

**FY 10 SPIM
Change Log
October 1, 2009**

SPIM Section	Comment Provided By	Change Description
Chapter 1		
I.A.	Janet Weiner	Updated the language of the last paragraph.
Chapter 2		
Exhibit II.1.	Alice Ludington	Under 'March/Current Year Budget' inserted, "3rd quarter response SAs and remaining call memo for enforcement SA issued."
II.C.2.d.	Alice Ludington	In the title add (302EC7) after Superfund Enforcement to be consistent with the other sections.
II.D.5.	Alice Ludington	2nd paragraph/first sentence - delete the words - 'for technical enforcement' and end the sentence after fiscal year. 3rd paragraph - Please delete the first two sentences. Leave the last sentence that starts 'Funds must not move...'
II.F.2.	Alice Ludington	I believe that in the last bullet the ODN stands for obligating document number, not OSWER Directive number.
II.H.1.b.	Eric French	Under 'Enforcement Support Services (ESS)/Zone Enforcement Support Services(ZESS)': Change the second bullet to: Regions issue task orders against the contracts on a site-specific basis Change the third bullet to: Site-specific task orders are not entered into IFMS Change the seventh bullet to RPOs and CORs may conduct concurrent reviews.
II.I.	Eric French	In second paragraph, replace Regional SFO with Regional Comptrollers's office.
II.I.1.	Eric French	Replace entire section with new language.
II.I.2.	Eric French	Replace entire section with new language.
II.I.4.	Eric French	Change second bullet to the following: Financial files are maintained by the Regional Comptroller's office until two years after all cost recovery litigation is complete.
II.I.5.	Eric French	Replace paragraph with the following: EPA incurs costs that are attributable to individual Superfund sites and indirect costs which support the operation of the Superfund program in general. By definition, indirect costs are costs that support site cleanups, but cannot be directly attributed to an individual site. Indirect cost rates are computed annually
II.I.6.	Eric French	Replace entire paragraph with the following: The Annual Allocation Reporting Process was implemented to allow the Agency to capture Superfund site-related contract costs consistently and accurately for the purpose of cost recovery and external reporting. This process is the means by which administrative and other non-site costs (program management, capital equipment, start-up and site-supported costs) are redistributed or allocated to the appropriate Superfund sites. The process requires that the contractors follow a documented methodology for allocating certain non-site specific costs to sites and submit an annual allocation report.

**FY 10 SPIM
Change Log
October 1, 2009**

SPIM Section	Comment Provided By	Change Description
Chapter 3		
III.B.	Janet Weiner	Updated language throughout this section to reflect the Agency's current performance goals and measures.
III.C.	Janet Weiner	Replace paragraph 1 with the following: Within the Superfund Program, accomplishment of Annual Targets for GPRA performance measures and targets for Programmatic Measures are principally tracked through the CERCLIS database. CERCLIS is the Superfund program's primary repository of program planning and accomplishment data, including resource planning estimates and program targets and measures. CERCLIS contains removal, site assessment, remedial, Federal facility, and enforcement program data. SCAP (Superfund Comprehensive Accomplishments Plan) reports provide summary and detail information on site progress, target and measure accomplishments, and resource planning and use.
III.D.1.a.	Janet Weiner	Replace paragraph 2 with the following: The region's focus in workplanning should be on its individual pipeline (e.g., more site assessments or more construction completion oriented), the overall goals and priorities of the program including GPRA Annual Targets, and how it can achieve its portion of the national effort given proposed resources. Headquarters compares regional plans with program goals and resource allocations. In addition, headquarters reviews past regional accomplishments, historical obligation trends, and planned durations/dollars to ensure that the region is planning the appropriate amount of work given the dollars it is requesting. This provides headquarters with a benchmark going into workplanning on what the region should be able to accomplish based on its unique pipeline status.
Exhibit III.1.	Janet Weiner	For the first HQ bullet substitute the following: Negotiating with regions to set 10 regional subtargets which total to the national GPRA Annual Target for each GPRA performance measure.
III.E.5	Randy Hippen	Change title of section from OSRTI Regional Branches to OSRTI Regional Support Regional branch text reflects old organizational structure. Please change to: 'OSRTI's Assessment and Remediation Division (ARD) generally includes the primary contacts for regions regarding site-specific issues of all natures and is often the primary conduit to regions for communicating and interpreting national policies. With respect to CERCLIS data, ARD subject matter experts and/or data sponsors:'
III.H.2.	Janet Weiner	Remove reference to OCFO and ACS process in first paragraph.
Exhibit III.7.	Randy Hippen	Replace Steven Chang as RODs/Remedy Selection sme with Randy Hippen (703) 603-8829 hippen.randy@epa.gov Delete or replace Charles Sands with a different SME.
Appendix A		
A.D.	Randy Hippen	Replace SPIM reference number in 4th bullit of last section to 9200.3-14-1G-T or to whatever the number will be for the next release.
A.D.	Randy Hippen	Modify 1st bullit under FADs to read: The site or its parent site has been proposed to or placed on the National Priorities List (NPL)
A.D.	Randy Hippen	Delete last sentence in 2nd paragraph: (By the end of FY 2007, a total of 39,766 final site assessment decisions had been made.)

