



Welcome to the CLU-IN Internet Seminar

CEC Training for OSCs...Access: Protecting EPA's Interests and Avoiding Personal Liability

Sponsored by: EPA Office of Superfund Remediation and Technology Innovation

Delivered: November 20, 2013, 1:00 PM - 3:00 PM, EST (18:00-20:00 GMT)

Instructors:

- Cliff Villa, EPA Region 10 (villa.clifford@epa.gov)

Moderators:

- Jean Balent, U.S. EPA Technology Innovation and Field Services Division (balent.jean@epa.gov)

Visit the Clean Up Information Network online at www.cluin.org

Seminar Homepage

The screenshot shows the EPA Technology Innovation and Field Services Division Seminar Homepage. The page includes a header with the EPA logo and the text "EPA Technology Innovation and Field Services Division". Below the header, there is a section titled "Join the seminar online" with a link to "Go to Seminar". Another section titled "Download Slides" has a link to "Download Slides". A third section titled "Feedback" has a link to "Feedback". The main content area contains a list of seminar topics, including "Air Quality Criteria for Particulate Matter", "Air Quality Criteria for Ozone", "Air Quality Criteria for Carbon Monoxide", "Air Quality Criteria for Nitrogen Dioxide", "Air Quality Criteria for Sulfur Dioxide", "Air Quality Criteria for Lead", "Air Quality Criteria for Cadmium", "Air Quality Criteria for Chromium", "Air Quality Criteria for Copper", "Air Quality Criteria for Nickel", "Air Quality Criteria for Silver", "Air Quality Criteria for Zinc", "Air Quality Criteria for Manganese", "Air Quality Criteria for Barium", "Air Quality Criteria for Beryllium", "Air Quality Criteria for Boron", "Air Quality Criteria for Bromine", "Air Quality Criteria for Calcium", "Air Quality Criteria for Chlorine", "Air Quality Criteria for Cobalt", "Air Quality Criteria for Fluorine", "Air Quality Criteria for Gallium", "Air Quality Criteria for Germanium", "Air Quality Criteria for Gold", "Air Quality Criteria for Hafnium", "Air Quality Criteria for Helium", "Air Quality Criteria for Hydrogen", "Air Quality Criteria for Iodine", "Air Quality Criteria for Iron", "Air Quality Criteria for Krypton", "Air Quality Criteria for Lanthanum", "Air Quality Criteria for Lithium", "Air Quality Criteria for Magnesium", "Air Quality Criteria for Manganese", "Air Quality Criteria for Mercury", "Air Quality Criteria for Molybdenum", "Air Quality Criteria for Neon", "Air Quality Criteria for Niobium", "Air Quality Criteria for Nitrogen", "Air Quality Criteria for Niobium", "Air Quality Criteria for Osmium", "Air Quality Criteria for Oxygen", "Air Quality Criteria for Palladium", "Air Quality Criteria for Phosphorus", "Air Quality Criteria for Potassium", "Air Quality Criteria for Radium", "Air Quality Criteria for Rubidium", "Air Quality Criteria for Rhenium", "Air Quality Criteria for Rhodium", "Air Quality Criteria for Selenium", "Air Quality Criteria for Silicon", "Air Quality Criteria for Silver", "Air Quality Criteria for Sodium", "Air Quality Criteria for Strontium", "Air Quality Criteria for Tellurium", "Air Quality Criteria for Thallium", "Air Quality Criteria for Thorium", "Air Quality Criteria for Tin", "Air Quality Criteria for Titanium", "Air Quality Criteria for Vanadium", "Air Quality Criteria for Xenon", "Air Quality Criteria for Yttrium", "Air Quality Criteria for Zirconium", "Air Quality Criteria for Zinc", "Air Quality Criteria for Zirconium".

