. Would be opposed to Interim RODs for groundwater restoration which would trigger LTRA before source controls are completed.</p>

State	Interim RODs	Comments:
Nevada	No Interim RODs reported.	
New Mexico	No Interim RODs issued.	None raised
New Jersey	NJ encourages EPA to issue Operable Unit RODs in order to get action started on a project as soon as possible.	Our 10% match is NOT appropriated on a site specific basis so NJ is able to fund projects as needed. SSC amendments increasing costs are routine.
New York	New York does not do Interim RODs	
Ohio	<p>One Interim ROD (currently in FFS status)</p> <p>East Troy Contaminated Aquifer (ETCA) – multiple plumes (residential area and commercial area) with both GW and VI issues.</p>	<p>EPA issued Final RI in Jan 2015, then Draft FS July 2015; Ohio EPA had significant comments, and EPA opted to go with a Focused FS (Draft issued in Jan 2017) leading to an Interim ROD. Reason for change to Interim ROD (Interim Action) is that the nature/extent of contamination caused by site setting have significant influence on estimated timeframes that will be required to achieve all RAOs for all areas/pathways. Establishing Focused (Interim) RAOs to prioritize reduction of exposure risk (VI) and reduction in contaminant mass. The FFS and IA do not supplant an FS and Final ROD. Scope of IA does not include complete restoration of the aquifer to “beneficial use”. The Final FS, proposed plan, ROD and Remedial Action (RA) will be completed after implementation of the IA. The effectiveness of the IA in meeting the Interim RAOs will be monitored and the Final FS/ROD/RA may be implemented at any future time.</p>

State	Interim RODs	Comments:
Oklahoma	No Interim RODs issued.	Concerned that Interim ROD could delay indefinitely the final remedy for the site.
Oregon	Yes, at numerous sites.	Oregon is a proponent of Interim RODs/early actions. Interim Action to remove source material or establish hydraulic control to stabilize and limit ongoing releases. Early Action implementation provides information that aids with the design and evaluation of Final Remedial Action alternatives and related adaptive management elements and decision criteria. Early Actions can offset stakeholder and community concerns where delays occur in getting to a Final ROD in cases where remedial options developed by responsible parties have data gaps that raise uncertainties in final remedy selection.
Pennsylvania	<p>2 Interim RODs</p> <ul style="list-style-type: none"> • PA first Interim ROD addressed discrete objects in a portion of an OU of the Safety Light Site. The remainder of the OU will be addressed in future response actions and document in the Final ROD. EPA decided to use this early interim approach in order to expediently convert an ongoing Removal action to an Early-Interim Remedial Action. • Second Interim ROD was for the Chem Fab site. The Interim ROD is for OU2 that will construct an extraction/treatment system to remove groundwater from the areas of highest contamination to prevent the migration of contamination outside the 	Potential Concern – Moving into a Remedial Action will keep work moving forward at the site, however it triggers the State’s requirement to chip in 10% and that is the State’s biggest concern.

State	Interim RODs	Comments:
	<p>area of concern. The impacted groundwater will be treated and discharged to Cooks Run while performing long –term monitoring. The State concurs with this Interim ROD.</p>	
South Dakota	<p>2 Interim RODS prior to 2001</p> <ul style="list-style-type: none"> • There are currently two Interim RODs in place in South Dakota, both are at the Gilt Edge Mine Superfund site. They were signed in 2001. One is to upgrade the water treatment plant (and site O&M) and the other is for capping the waste rock dump. The Interim water treatment plant ROD was written as interim because of the need for modifications to the new water treatment plant before the site is completed. So, until the three open pits are filled, capped and the final acid rock drainage quality and quantity is known, modifications to the water treatment plant can't be made until then with a Final ROD. 	<p>The benefit to an Interim ROD in this case is it gets started on a remedy for the current situation. The other Interim ROD for the waste rock dump is similar. The ROD enabled the waste rock dump cap to be substantially completed but since the dump cap needs to be integrated into the final site-wide remedy of filling and capping the three open pits, it was an Interim ROD. The lesson is the same, it got the dump cap started and substantially completed until the Final site-wide ROD is completed.</p>
Texas	No Interim RODs issued.	None raised
Utah	<p>No Interim RODS after 1998 issued.</p> <ul style="list-style-type: none"> • A couple of Interim Action RODs have been issued for federal facility sites in Utah. One was for an Interim Action at OU III of the Monticello Mills site (August 1998), which is a DOE facility. The other 	<p>EPA has not issued any Interim RODs in Utah since 1998. They served their purpose at the time. Interim RODs can address certain issues prior to a final decision at a site, but they may require just as much effort to write and approve as any other ROD. We generally work with EPA and PRPs (including</p>

State	Interim RODs	Comments:
	<p>was issued for Hill Air Force Base OU8 (May 1998). Under the Interim ROD for Monticello Mills OU III a full-scale treatability study of in-situ permeable reactive barrier (PRB) treatment using zero-valent iron was conducted for a uranium ground water plume. The Hill AFB OU8 Interim ROD required hydraulic containment of a chlorinated solvent ground water plume at the base boundary. The Interim Actions were incorporated and/or modified in subsequent RODs/ESDs.</p>	<p>federal facilities) to address any needed interim measures through Removal Actions, rather than Interim Remedial Actions. Removal Actions require only an action memorandum and they don't require a State cost share or other assurances.</p>
Virginia	<p>No Interim RODs issued at Superfund sites in Virginia. However, there have been Interim RODs implemented at multiple Federal Facilities sites in Virginia.</p> <ul style="list-style-type: none"> • An Interim ROD is being considered at the Culpeper Wood Site (currently in the RIFS stage). The Interim Remedy would be installation of public water lines in the area while the onsite remedy is being evaluated. 	<p>EPA is currently evaluating if an Interim ROD will be issued or work will be performed under their removal authority.</p>
Washington	<p>Yes, two examples provided, Moses Lake Wellfield (signed) and Wykoff (under development).</p>	<p>Some advantages of Interim RODs appear to be that, 1) they get the cleanup started, 2) EPA and the State don't need to lock in on ARARS, and 3) there is the possibility that during the cleanup the State may be able to turn the site back over to the EPA as part of a new Remedial Action, if necessary.</p>

State	Interim RODs	Comments:
		For 2) and 3), under an Interim ROD, EPA and the State can monitor the work to see if ARARs are met, and take time to see if the cleanup meets the operational and functional requirements.
West Virginia	No Interim ROD within the State.	There are no potential concerns by the State at this time as Interim RODs have not been discussed at any of the NPL facilities within the State.
Wisconsin	WI is unaware of any Interim RODs initiated in WI since 2010. WI had a few of these in the past, before 2010.	When the State of Wisconsin's input was considered and used, the impact was generally positive and Interim Actions were completed likely years before a complete, comprehensive remedy could be selected and implemented. WI is unaware of the use of Interim Actions at WI fund-financed sites where it would affect the LTRA period.