**FY 10 SPIM
Change Log
October 1, 2009**

SPIM Section	Comment Provided By	Change Description
A.D.	Janet Weiner	Add a sentence to paragraph 3 that states the FADs is a GPRA performance measure. Consider retitling this section to remove reference to GPRA.
A.E.	Randy Hippen	Modify last sentence under Final Assessment Decision (FAD) to read: HQ will place a check in the FAD checkbox when updating CERCLIS for sites, including associated child sites that get proposed to the NPL.
A.G.6.	Randy Hippen	Add following sentence to end of this section: The Final Assessment Decision value for a child site should match that of its parent site.
Exhibit A.2.	Randy Hippen	Add check mark under Recommended for HRS Scoring (G) to the following rows: PA, RX, SI, OO, TY, VA
Exhibit A.2.	Randy Hippen	Delete the 5 Int Rmvl Assess rows since these can no longer be entered into CERCLIS.
A.H.	Randy Hippen	Change "Superfund Alternative Agreement" "Regionally Identified Superfund Alternative Agreement" and add "Site With SA Agreement Per OECA Policy" directly below this.
A.J.14.	Randy Hippen	Modify 2nd bullet of HRS completions section to: The following has been recorded in CERCLIS: the approval date for the final version of the HQ QA reviewed (if submitted to HQ) or regional QC reviewed (if not submitted to HQ) HRS Package date or the NPL Proposal publication date as the actual HRS Package completion date (Actual Complete), a lead (Lead), and a decision on whether further activities are necessary in the Qualifier field.
Appendix B		
B.A.1.c.	Randy Hippen	Terminology needs to be updated since we are no longer using the phrase "Superfund Alternative Sites". Suggest revising title to Superfund Alternative Approach (SAA) Settlements and replacing text throughout Appendix B with "sites with SAA settlements". The new terminology needs to be reviewed and approved by OSRE.
Exhibit B.1.	Randy Hippen	Final remedy selected should show up in the programmatic measures table. It is no longer a GPRA measure.
B.B.	Janet Weiner	Change title of B.B.1. to "Remedial Action and Federal Facilities Response Action Target/Measures." Deleted this sentence referring to 5 Yr Review: For Five Year Reviews, program targets are used to identify and track the specific number of sites, not actions. For statutory reasons, these sites must be targeted site specifically and cannot be substituted for other sites. This is probably valuable information, but it belongs in the specific section discussing 5 Yr review, not in the general intro to the chapter. Suggest an appropriate place be found for this language. " Replace first 4 paragraphs with more streamlined language that directly states the purpose of this chapter.
B.B.a.	Randy Hippen	Under Special Planning/Reporting Requirements, change "Regions are not required to" to "Regions should not"
B.B.b.	Randy Hippen	2nd paragraph, 2nd sentence under Definition and 1st sentence under Special Planning/Reporting Requirements, change "Regions are not required to" to "Regions should not".

