

CHAPTER 2 - GENERAL SUPERFUND INFORMATION

1. TYPES OF SUPERFUND ACTIVITIES. Superfund cleanup and support activities can be grouped into four broad categories:

a. REMOVALS. Removals are performed when there is
a threat to public health, welfare, or the environment. They may occur either after hazardous substances are released or in efforts to prevent their release. They may involve on-site treatment, storage, destruction, or off-site response. Removals also may include providing security or alternative water supplies at a site or evacuating people from the site.

b. REMEDIAL ACTIVITIES. These activities, which
include such things as remedial investigations/feasibility studies, remedial designs and remedial actions, encompass the long-term cleanup portion of the Superfund program. Remedial actions are taken instead of, or in addition to, removals in the event of a release or threatened release of hazardous materials into the environment. They include such activities as protecting the site with dikes and trenches, neutralizing or destroying the substances, dredging soil, collecting runoff, repairing structures and equipment, and temporarily or permanently relocating residents. Remedial and removal activities may occur simultaneously at any given site.

ENFORCEMENT ACTIVITIES. The purpose of enforcement activities is to involve the Potentially Responsible Party (PRP), that is, the owner, operator, generator or transporter who may have been responsible for creating or contributing to the hazardous waste site, in the cleanup of the site. Enforcement activities involve the identification of PRPs; negotiations and/or litigation to achieve RP response, and oversight of RP cleanup actions. Enforcement activities also may involve management of the cost recovery process, including cost documentation, negotiations and/or litigation to recover Trust Fund monies expended by the Federal Government for response actions where the RPs have not conducted the response action but are responsible for the cost.

c. SUPPORT ACTIVITIES. These activities include support that can be provided at remedial, removal or enforcement sites, including such things as laboratory analysis, aerial photography, preliminary assessments, site inspections, Hazard Ranking System scoring, training, and preparation of specialized equipment. They also include administrative and general program management support provided to Headquarters and Regional Offices.

2. PARTNERS IN THE CLEANUP PROCESS. EPA works with and funds a variety of organizations to carry out the four categories of activities outlined above.

a. OTHER FEDERAL AGENCIES. EPA may enter into Interagency Agreements (IAGs) with other Federal agencies to conduct cleanup and support activities (see Chapter 6).

b. LOCAL GOVERNMENTS. EPA may provide limited reimbursement to local governments for costs incurred for emergency work performed at hazardous waste sites (see Chapter 8). EPA may also enter into Cooperative Agreements with local governments to perform remedial activities.

c. STATES. The Agency may negotiate a Cooperative Agreement or Superfund State Contract with states. For EPA-lead sites, EPA will manage the response, and the state will share in the cost of certain phases of the cleanup. For state-lead sites, the state will manage the response, generally using contractor support (see Chapter 9).

d. CONTRACTORS. The Superfund program makes extensive use of private firms to conduct remedial, removal, enforcement, and general support activities on a contractual basis (see Chapter 10).

e. PRIVATE PARTIES. Private parties who are deemed responsible for creating or contributing to hazardous waste sites share in the cost of the response action, through their own cleanup efforts or through cost recovery negotiation/litigation. In some cases, EPA will reimburse a private party for expenses incurred in the cleanup process through a response claim process (see Chapters 11 and 12).

3. FINANCIAL ROLES AND RESPONSIBILITIES. Due to the complexity of the Superfund program, there are numerous organizational units within the Agency which have some responsibility for Superfund financial management. The general roles and responsibilities are noted below; more specific responsibilities are described in each chapter, where appropriate.

a. REGIONAL ADMINISTRATORS (RAs). RAs have the authority to:

- (1) Approve removal actions up to \$2,000,000*

- (2) Award Cooperative Agreements**
- (3) Award Interagency Agreements**
- (4) Enter into Superfund State Contracts**
- (5) Initiate remedial planning activities**
- (6) Grant states credits against their cost share (proposed)**
- (7) Award Technical Assistance Grants (proposed).

