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SUMMARY OF EPA/STATE OF UTAH/DOE MEETING
ON MRAP ROD
4/11/90

Attendees: T. Plessinger, UNC
P. Mushovic, EPA
S. Peterson, State of Utah
R. McLeod, State of Utah

ROD Schedule

A revised ROD schedule was proposed which would allow DOE, EPA, and State program/project managers' review prior to getting higher level reviews and concurrences. The proposed schedule, shown below, would add a month to issuance of the ROD. This schedule assumes that one of the two options discussed below for supplemental standards use is followed.

Date (1990)	Milestone
April 27 90	Submit draft ROD to EPA, State, DOE-HQ Program
May 11	EPA, State, DOE-HQ Program comments due
May 18	Agree on resolution to Supplemental Standards issue
May 29	Submit copy of ROD to DOE for concurrence and to EPA/State for upper level review/concurrence
June 22	DOE issues ROD to EPA/State
July 13	EPA/State signatures complete
July 31	DOE signature obtained

Supplemental Standard Application

1. EPA concurred with a "contingency ROD" approach that would identify the strategy and criteria for applying supplemental standards. The ROD would state that properties would be remediated and would meet the normally-applied limits established in 40 CFR 192, unless "X, Y, and Z" occur. A decision-tree approach was requested. A brief summary of the approach would be in the body of the ROD, with an appendix providing details. The ROD discussion of peripheral properties would be modified to address Category I properties (conventional construction), Category II properties (environmentally-senstive construction), and Category III properties. Based on the decision tree, Category III properties could be:

   - left as is
   - partially remediated by whatever method to existing limits
   - subject to institutional controls
   - remediated to proposed higher levels than existing criteria
   - remediated using a combination of the above
   - or changed to a Category I or II property.

   The appendix will provide the criteria for making the decisions identified above. Examples of criteria are: wetlands destruction, destruction and/or mitigation of archaeological finds, X level of risk to human health, etc. EPA wants hot spots remediated regardless of the decision. These criteria (FUSRAP?) must be factored in.

   This appendix is to be completed and submitted with the ROD on April 27, 1990.

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2. Late in the day, EPA concluded that if Paul Mushovic feels DOE's current position on supplemental standards (use of supplemental standards constitutes a decision and that individual properties will be evaluated and proposed for supplemental standards during RD), he may try to convince EPA-HQ. If successful, the ROD would be left as is concerning supplemental standards. Paul will pursue this, but the decision tree approach must also be developed in case EPA-HQ does not agree to it.