

RCRA Corrective Action
Statement of Intent
between
United States Environmental Protection Agency
Region III
and
DuPont

In an effort to enhance program flexibility, spur cleanup progress, and promote effective and efficient management of RCRA Corrective Action Facilities, the United States Environmental Protection Agency (EPA) has set ambitious Environmental Indicator (EI) goals for companies on the RCRA Cleanup Baseline. By 2005, the Agency intends that 95% of high priority facilities meet the “current human exposures controlled” indicator and 70% meet the “migration of contaminated groundwater controlled” indicator. These EI goals are interim steps, representing site stabilization, ultimately leading to final cleanups.

EPA and DuPont recognize that there are positive benefits in a results oriented focus for the Corrective Action Program and in meeting the Agency’s corrective action EI goals. Conducting EI assessments will help in setting priorities for further investigation or interim measures. Addressing EIs ensures protection for human health and the environment and is a relatively straightforward way to document and show the public and stakeholders that site conditions are stable and under control. When a facility meets both EIs, EPA and DuPont have an opportunity to demonstrate positive environmental conditions at the site.

EPA Region III and DuPont have entered into this agreement to facilitate effective management of the Corrective Action program. By signing this agreement, although not legally binding, EPA and DuPont agree that it is important to:

- Ensure the protection of human health and the environment by prioritizing and focusing our actions and resources on the control of adverse human exposures and migration of contaminated groundwater.
- Work together to strive to meet Corrective Action EI goals for DuPont facilities in Region III by 2005.
- Investigate releases of hazardous wastes or hazardous waste constituents using quality data collection and laboratory analysis methods.
- Use risk management decision making as the primary driver for all data collection. Data collection and reporting will be streamlined and focus on those factors that present or have the potential to present adverse risk.
- Perform interim measures to prevent or mitigate unacceptable impacts to human health and the environment by controlling human exposure and migration of groundwater contamination.
- Continue to use a stepwise, risk based and results focused approach to additional actions after EIs are met.
- Establish flexible, efficient, iterative and dynamic systems, processes and schedules.
- Communicate regularly to the community on corrective action progress.

- Undertake all actions consistent with applicable federal, state and local regulations.

By using this results oriented, performance based approach of prioritized objectives, EPA and DuPont will strive to increase flexibility while reducing administrative burdens to achieve corrective action program goals.

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Date: 10/16/2000

_/s/ Isidoros J. Zankos
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Date: 10/06/2000