



# Removal Response Reporting: OSC Reports

Office of Emergency and Remedial Response  
Emergency Response Division (5202G)

Quick Reference Fact Sheet

This fact sheet on the preparation and distribution of OSC Reports summarizes a part of the Superfund Removal Procedures (SRP) volume entitled "Removal Response Reporting: POLREPs and OSC Reports" (OSWER Directive 9360.3-03). The SRP volume, one of a 10-part series of documents replacing the SRP manual (OSWER Directive 9360.0-03B, February 1988) describes how to prepare and distribute Pollution Reports (POLREPs) and On-Scene Coordinator (OSC) Reports. OSC Reports summarize activities at a site on completion of a removal action. Further information concerning the SRP series can be found in the SRP Manual Bulletin (Publication 9360.3-11I). For information on POLREPs, refer to the fact sheet Removal Response Reporting: POLREPs (Publication 9360.3-15FS).

## INTRODUCTION

As currently written, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) requires the lead agency at a site to prepare and submit to the Regional Response Team (RRT) a complete report on the removal operation and the actions taken. OSC Reports must meet Superfund program policy requirements and the regulatory requirements under Section 300.165 of the NCP, where applicable. Table 1 contains the outline to be followed in writing OSC Reports.

OSC Reports document removal activities under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986; oil spill responses under the Oil Pollution Act (OPA) of 1990; and, in some instances, underground storage tank removals under the Resource Conservation and Recovery Act (RCRA).

## WHAT ARE OSC REPORTS?

OSC Reports are concise and comprehensive documents that summarize the removal activities at a site, the effectiveness of those activities, and the resources committed. OSC Reports present discussions of removal site problems, views on

improvements, and cautions which need to be shared with the National Response Team (NRT), RRT, and other OSCs. OSC Reports are the primary vehicle for conveying important information on technologies used and lessons learned at a site to other OSCs and to Superfund managers.

## WHO PREPARES OSC REPORTS?

The OSC of the lead agency at a removal site is responsible for preparing and distributing the OSC Report. While the NCP does not specifically require an OSC Report for a PRP-lead site, it is common to do so in many Regions. The title of the report may differ across the Regions, but its general format and content are similar to those of an OSC Report.

## USERS AND USES OF OSC REPORTS

The value and usefulness of OSC Reports are directly related to their completeness, quality, and timely distribution. The NRT and RRTs use OSC Reports for transferring information on technologies used and lessons learned at sites throughout the national response system, and for developing training programs for OSCs. Regional Counsel, Department of Justice attorneys, and Regional cost recovery staff use OSC Reports as

a convenient summary of the history of a removal activity when prosecuting a cost recovery case. Superfund program managers, focusing primarily on difficulties encountered at sites and on the recommendations of OSCs, use OSC Reports to evaluate program policies and regulations and to make appropriate adjustments.

## **DISTRIBUTION OF OSC REPORTS**

The NCP now requires that an OSC Report be submitted to the RRT, the Secretary of the NRT, and the Director of the Emergency Response Division (ERD) within one year of the completion of the removal activity, or when requested by the RRT. EPA expects that OSC Reports will be written as soon as practicable. For removals of short duration, OSC Reports should be submitted within six months of the completion of the removal activity.

The OSC should give the Office of Regional Counsel an opportunity to review the OSC Report before it is finalized and distributed. This is especially crucial if the details of the Report relate to pending or anticipated civil or criminal litigation, or possible responsibility of the United States or an agency of the United States for a release or discharge.

## **INFORMATION REQUIREMENTS**

The OSC Report should contain only information listed in the format provided by NCP §300.165. References should be made to supplemental documents which may be placed in an addendum to the Report. Regional practices on this vary.

OSC Reports should contain only factual information concerning the site. Subjective judgments and conclusions which are not fact-based should be avoided. Presenting the information as objective statements of fact will minimize any possible adverse effects on cost recovery efforts, and will still indicate to Superfund managers issues that require investigation, evaluation, or communication to others.

Detailed information regarding day-to-day events at a site should not be included in the OSC Report. However, it should include the level of detail needed to ensure that readers will understand and profit from it. In meeting all reporting requirements for OSC Reports, particular attention should be paid to the Difficulties Encountered and Recommendations sections.

## **OSC REPORT FORMAT**

OSC Reports follow the format described in the NCP. If a section is not relevant to the removal conducted, that fact should be indicated. Call Gil Laskowski of ERD-RSCB at (703) 603-8719 for information about a WordPerfect macro package for preparing OSC Reports. The OSC Report outline is provided in Table 1 on page 3.

## **FURTHER INFORMATION**

For a copy of "Removal Response Reporting: POLREPs and OSC Reports" or any other volume of the SRP manual, contact:

National Technical Information Service  
5285 Port Royal Road  
Springfield, VA 22161  
Phone: (703) 487-4650

EPA employees can order a copy by calling the Superfund Document Center at (703) 603-8917.

Notice: The policies set out in this fact sheet are not final Agency action, but are intended solely as guidance. They are not intended, nor can they be relied upon, to create any rights enforceable by any party in litigation with the United States. EPA officials may decide to follow the guidance provided in this fact sheet, or to act at variance with the guidance, based on an analysis of site-specific circumstances. The Agency also reserves the right to change this guidance at any time without public notice.

**Table 1: OSC Report Outline**

**Title Page** (suggested)

**Executive Summary** (suggested)

**I Summary of Events** (including project dates and authority to conduct response)

- A. Site Conditions and Background
  - 1. Initial situation, including site location, coordinates, and NPL status
  - 2. Location of hazardous substance(s)
  - 3. Cause of release or discharge
  - 4. Efforts to obtain response by responsible parties
- B. Organization of the Response, Including State/Local Participation
- C. Injury/Possible Injury to Natural Resources
  - 1. Content and time of notice to natural resource trustees
  - 2. Trustee damage assessment and restoration activities
- D. Chronological Narrative of Response Actions
  - 1. Threat abatement actions taken
  - 2. Treatment/disposal/alternative technology approaches pursued
  - 3. Public information and community relations activities
- E. Resources Committed

**II. Effectiveness of Removal Actions**

- A. Actions Taken by PRPs
- B. Actions Taken by State and Local Forces
- C. Actions Taken by Federal Agencies and Special Teams
- D. Actions Taken by Contractors, Private Groups, and Volunteers

**III. Difficulties Encountered**

- A. Items that Affected the Response
- B. Issues of Intergovernmental Coordination
- C. Difficulties Interpreting, Complying with, or Implementing Policies and Regulations

**IV. Recommendations**

- A. Means to Prevent a Recurrence of the Discharge or Release
- B. Means to Improve Response Actions
- C. Proposals for Changes in Regulations and Response Plans

