



# Removal Response Reporting: POLREPS

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

Quick Reference Fact Sheet

This fact sheet on the preparation and distribution of Pollution Reports (POLREPs) 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 POLREPs and On-Scene Coordinator (OSC) Reports. POLREPs provide factual progressive data on removal activities. Further information concerning the SRP series can be found in the SRP Manual Bulletin (Publication 9360.3-11I). For information on OSC Reports, refer to the fact sheet Removal Response Reporting: OSC Reports (Publication 9360.3-14FS).

## INTRODUCTION

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) requires the lead agency at a site to complete and maintain documentation to support all actions taken under the NCP and to form the basis for cost recovery during all phases of response (NCP §300.160). POLREPs 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 POLREPS?

POLREPs are prepared at the initiation and completion of a removal activity, and at regular intervals in between. POLREPs provide factual, operational, and progressive data on an incident or on site activities, and a current accounting of the total funds allocated for removal activities. POLREPs detail the search for potentially responsible parties (PRPs), other enforcement activities, and measures taken to inform the community of the removal activities. They inform On-Scene Coordinators (OSCs) at other sites about

the outcome of innovative approaches to containment, site cleanup, and waste treatment or disposal.

## TYPES OF POLREPS

There are four types of POLREPS: initial, progress, special, and final.

Initial POLREPs: These are the most detailed; often the readers of subsequent POLREPs are referred to the initial POLREP for background and site information. An initial POLREP should be prepared for each new removal action and should include the street address and coordinates (latitude/longitude), a description of the incident, results of the preliminary assessment (PA) or site inspection (SI), verification that the State was consulted and any results of that notification, the status of removal or remedial or enforcement activities (if relevant), the next steps to be taken, and any key issues or problem areas.

Depending on the circumstances of the response, an initial POLREP may be written before the Action Memorandum for the site is written and approved. If the Action Memorandum has been written, the initial POLREP should specify its status, when it was approved, and the project ceiling and expenditures.

**Progress POLREPs:** These indicate any change since the previous POLREP. They describe the status of ongoing removal activities; explain the actions taken since the last POLREP; describe the next steps to be taken; briefly discuss key issues and problem areas; and detail current cost information (project ceiling and expenditures). Progress POLREPs should include other pertinent (but non-sensitive) information, such as the status of efforts to locate and obtain cleanup by PRPs and community relations concerns.

**Special POLREPs:** These are written when the situation at the site justifies particular attention. Situations requiring special POLREPs include fires, explosions, floods, heightened community or media attention, and accidents, even if no damage or injury is sustained. Special POLREPs should describe the incident or change in circumstances which warranted special attention; outline the actions taken in response to the incident; specify any change in scope of work the incident caused; list any key issues associated with the incident (such as media attention or demobilization of the contractor); and provide current cost information (including expenditures associated with the incident).

**Final POLREPs:** A final POLREP is prepared and submitted when a removal has been completed; in other words, when all objectives outlined in the Action Memorandum and any addenda, including removal and transport of wastes off site, waste disposal, and demobilization have been accomplished. The final POLREP must be precise and detailed, and should be submitted on the action completion date. It should describe the current situation; explain the action taken since the last POLREP; outline the next action(s), if any, to be conducted after the completion of the present response (e.g., remedial activity or post-removal site control); present the results achieved by the removal activity; and detail final costs associated with the removal activity.

## **WHO PREPARES POLREPS?**

The lead agency at a site is responsible for the timely preparation and distribution of POLREPs. The OSC prepares and submits POLREPs during

Fund-lead removals. Although the NCP does not require POLREPs for PRP-lead sites, OSCs are encouraged to prepare POLREPs when overseeing or monitoring PRP-lead removals, and to keep Regional management, Headquarters, the National Response Team (NRT), and the Regional Response Team (RRT) informed of activities on site, especially any unusual or significant incidents.

## **USERS AND USES OF POLREPS**

The principal purpose of POLREPs is to inform Regional management, EPA Headquarters, the RRT, the NRT, and the trustees of affected natural resources regarding:

- The source and circumstance of the release
- The identity of PRPs
- The removal activities performed
- The costs incurred for the removal activities
- The impact and potential impact of the release on public health and welfare, and on the environment

The primary users of POLREPs are Regional program managers and EPA Headquarters staff. Costs reported in POLREPs assist Regional section chiefs and Regional coordinators in anticipating the need to amend Action Memoranda and to request ceiling increases. Headquarters and Regional program managers use POLREPs for research purposes to assist in defining policy and developing guidance, and to learn about innovative approaches to hazardous substance containment, treatment, and disposal. POLREPs may be used to report under the Superfund Comprehensive Accomplishments Plan and the Strategic Planning and Management System. Final POLREPs are important to cost recovery personnel in the Regions, the Office of Enforcement Compliance Assurance (formerly the Office of Waste Programs Enforcement), and the Department of Justice for cost recovery and Statute of Limitations determinations.

## **DISTRIBUTION OF POLREPS**

POLREPs are sent to the Director of EPA's Emergency Response Division at:

E-Mail EPA 5511, or  
Fax No. (703) 603-9116 or (703) 603-9107

If neither one of these methods is available,  
POLREPs may be mailed to:

Director, Emergency Response Division (5202G)  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

POLREPs should be distributed to Regional  
branch/section chiefs and all agencies or parties  
participating in the removal activity, as  
appropriate, including, but not limited to:

- U.S. Coast Guard, Fax No. (202) 267-2165
- RRT representatives
- State representatives
- Local/county representatives
- U.S. Fish and Wildlife Service
- National Oceanic and Atmospheric  
Administration

## INFORMATION REQUIREMENTS FOR POLREPS

POLREPs should contain only factual information  
concerning a site. To make POLREPs more  
useful, precise measures (or best estimates) of  
area, volume, or weight should be used. The  
exact site location (city, county, state), coordinates  
(latitude/longitude), acreage, and boundaries  
should be included in an initial POLREP.  
Uncommon abbreviations, step-by-step notations,  
and chronological descriptions of work performed  
should not be used in POLREPs. Confidential  
and PRP-sensitive information should be avoided.

Regional practices may differ on the frequency of  
progress POLREPs. If there is little to report and  
the activities do not change substantially from  
week to week, routine progress POLREPs should  
be submitted once a month. Where the situation  
warrants, progress POLREPs should be submitted  
on a more frequent basis.

**Table 1: POLREP Outline**

### I. Heading

Date POLREP is written  
Site Name  
From  
To  
POLREP No.

### II. Background

Site No.  
Delivery Order No.  
Response Authority  
ERNS No.  
CERCLIS No.  
NPL Status  
State Notification  
Action Memorandum Status  
Start Date  
Demobilization Date  
Completion Date

### III. Site Information

- A. Incident Category
- B. Site Description
  - 1. Site location
  - 2. Description of threat
- C. Preliminary Assessment/Site Inspection  
Results

### IV. Response Information

- A. Situation
  - 1. Current situation
  - 2. Removal activities to date
  - 3. Enforcement
- B. Planned Removal Activities
- C. Next Steps
- D. Key Issues

### V. Cost Information

### VI. Disposition of Wastes

## POLREP FORMAT

The four types of POLREPs follow the same general format, with a few differences. To maintain consistent information, revise and summarize previously completed initial or progress POLREPs. Table 1 on page 3 provides a general POLREP outline. Call Gil Laskowski of ERD-RSCB at (703) 603-8719 for information about a WordPerfect macro package for preparing POLREPs.

## 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.



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