* May be redelegated, except for removals deemed to be "nationally significant"

** May be redelegated.

b. REGIONAL PROGRAM OFFICES. Overall Regional Program Office financial responsibilities include managing contracts, Cooperative Agreements and Interagency Agreements; preparing commitment notices and procurement requests; developing Superfund State Contracts and Cooperative Agreements with the states, and either issuing site/spill identifiers or requesting that they be issued by the Regional Management Division. Within the Regional Program Offices, the following staff have specific Superfund financial management responsibilities:

(1) ON-SCENE COORDINATOR (OSC). The Regional OSC may be an employee of EPA or the U.S. Coast Guard. This person reacts to hazardous substances spills and releases or threats of release by initiating and managing the removals process. The OSC's financial management responsibilities include preparing site budgets and completing Action Memoranda; preparing delivery orders and procurement requests for contracts, establishing and maintaining official site files; reviewing and approving the removal cleanup contractors' charges on a daily basis; and approving removal contractors' invoices. The OSC must be aware of, in control of and responsible for all removal site charges and for ensuring that costs are reasonable and necessary.

(2) ORDERING OFFICER. All Ordering Officers must have a written "Delegation of Procurement Authority" signed by a Senior Procurement Manager prior to performing their duties. The

Ordering Officer may initially obligate up to a maximum of \$250,000 for removals at a specific site by issuing a Delivery Order under an existing contract. (Note: Regions have not granted authority above \$50,000 despite contractual authority up

to \$250,000.) This person also develops the statement of work and cost ceiling for removals. While Ordering Officers may be any designated Federal officials, they are frequently OSCs. If not an OSC, the Ordering Officer should coordinate the delivery order work with the OSC.

(3) REGIONAL PROJECT OFFICER (RPO) AND REMEDIAL PROJECT MANAGER (RPM). In general, the RPO is responsible for overall remedial contract management functions. The RPO initiates the contracting, Cooperative Agreement and IAG process for remedial activities; evaluates and designates contractor award fees; monitors contractors' activities and reviews monthly contractor reports; and approves IAG invoices. The RPM, in coordination with the regional state program and enforcement personnel, is responsible for managing remedial costs and activities on a site-specific basis and for establishing and maintaining the official remedial site files.

c. REGIONAL MANAGEMENT DIVISION. The financial management functions are organized somewhat differently within each Regional Office. For purposes of this document, the generic term "Regional Management Division" will be used as the name of the organization in which all financial management, budgetary, accounting, planning, and assistance agreements administration functions are carried out. The Regional Financial Management Office (FMO) is considered to be a part of this division. In most Regions, the Regional Management Division:

- (1) Assigns account numbers and Document Control Numbers (DCNs) to all commitment and regional obligation documents
- (2) Controls the regional allowance, maintains the Document Control Register, reconciles transactions
- (3) Issues site/spill identifiers for non-Coast Guard-lead sites
- (4) Processes all procurement requests (PRs) for national contracts; enters commitments into FMS
- (5) Processes commitment notices (CNs) for Interagency Agreements; enters commitments into FMS; processes IAGs; requests IAG identification number from Grants Administration Division/Headquarters; and provides administrative oversight of IAGs
- (6) Develops regional Superfund budget in coordination with the Headquarters and Regional Program Offices

(7) Processes Cooperative Agreements (CAs); assigns CA identification number; enters CA commitments,

obligations and drawdowns into FMS; provides fiscal and administrative oversight of CAs

(8) Sets up regional account numbers in FMS (new obligational authority only) at the request of the Regional Program Office

(9) Documents Regional Office costs and applies the indirect cost rates to the regional site-specific payroll hours
for the Superfund cost recovery process

(10) Bills for and collects state cost shares, fines and penalties and cost recoveries.

d. SERVICING FINANCE OFFICE/RESEARCH TRIANGLE PARK (RTP). This office is responsible for providing accounting support for all Superfund contracts. The office enters contract award data and obligations into FMS, processes contractor invoices, and enters payments into FMS.

e. SERVICING FINANCE OFFICE/CINCINNATI. This office is responsible for providing accounting support for all Superfund IAGs. The office processes disbursement requests from other agencies, processes the billings for reimbursable activities and enters IAG obligations and disbursements into FMS.

f. FINANCIAL MANAGEMENT DIVISION/OFFICE OF THE COMPTROLLER. This office monitors the financial aspects of the Superfund program through four of its branches.

(1) SUPERFUND ACCOUNTING BRANCH (SAB). The SAB is the focal point for all Superfund financial management activities. It designs and implements systems as required to support the Superfund program in coordination with the Financial Systems Branch; serves as the central office for collection of Headquarters' Superfund cost documentation for cost recovery actions; calculates the Superfund indirect cost rates for cost recovery purposes and manages the ongoing and annual site-specific reporting processes.

