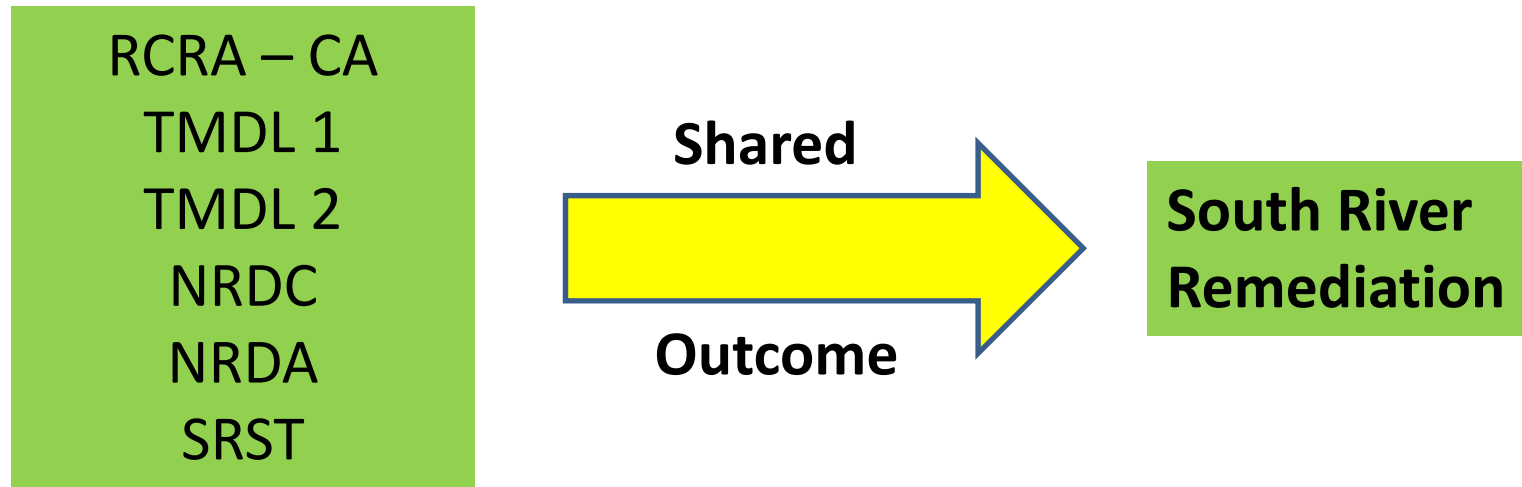


Program Integration Task Team

Update 2-11-13

Many Program Drivers



**Is there a single regulatory program
that can be administered to satisfy all drivers?**

“Administrative” Options

- **Existing RCRA Corrective Action Permit (3008h)**
- **RCRA CA Permit for the off-site mercury component**
- **Consent Order with VA**
- **7003 Order with EPA (Imminent and substantial endangerment)**
- **Superfund Alternative Approach**

Preferred Administrative Options

- **Existing RCRA Corrective Action Permit (3008h)**
 - Currently addresses on-site only
 - VA authority, currently administered by EPA
 - VA administration for remedial action phase
 - Amend permit to add separate off-site component
 - Transfer on-site component to Invista upon remediation completion
- **Superfund Alternative Approach**
 - Same processes and standards as sites listed on National Priority List
 - Site must be eligible for listing, but is not actually listed
 - Administered by EPA through AOC's and CD's
 - Not a widely used program, 49 agreements as of Jan 2012
 - Some agreements have similarities with the South River situation