

US EPA ARCHIVE DOCUMENT

**BROWNFIELDS CLEANUP REVOLVING LOAN FUND
NON-TIME CRITICAL REMOVAL ACTION
OUTLINE**

TASK	LEAD AGENCY	BSM	BORROWER
<i>Designates Community Relations Spokesperson</i>	✓		
<i>Conducts Community Interviews</i>	✓		
<i>Establishes info repository and maintains administrative record for the site.</i> <ul style="list-style-type: none"> ■ The repository must be established no later than the signing of the EE/CA approval memo. 	✓		
<i>Certifies that the borrower is not a PRP.</i>	✓		
<i>Drafts Engineering Evaluation /Cost Analysis (EE/CA) Approval Memo (8 -16 hours)</i> <ul style="list-style-type: none"> ■ Documents that the situation meets the NCP criteria for initiating a removal action and that the proposed action is non-time-critical. ■ Provides detailed information pertaining to site background; threats to public health, welfare, or the environment posed by the site; enforcement activities; and projected costs. ■ Drafted using information provided by the borrower (i.e. Phase I and Phase II Reports). 		✓	
<i>Signs off on EE/CA approval memo</i> <ul style="list-style-type: none"> ■ This must be done prior to making a loan 	✓		
<i>Prepares a Community Relations Plan</i> <ul style="list-style-type: none"> ■ The CRP must be prepared before the EE/CA is complete. 	✓		
<i>Drafts Engineering Evaluation/ Cost Analysis (EE/CA)</i> <ul style="list-style-type: none"> ■ The EE/CA identifies the objectives of the removal action and provides an analysis of alternatives 			✓
<i>Reviews & comments on draft EE/CA developed by borrower (24 -40 hours).</i>		✓	
<i>Revises EE/CA if necessary.</i>			✓
<i>Provides public notice of availability of EE/CA and conducts 30 Day public comment period.</i> <ul style="list-style-type: none"> ■ The public notice describes the preferred alternative and EE/CA results. 	✓		
<i>Ensures that public participation requirements are met (8 hours)</i>		✓	
<i>Drafts Action Memo (16-24 hours)</i> <ul style="list-style-type: none"> ■ Substantiates the need for a removal action, identifies the proposed action, and explains the rationale for the removal action selection. ■ Contains a response to the public comments on the EE/CA. ■ Drafted using information provided by the borrower 		✓	

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TASK	LEAD AGENCY	BSM	BORROWER
<i>Signs off on Action Memo</i>	✓		
<i>Prepares design & construction plans</i>			✓
<i>Reviews & comments on design and construction plans developed by borrower(24-40 hours)</i>		✓	
<i>Sends approval letter for final design and construction plans</i>	✓		
<i>Conducts periodic site visits during implementation (24 -40 hours)</i> <ul style="list-style-type: none"> ■ To insure compliance with approved plans. ■ To insure that all staff working on the response know site operating and safety procedures. 		✓	
<i>Drafts an OSC Report at the conclusion of the removal action. (16 -24 hours)</i> <ul style="list-style-type: none"> ■ Drafted using information provided by the borrower 		✓	