(2) FISCAL POLICIES AND PROCEDURES BRANCH.
This branch documents and issues financial policies and procedures for the financial management of the Superfund program and advises EPA officials on financial management matters related to the Hazardous Substance Superfund.

(3) HEADQUARTERS ACCOUNTING OPERATIONS BRANCH.
This branch reports monthly to the U.S. Treasury by

account, and provides general accounting support to Superfund and other EPA programs at Headquarters.

(4) FINANCIAL REPORTS AND ANALYSIS BRANCH (FRAB). The FRAB is responsible for directing all monthly drawdowns of funds required to cover Superfund disbursements by EPA and other Federal agencies. This Branch notifies the Trust Fund daily to invest cost recoveries, fines and penalties received in the Superfund "lockbox". It establishes Superfund site-specific account numbers for all new sites established by the Regions for Headquarters Allowance Holders.

g. FUNDS CONTROL CENTER/OFFICE OF EMERGENCY AND REMEDIAL RESPONSE (FCC/OERR). The FCC provides financial management and accounting support services to the Superfund program office. Responsibilities include:

(1) Maintains the OERR Document Control Register, controls the allowance, processes change requests and reconciles transactions for OERR

(2) Processes and commits funds and assigns account numbers and DCNs for Headquarters OERR contracts

(3) Assigns accounting data to monthly site-specific invoices and annual site-specific reports for OERR contracts

(4) Maintains the central site/spill identification system; assigns S/S IDs to Coast Guard-lead removal sites

(5) Processes and monitors Headquarters OERR IAGs

(6) Prepares Superfund internal financial reports for the program office and implements Superfund-specific guidance and directives

(7) Implements and oversees OERR compliance with Agency financial management policies and procedures

(8) Provides liaison with Regional Offices regarding OERR financial issues

(9) Provides financial policies to Regional Superfund Program Offices.

h. PROCUREMENT AND CONTRACTS MANAGEMENT DIVISION/OFFICE OF ADMINISTRATION (P&CMD). P&CMD conducts the Superfund

contracting program. This involves negotiating, awarding, monitoring, modifying, and terminating contracts and providing technical guidance on contract administration. P&CMD also provides cost and price analysis for Superfund contracts, among others. Plans are underway for decentralizing the contracting function to the Regions.

i. GRANTS ADMINISTRATION DIVISION/OFFICE OF ADMINISTRATION (GAD). This division issues policy, regulations and guidance for the processing, award, and administrative management of financial assistance agreements and Interagency Agreements; issues identification numbers for all Interagency Agreements; and processes and awards Headquarters IAGs.

j. ALLOWANCE HOLDERS. The Budget Division within EPA's Office of the Comptroller allocates Superfund allowances among management officials in Headquarters and the regions. These Allowance Holders are responsible for certifying the availability of funds, for seeing that the commitments and expenditures they make do not exceed their allowances, and for ensuring that their offices comply with established procedures for controlling funds.

(See Division 2520 of this directives system--Administrative Control of Appropriated Funds--for general funds control guidance.)

k. BUDGET DIVISION/OFFICE OF THE COMPTROLLER. This Division allocates the Superfund allowances among the Headquarters and Regional Offices; monitors obligations against regular and site allowances on a monthly basis; processes change requests, and reprograms allowances, as necessary.

4. TREASURY APPROPRIATION SYMBOL. The U. S. Department of Treasury has assigned the symbol 68-20X8145 to the EPA Superfund appropriation. This number is entered on all Superfund Procurement Requests and certain other financial documents.

5. INTRAMURAL AND EXTRAMURAL FUNDS.

a. INTRAMURAL FUNDS. These funds are used to support staff and activities internal to EPA. In the President's Budget, the amount of intramural funds requested is based on how many full-time equivalents are needed for internal EPA activities. In EPA's Operating Plan, intramural funds are expressed in dollars and are budgeted for all object classes internal to EPA, such as personnel, travel, and equipment.

b. EXTRAMURAL FUNDS. These funds are budgeted for personnel and activities external to EPA. In the President's Budget, extramural funds are budgeted for activities to be performed by contractors or other government agencies. In EPA's Operating Plan, extramural funds are budgeted for the following object classes: Interagency Agreements, program contracts, Research and Development contracts and grants, grants to state and local governments and Technical Assistance Grants.

