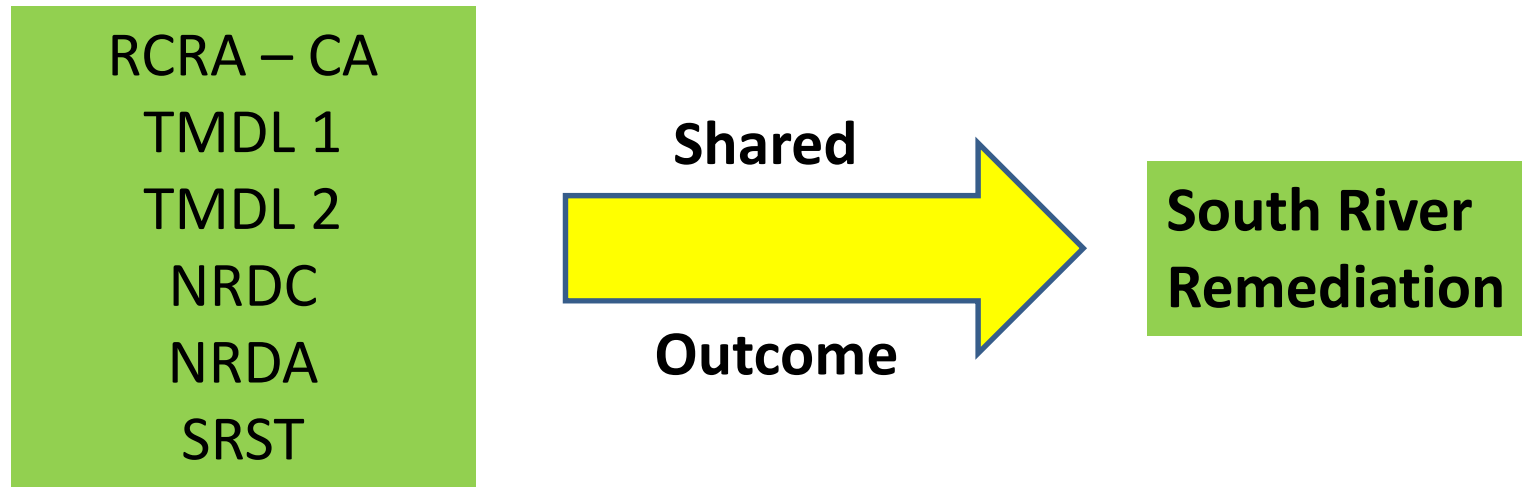


# **Program Integration Task Team**

**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