**FY 10 SPIM
Change Log
October 1, 2009**

SPIM Section	Comment Provided By	Change Description
B.B.c.	Randy Hippen	2nd paragraph, 3rd and 4th sentences under Definition and 1st sentence under Special Planning/Reporting Requirements, change "Regions are not required to" to "Regions should not".
B.B.e.	Randy Hippen	Special Planning and Reporting Requirements: Change 2nd sentence to "Sites with SAA settlements should be identified in CERCLIS using the appropriate special initiative indicator".
B.B.f.	Randy Hippen	Special Planning and Reporting Requirements: Change 4th sentence to "Sites with SAA settlements should be identified in CERCLIS using the appropriate special initiative indicator".
B.B.h.	Randy Hippen	<p>ROD Amendments section: spell out AR as "Administrative Record (AR)" since it is the first time used.</p> <p>ROD section, last sentende in 1st paragraph: Revise to "To receive credit for a completed ROD, the region must enter the action, appropriate lead, and actual completion date. EPA HQ is now responsible for data entry of the following elements: media addressed, media name, selected alternative, response technology, remedy cost data, and institutional control information.</p>
B.B.i.	Randy Hippen	<p>Punctuation/grammar edits to the Definition section: Delete 2nd sentence beginning with "However, ..." It is incomplete and confusing. Revise next to last sentence to: "In general, an Epplanation of Significant Difference (ESD) will not constitute a Final Remedy Selected since ESDs generally document a non-fundamental change to a remedy.</p> <p>Special Planning/Reporting Requirements. Delete 2nd sentence since SNAP process is no longer implemented. Change 3rd sentence from "The system" to "CERCLIS".</p>
B.B.m.	Katherine Garufi	Added language about Monitored Natural Recovery
B.B.p.	Jennifer Hovis	For the FY10 SPIM, please move the language that currently appears under "Changes in Definition..." and make it a 2nd paragraph under "Definition of Accomplishment"
B.B.q.	Katherine Garufi	Added language about Monitored Natural Recovery
B.B.r.	Jennifer Hovis	Redrafted the entire section B.B.r. and have attached it in a Word file. The revisions were necessary in order to include PRP-lead Superfund Alternative sites. The revision also eliminates the first table above, which is inconsistent with other program guidance, which is being revised.
Former B.B.2.z.	Janet Weiner	If this section (Site with Land Ready for Reuse) is blank, perhaps we should delete the title entirely.
Former B.B.2.aa.	Janet Weiner	If this section (Acres at Sites with Land Ready for Reuse) is blank, perhaps we should delete the title entirely.
B.B.z.	Melissa Friedland	Updated language in this section.
B.B.cc.	Janet Weiner	Suggest renaming section from "Site-Wide Human Exposure Environmental Indicator" to "Human Exposure Under Control" and noting in first paragraph of subsequent discussion that this is a GPRA performance measure.
Exhibit B.4.	Randy Hippen	Delete Charles Sands as RODs/Remedy Selection SME from table.

**FY 10 SPIM
Change Log
October 1, 2009**

SPIM Section	Comment Provided By	Change Description
Appendix C		
C.A.a.	Eric French	Relocate C.A.3.r. Past Costs Addressed > \$200,000 Via Settlements, Write-Offs, or Referrals to: C.A. FY08/09 GPRA Targets and Measures for Enforcement as C.A.a.
C.A.b.	Eric French	Relocate C.A.3.ii. Pre-Remedial Enforcement Action at Superfund Sites to: C.A. FY08/09 Targets and Measures for Enforcement as C.A.b.
C.A.1.	Eric French	Change the third bullet to read: Completing Clean-up Negotiations in a Timely Manner: Remedial Design/Remedial Action (RD/RA) negotiations should be completed within 120 days of the issuance of Special Notice Letters (SNLs). SNLs should be issued within 90 days after the signature of the Record of Decision (ROD).
Exhibit C.1.	Eric French	Insert the following activity between the 3rd and fourth activity: Submittal of Pre-Referral Negotiation (PRN) package to DOJ for RD/RA Negotiations
C.A.2.b.	Eric French	Replace the six (6) criteria for a thorough PRP search with the six criteria that is given in the PRP Search Manual. <ol style="list-style-type: none"> 1. PRPs have been afforded opportunities to participate in or contribute to the PRP search, and the information contributed has been verified and/or authenticated and incorporated in the PRP search. 2. All relevant and material leads from CERCLA Section 104(e) responses, interviews, and their primary or source documents have been pursued. 3. Sufficient information and evidence have been obtained to support the government's liability case or to determine that no viable PRPs exist or can be found. 4. PRPs have been categorized and financial and waste contribution information needed to perform orphan share calculations has been collected. 5. Ability to pay determinations (including but not limited to the investigation and analysis of any applicable insurance coverage) have been made for those PRPs who have asserted inability to pay in good faith. 6. General notice letters have been issued to all PRPs being pursued.
C.A.2.d.	Eric French	Add new measure as follows: C.A.2.d. Submittal of Pre-Referral Negotiation (PRN) Package to DOJ for RD/RA Negotiations Definition: A PRN package is a brief summary and analysis of the case and recommends a case management strategy. The PRN package should include a copy of the case Negotiation Plan and a draft CD and should be submitted to DOJ by 30 days after the ROD is signed. Definition of Accomplishment: This action is accomplished on the date the PRN Package (SubAction Name = Pre-Negotiation Package) is submitted to DOJ and entered into CERCLIS as the actual completion date (Actual Complete). Changes in Definition for FY09/10 This is a new program measure. Special Planning/Reporting Requirements: This measure was added in FY10 as part of the implementation of the Interim Policy on Remedial Design/Remedial Action Negotiations. Pre-Referral Negotiation Packages are recorded as a SubAction to negotiation actions. "