6. SUPERFUND ACCOUNT NUMBERS. To manage the Superfund program effectively, and to recover cleanup costs, EPA must carefully document and record its direct and indirect costs for each cleanup action and track the costs through its Financial Management System (FMS). To this end, EPA has defined specific uses of the last four positions of the Agency's standard ten-digit Headquarters account number for the Superfund program.

Figure 2-1 on the following page presents both a hypothetical site-specific Superfund Headquarters account number and Regional Office account number.

a. APPROPRIATION YEAR. The first field of the account number is the last number of the year for which the funds were appropriated. For example, obligations of FY 1987 appropriations would be represented by the number 7. Money appropriated for a given year which is available for obligation in a subsequent year (carryover money) is designated by letters specified by the EPA Budget Division.

b. PROGRAM ELEMENT. The second, third, and fourth fields consist of three letters representing the first three positions of the six-position Superfund program elements. In the examples in Figure 2-1, TFA represents the Hazardous Spill and Site Response element. For a list of the Superfund program elements, see Exhibit 2550D-2-1 at the end of this chapter and Appendix 2550D-1.

c. ALLOWANCE HOLDER. The fifth and sixth fields of the account number represent the Allowance Holder. For example, 72 is the number for the Office of Emergency and Remedial Response at Headquarters. Regional Allowance Holders are designated by the number of their region, e.g., in the hypothetical regional account number, 07 stands for Region 7. Exhibit 2550D-2-2, at the end of this chapter, contains a list of all Allowance Holders who may have Superfund monies as part of their allowance. Appendix

2550D-1 presents the Superfund Allowance Holders and associated program elements by fiscal year.

d. REGIONAL IDENTIFIER/RESPONSIBILITY CENTER. For most Headquarters Allowance Holders, the seventh field of the account number is generally reserved for identifying the region where Superfund site-specific cleanup is taking place. Thus, work in Region 2 is identified by the number 2. Headquarters Allowance Holders may also use this position to identify a Headquarters responsibility center when the account number is not for site-specific costs. Regional Allowance Holders use this position to identify specific responsibility centers, since the region in which the site is located can be determined by the allowance holder number. Thus the letter "M" in the regional example identifies Environmental Services as the responsibility center in Region 7.

The Office of Research and Development (ORD) is exempt from the requirement that Headquarters offices use this position to identify regional activity. However, ORD must keep detailed manual records documenting site-specific costs and indicating in which region the activity occurred.

Allowance Holders have traditionally used this position to designate responsibility centers, or suballowance holders, within their overall areas of responsibility. ORD, Headquarters offices charging non-site-specific costs, and the regions may continue to use this position for that function.

e. ACTIVITY CODES. The eighth field contains a number or letter representing different remedial, removal, and enforcement activities. For example, 8 is the activity code for Removal Support and Management. Certain activity codes may be used only in conjunction with site-specific account numbers, others only with non-site-specific account numbers, and some with a combination of the two. Activity codes are revised as necessary.

For a list and description of the current activity codes, see Exhibit 2550D-2-3 at the end of this chapter and Appendix 2550D-2. Exhibit 2550D-2-4 lists the EPA Superfund activity codes by fiscal year.

f. SITE/SPILL IDENTIFIER. The ninth and tenth fields are used for identifying the site associated with the particular financial transaction. Generally, the Regional Management Division assigns these codes on request of the Superfund program office. However, for work done by the U.S. Coast Guard, the FCC assigns them. In assigning individual codes, the Regional Office uses the following coding system:

The first site code assigned is 01; the twentieth, 20; and so on, until 99. The next ten sites will be identified as A0 through A9; the following ten, B0 through B9; and so on. After site Z9, the sequence will change to 0A-0Z, 1A-1Z, and so on. Then it will change to double letters, from AA through AZ, continuing with BA to BZ, and so on, until ZY, the final site identifier. The letters I and O are not used, since they may be confused with numbers. In addition, U and V in the ninth field are reserved for Coast Guard actions.

The code ZZ is used in the ninth and tenth fields to identify work done on sites for which no code has been assigned, and 00 is used to identify work that is not site-specific.