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Feedback

Housekeeping

- Entire broadcast offered live via Adobe Connect
 - participants can listen and watch as the presenters advance through materials live
 - *Some materials may be available to download in advance, you are **recommended to participate live via the online broadcast***
- Audio is streamed online through by default
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- Q&A – use the Q&A pod to privately submit comments, questions and report technical problems
- This event is being recorded and shared via email shortly after live delivery
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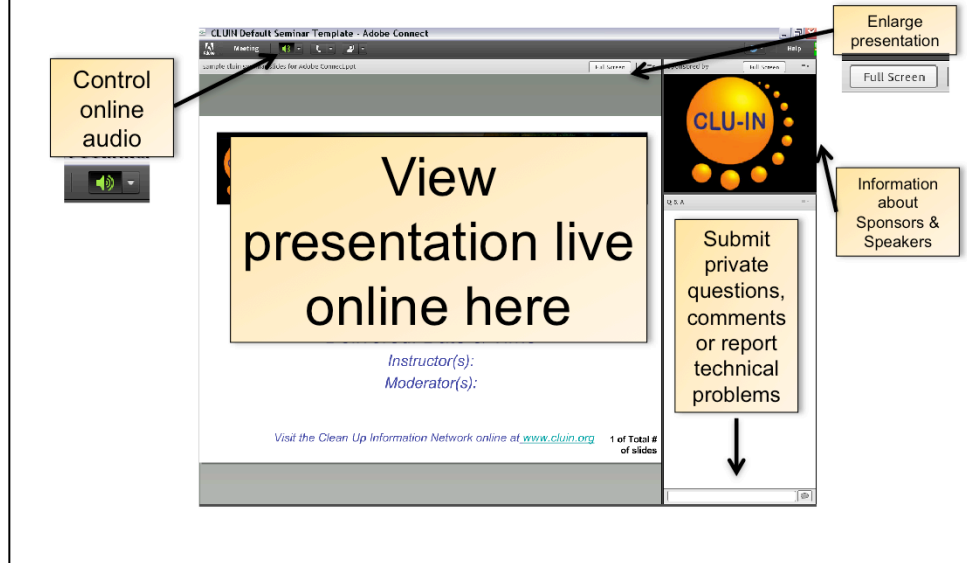
Although I'm sure that some of you have these rules memorized from previous CLU-IN events, let's run through them quickly for our new participants.

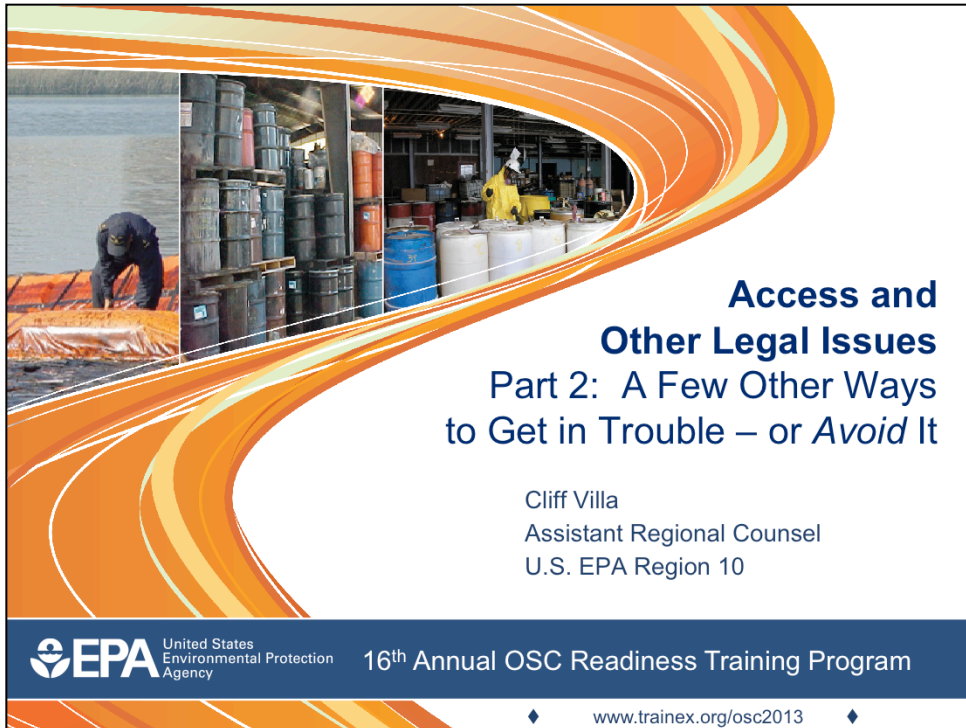
Please mute your phone lines during the seminar to minimize disruption and background noise. If you do not have a mute button, press *6 to mute #6 to unmute your lines at anytime. Also, please do NOT put this call on hold as this may bring delightful, but unwanted background music over the lines and interrupt the seminar.

You should note that throughout the seminar, we will ask for your feedback. You do not need to wait for Q&A breaks to ask questions or provide comments. To submit comments/questions and report technical problems, please use the ? Icon at the top of your screen. You can move forward/backward in the slides by using the single arrow buttons (left moves back 1 slide, right moves advances 1 slide). The double arrowed buttons will take you to 1st and last slides respectively. You may also advance to any slide using the numbered links that appear on the left side of your screen. The button with a house icon will take you back to main seminar page which displays our agenda, speaker information, links to the slides and additional resources. Lastly, the button with a computer disc can be used to download and save today's presentation materials.

With that, please move to slide 3.

New online broadcast screenshot






Access and Other Legal Issues

Part 2: A Few Other Ways to Get in Trouble – or *Avoid* It

Cliff Villa
Assistant Regional Counsel
U.S. EPA Region 10

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Bad News . . .

