

NCP Issues for Comments

- CTL018748

subsequently agrees to perform RD/RA pursuant to consent decree. *(preferred option)*

- I
- 51420 o Appropriate method for identifying problem sites, if those sites are not proposed for the NPL because of deferral to CERCLA enforcement agreement.

- 51421 o Deferring placement of sites on NPL when other authorities are available to address contamination at the site and deferring sites when PRPs have signed enforceable CERCLA consent orders.

- 51421-2 o Deleting final sites based upon deferral to other authorities/criteria

- 51426 o Risk ranges - two in particular
- current 10^{-4} to 10^{-5}
- alternative 10^{-4} to 10^{-6}
- issues related to these or alternative risk ranges

- 51431 o Potential advantages and disadvantages of alternative site-specific balancing approaches related to
- type of criteria considered
- steps for making statutory findings
- degree of proposed structure *

- 51431 o Two alternative approaches are
- site specific balancing with a cost-effectiveness screen
- sequential decision making approach *

- 51432 o Appropriateness and desirability of pursuing one of the following alternative strategies
- point of departure *
- site stabilization *

- 51432 o Potential advantages and disadvantages of the following analytical techniques
- screening against threshold criteria
- pairwise comparison
- ranking alternatives or criteria
- scoring (measuring alternatives against a consistent scale)
- weighting alternatives or criteria
- construction of a multi-attribute model

cont'd

306.430

*RI/FS &
Remedy
Selection
[KUSSEI]
generally*

- III
- 51433-5 o Groundwater remediation approach
- 51436 o Criteria for ARARs
- IV
- 51439-40 o Waiver of ARARs
 - interim remedy
 - equivalent performance
 - fund balancing - specific amount
- 51440 o Where ARARs must and TBCs should be attained *
- V
- 51450-2 o Community relations/public comment
- 51452-3 o Community relations during RD/RA phases
- 51454 o Interpretation of "restore ground and surface water quality" and on the merits of alternatives EPA has not adopted.
- Nobody
- 51454 o Whether ten year O&M rule should extend to situations where primary purpose of ground water treatment is to provide drinking water supplies from water contaminated at the site without restoring it.
- 300.435
RD/RA
O&M
- 51454 -
51455 o Appropriateness of requiring regions to enter into SMOAs if states request them and have demonstrated capability to take the lead for response action.
- 51456 o Comment on criteria for state lead designation
 - overall expertise
 - legal authorities
 - administrative and contracting capability
 - financial management systems
 - availability of general resources
 - complexity of site
 - availability of site-specific resources
 - workload and expertise
 - past Federal and State actions at the site
 - past State cleanup activity
 (should other criteria be added?)
- VI
- State Role
F
- 51461 o Subpart H comments
 - consistency with NCP for private party cleanups
- VII
- 51468 o Should a notice of availability of administrative record or of commencement of public comment period be published in the Federal Register? (administrative record for remedial action) *
- V
- Participation
By Others
H
- Admin Record
I
- [Quarles]
- cont'd

- V
- 51469 o Should public comment be solicited on activities that have already been completed at the time the record is made available? (administrative record for removal action) *
- 51469-70 o Comment on approaches to developing administrative record for removal actions. *
- 51470 o Comment on adding documents to record after selection of response action. *
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