7. SITE/SPILL IDENTIFIERS (S/S IDs). As noted in paragraph 6 above, S/S IDs are generally issued by either the Regional Management Division, the Regional Program Office or the FCC. The following guidelines should be used when assigning S/S IDs:

a. WHEN TO ISSUE AN S/S ID. Because of the limited number of site codes available (slightly more than 1,000) for each Region, it is important to refrain from issuing site/spill identifiers until they are actually needed to establish account numbers for the commitment and obligation of funds. The following is general guidance to be used when there is a question about whether or not to establish a new site/spill identifier. Since unique situations may arise for which existing guidance may not be applicable, the FCC/OERR in Headquarters should be contacted at FTS 475-8101 whenever questions arise.

(1) REMOVAL SITES. Removal sites should receive an identifier when the Regional Administrator, or an employee with delegated authority, has approved the site and funds are ready to be obligated to a cleanup contractor. Personnel costs for preliminary inspections and sampling, or for the monitoring of a responsible party cleanup effort, can be charged to the "ZZ" identifier instead of issuing an S/S ID, when it appears unlikely that there will be extramural costs incurred at the site. An identifier should be established, however, when costs for developing or ongoing enforcement activity are expected to exceed 24 staff hours per pay period, since a cost recovery case is likely. Each region also has a "TBA EMERGENCY" identifier to be used by the OSC in the event of an emergency at a new site occurring during non-office hours. At the earliest possible opportunity, the site information should be provided for the old "TBA" and a new "TBA" established and given to the OSCs. S/S IDs should not be assigned to removal sites which are on the National

Priorities List (NPL) for which S/S IDs have already been assigned; however, the removal program designation may be added to these sites.

(2) REMEDIAL SITES. Remedial sites should receive S/S IDs when an account number is needed for the obligation of funds for a remedial investigation/feasibility study (RI/FS); they may also be issued for the purpose of obligating site-specific dollars for Forward Planning through a State Cooperative Agreement. Generally, RI/FSs may be performed at proposed NPL sites; Remedial Actions can be performed ONLY at final NPL sites. Forward Planning can occur prior to the NPL designation. While site identifiers can be established for Federal facilities, the Superfund can be used only to investigate and sample at such a site, not to clean up. Dioxin sites do not have to be on the NPL in order to establish an ID.

(3) ENFORCEMENT SITES. In general, at least one of the following conditions must apply before an S/S ID is assigned to an enforcement site:

- o More than two days of work is being done on the site
- o Monitoring is already taking place
- o A scope of work is being written
- o There is a draft of an administrative order
- o Contractor support is being provided.

S/S IDs should not be assigned to enforcement sites which are on the NPL for which S/S IDs have already been assigned; however, the enforcement program designation may be added to these sites.

b. PROGRAM DESIGNATION. Each S/S ID should be designated as to the type(s) of activity for which the site has been approved, i.e., remedial, removal, or enforcement. This designation determines which activity codes can then be used when establishing account numbers in FMS. All removal and remedial sites are automatically approved for enforcement activities; however, a site should be designated as both removal and remedial only if both types of activity are actually approved and being undertaken or have been completed at the site.

c. ALIASES AND "SUB-SITES." Before establishing a new S/S ID, a thorough check should be made to ensure that the site is not already listed under another name. The enforcement program staff will often refer to a site by the name of the responsible party, while the removal or remedial program staff will name the site based on its geographical location. Sometimes there may be several sites linked together, and it will be questionable whether to identify each sub-site individually or

to issue only one ID for the group. The NPL should be used to determine the site name, where possible. The city and state should be included in the site name to make the search for aliases easier.

d. MAINTENANCE OF THE S/S ID SYSTEM. The master S/S ID list is maintained by the FCC/OERR. The list is distributed in hard copy. Any questions regarding the S/S IDs or requests for the S/S ID list should be directed to the FCC/OERR at FTS 475-8101.

PROGRAM ELEMENT TITLES AND CODES	
Program Element Code	Program Element Title
TEDY1A	Scientific Assessment--Superfund
TEDY1A	Monitoring Systems and Quality Assurance--Superfund
TEJY1A	Environmental Engineering and Technology--Superfund
TEKY1A	Environmental Processes and Effects--Superfund
TENY5A	Hazardous Substance--Financial Management: Regions
TGZY5A	Hazardous Substance--Financial Management: Headquarters
TETY5A	Hazardous Substance--Administrative Management: Regions
TEPY5A	Hazardous Substance--Administrative Management: Headquarters
TEUY5A	Hazardous Substance--Support Services: Regions
TERY5A	Hazardous Substance--Support Services: Headquarters
TEYY5A	Hazardous Substance--Legal Services: Regions
TEWY5A	Hazardous Substance--Legal Services: Headquarters
TFAY9A	Hazardous Spill and Site Response
TFCY5A	Hazardous Substance--Computer Service
TFZY3A	Hazardous Substance--Technical Support: Office of Enforcement and Compliance