No matter what you do
(or don't do) for the
Government, you can be
sued personally for it.



Good News!

No personal liability for damages arising from the responsible execution of your job – even if your decisions are **wrong**.



Bad News

You can still get sued.

OSBORN v. HALEY (2007): Barry Haley (USFS) sued in 2003 by Patricia Osborn (contract employee), alleging conspiracy to cause wrongful termination.

The Washington Post

AN INDEPENDENT NEWSPAPER

Suing Civil Servants

RODNEY WESTFALL is chief of the Receiving Section at the Aviation Army Depot in Alabama. Osburn Rutledge is chief of the Breakdown and Bulk Delivery Unit, and William Bell is chief of Unloading Unit No. 1 at the same facility. These three federal employees, working men without large fortunes, have been sued for half a million dollars by a co-worker, William Erwin, who is a warehouseman. Mr. Erwin claims to have been injured when he picked up a bag of soda ash and inhaled some dust that came from the bag. He alleges that the bags were improperly stored at the warehouse and that he should have been warned that inhaling soda ash dust could be dangerous. Should his co-workers have to pay?

On Monday, the Supreme Court agreed to hear the case. At issue is whether all federal employees are immune from suit under state tort law for injuries allegedly caused by acts undertaken within the scope of their job. Whether they can be sued for constitutional deprivations is another question not considered here. There is no controlling statute. Except for the constitutional provision prohibiting suits against legislators for official speech, the doctrine of immunity in these cases has been developed, case by case, by judges. It has its roots in English common law. The protection of legislators dates to 1599 and of judges and court officials to 1608. But insulating executive employees is relatively new, first appearing in Britain in 1895 and in the United States a year later. In the intervening years the

cases that have reached the Supreme Court have involved high-level officials who were exercising discretionary rather than operational functions—*discretionary* rather than *operational* functions—that is, they were policy makers as opposed to workers who were just doing routine chores that did not require them to make decisions.

Courts at the appellate level are divided on the question of how far down the line immunity extends. Some have ruled that only those at the top, whose discretionary acts must be protected if the government is to be run efficiently and without the threat of constant lawsuits, are protected. In other words, any federal employee is immune from suit for damage caused when he is acting within the scope of his official duties.

In addition to this confusion, each circuit has different standards for determining which employees are exercising discretionary functions. Most plaintiffs wouldn't even be suing GS-16 or GS-11s. They would sue the United States under the Tort Claims Act for damage done by its agents. But in the Alabama case, and many others of this kind, the plaintiff is also a government employee and he has been injured at work so he cannot sue his employer for compensation claim—and he therefore resorts to actions against his colleagues. As long as litigation in the tort field proliferates, it is important that clear lines of liability and immunity be drawn. Until the Supreme Court clarifies the issue, a lot of people in this town are at risk, and they probably don't even realize it.

X-20

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9



The Westfall Act

(The Federal Employees Liability Reform and Tort Compensation Act of 1988)
28 U.S.C. § 2679(d)

- Limited immunity for employee acting within **scope of employment**.
- Upon certification that employee was acting within scope of employment, claim against employee should be **dismissed**.
- Suit may then proceed against Government, governed by FTCA.

Qualified Immunity

Ashcroft v. al-Kidd (2011): Former U.S. Attorney General Ashcroft entitled to qualified immunity from suit by U.S. citizen subjected to erroneous arrest and detention.



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11

AG John Ashcroft sued personally by Lavoni Kidd, star football player for University of Idaho, arrested at Dulles Airport attempting to board plane to study in Saudi Arabia. Held for 15 days, shackled, strip-searched, then 13 months supervised detention. No charges ever filed.



Qualified Immunity

- ◆ Criminal prosecution
- ◆ Civil liability



Qualified Immunity

◆ No civil liability if:

1. Your conduct was reasonable to carry out your duties, and
2. Your conduct did not violate any “clearly established” rights.



“Clearly Established” Rights

- ◆ Common law
- ◆ Statutory provision
- ◆ U.S. Constitution

Tort Claims

- ◆ Wrongful act or omission causing injury through negligence or intentional act.
- ◆ Examples:
 - tortious interference with contract
 - conversion
 - trespass
 - negligence




Tort Claims


“The OSC/RPM is responsible for addressing worker health and safety concerns at a response scene, in accordance with § 300.150.”