**FY 10 SPIM
Change Log
October 1, 2009**

SPIM Section	Comment Provided By	Change Description
C.A.2.l.	Eric French	Under "Definition of Accomplishment" second sentence should read: Credit for the CD (Action Name = Consent Decree) is given on the date in which the CD is entered by the court. Under "Special Planning/Reporting Requirements"sixth sentence should read: Amended Instruments will count for credit in the current year as well as in the program-to-date dollar amount.
C.A.2.m.	Eric French	Under "Special Planning/Reporting Requirements" fifth sentence should read: Amended Instruments will count for credit in the current year as well as in the program-to-date amount.
C.A.2.n.	Eric French	Delete "Additional Reporting Requirements" section.
C.A.2.ii.	Eric French	Somewhere between C.A.2.a and C.A.2.z, insert the following "new" section. Total Amount of Response Commitments through Financial Assurance. (see attachment for criteria) Since C.A.2.r and ii are being relocated to C.A., either spot might be a good place to insert this "new" section.
C.A.3.a.	Eric French	The second sentence under the section entitled "Special Planning/Reporting Requirements" should be moved to the "Site Revitalization" section of Appendix C. Enforcement revitalization data will be pulled from CERCLIS. Credit for enforcement accomplishments for the revitalization measure will be based on the actual completion date of the enforcement instrument (Comfort/Status letter, Windfall Lien Resolution Agreement, Work Agreement with Bonafide Prospective Purchaser, Work Agreement with Bonafide Prospective Lessee, Prospective Purchaser Agreement, and Prospective Lessee Agreement). Only finalized (signed by EPA) enforcement instruments (actual completion date) are counted.
C.A.3.b.	Eric French	Under the heading: "Enforcement will track enforcement documents produced at RAU sites which address potential liability under.... add, Contiguous Property Owner Agreements Contiguous Property Owner Assurance Letters"
Exhibit C.2.	Eric French	Remove Monica Gardner.
Appendix E		
E.A.1.	Ed Ziomkoski	"The first step towards that goal should be reached in early 2008 with the integration of ICTS into SDMS." This sentence has been deleted.
E.A.1.a.	Randy Hippen	Please delete pathway score bullet since we are not currently collecting pathway data in CERCLIS.
E.A.1.e.	Ed Ziomkoski	May want to rephrase bullet 2 with sub bullets. It would read "Document the following information: On-Scene Coordinators (OSCs) assigned to the removal, EPA branch that is addressing the removal,etc.... "
Exhibit E.1.	Trish Gowland	Inserted new diagram for Superfund Data Architecture.
Exhibit E.2.	Randy Hippen	Please add "/Remedy Selection" after Site Assessment for Randy Hippen.

**FY 10 SPIM
Change Log
October 1, 2009**

SPIM Section	Comment Provided By	Change Description
Exhibit E.2.	Janet Weiner	Substitute Amy Vandenburg for Janet Weiner during the period from August 2009 - December 2009.
Appendix G		
Exhibit G.1.	Janet Weiner	Substitute Jennifer Hovis for Richard Jeng on CCs.
Appendix I		
Appendix I	Trish Gowland	New Superfund Records SPIM Appendix for FY 2010.