TGBY3A Hazardous Substance--Technical Enforcement

TJBY3A Hazardous Substance--Legal Enforcement

TEVY5A Hazardous Substance: Office of the Inspector
General

TGVY5A Hazardous Substance: Office of Policy, Planning and
Evaluation

TKUY5A Hazardous Substance: Office of the Comptroller

TLXY5A Hazardous Substance: Office of Research and
Development - Lab Support

TJGY9C Interagency Superfund: Department of Health and
Human Services

TJHY9C Interagency Superfund: United States Coast Guard

TJJY9C Interagency Superfund: Department of Justice

TJKY9C Interagency Superfund: Federal Emergency
Management Agency

TJMY9C Interagency Superfund: National Oceanographic and
Atmospheric Administration

TKLY9C Interagency Superfund: Department of the Interior

TLMY9C Interagency Superfund: Occupational Safety and
Health Administration

EXHIBIT 2550D-2-1

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Superfund Allowance Holders

01 RA REGION 1 BOSTON

1A RA REGION 1 BOSTON (SF)

02 RA REGION 2 NEW YORK

2A RA REGION 2 NEW YORK (SF)

03 RA REGION 3 PHILADELPHIA

3A RA REGION 3 PHILADELPHIA (SF)

04 RA REGION 4 ATLANTA

4A RA REGION 4 ATLANTA (SF)

05 RA REGION 5 CHICAGO

5A RA REGION 5 CHICAGO (SF)

06 RA REGION 6 DALLAS

6A RA REGION 6 DALLAS (SF)

CODE	DESCRIPTION	81	82	83	84	85	86	87*
A	General Superfund Support and Management	X			X	X	X	
B	Discovery, Notification and Screening							X
	X B Pre-enforcement Activity							X
	X							
C1	Removal Preliminary Assessment		X		X	X	X	
C2	Removal Discovery, Notification, & Pre-							

	Preliminary Assessment							X	X	
D	Removal Post - Preliminary Assessment X									
E	Removal Actions	X	X	X	X	X	X	X		
F1	Monitoring Responsible Party Removal/Remedial Actions		X	X	X					
F2	Monitoring Responsible Party Removal/Remedial Actions and Site Specific Enforcement RI/FS work						X			
F3	Monitoring Responsible Party Removal Actions								X	X
G	Evacuation and Emergency Assistance	X		X	X	X				
H	Remedial Post-Ranking Activity	X			X	X	X	X	X	
J1	Remedial Preliminary Investigation and Assessment	X		X	X	X				X
J2	Remedial Discovery, Notification, Preliminary Assessment, Site Inspection, and Ranking Activities								X	X
K1	Field Investigation Team Activities		X	X	X					
K2	Field Investigation Team/Remedial Action Master Plan Development							X		
K3	Remedial Technical Support, Oversight, and Community Relations Planning						X	X		
L1	Remedial Investigation	X		X	X	X				
L2	Remedial Investigation/ Feasibility Study								X	X X M
	Feasibility Study	X	X	X						
N	Remedial Design	X			X	X	X	X	X	X
P	Oversight of Responsible Party									X Q
	Planned Removal Actions	X	X	X	X	X				
R	Remedial Action	X	X	X	X	X	X	X		
S	Operation and Maintenance Monitoring	X		X	X				X	X X
T	Enforcement Actions	X	X	X	X					
U	Laboratory Analysis Support								X	X X
V	Remedial Action Master Plan Development		X	X	X					

W	Initial Remedial Measure	X	X	X			X	W
	Expedited Response Action							X
X	Monitoring Responsible							
	Party Remedial Actions				X	X		
Y	Removal TAT Activities					X	X	X
	Technical Assistance							Z
	Grants							X
								2
	Judicial Enforcement					X		
3	State Liaison				X			
4	General Superfund							
	Enforcement					X	X	X
								5
	Removal Enforcement				X	X	X	
6	Remedial Enforcement					X	X	X
7	General Superfund Support and Management							
	X X X							
8	Removal Support and							
	Management					X	X	X
9	Remedial Support and							
	Management					X	X	X
0	R&D (non-site specific) numeric					X		X
	X X X X X							