- NCP at 300.135(I)

<p align="center">IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA HELENA DIVISION</p> <p align="center">* * * * *</p>	
<p>JUDITH FICEK</p> <p align="center">Plaintiff,</p> <p align="center">v.</p> <p>UNITED STATES of AMERICA by and through the ENVIRONMENTAL PROTECTION AGENCY; CAMP, DRESSER & MCKEE, INC.; CDM FEDERAL PROGRAMS CORPORATION; PORTEC CONSTRUCTION EQUIPMENT CO.; KOLBERG-PIONEER, INC.; JOHN DOES 1-5; and JOHN DOES 6-10,</p> <p align="center">Defendants.</p>	<p>Cause No. CV-09-39-H-DWM</p> <p align="center">COMPLAINT</p>


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“John Doe” includes RPM (?) for Upper Ten Mile Creek Superfund Site in MT.

- 
10. John Does 1-5 are individuals or entities not yet specially known to Plaintiff who were involved in the mine reclamation work at Remini and who bear liability for Plaintiff's injuries.
 11. John Does 6-10 are individuals or entities not yet specially known to Plaintiff who were involved in the design, manufacture, labeling, sale, distribution, or maintenance of the industrial equipment that caused Plaintiff's injuries.



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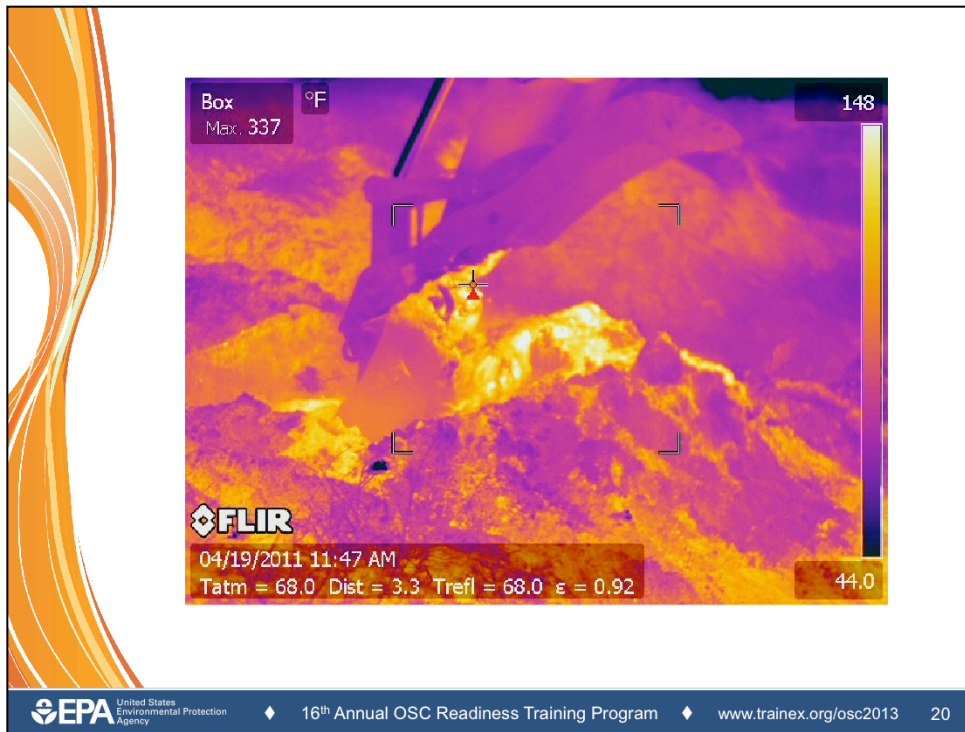


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18



Prosser Pomace Pits, WA





Statutory Claims

- ◆ Violation of a civil statute
 - e.g., Privacy Act, 5 U.S.C. 552a(b)

Mercury victim leaves hospital

Cleanup continues at two South Sixth Street homes where youths played with metallic liquid for months

Also led them to remove such materials from their homes that they played with the toxic material.

The cost of the cleanup not known yet, but it could reach as much as \$500,000 and \$200,000. "This is one of the worst cases of mercury poisoning," said

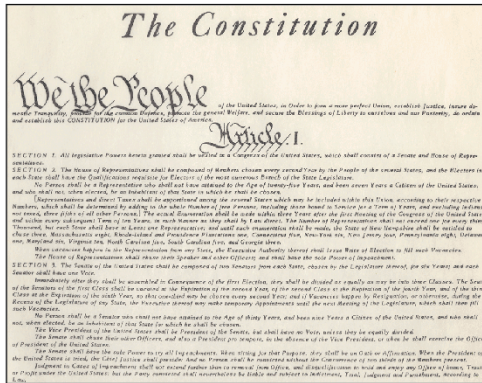


Constitutional Claims

Bivens claim: alleged violation of constitutional right.

- *Bivens v. Six Unknown Agents of the Federal Bureau of Narcotics* (1971)

Re-Introducing: The U.S. Constitution



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24



4th Amendment

“The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated. . . .”



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25



4th Amendment

“The right of the people to be secure in their
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4th Amendment

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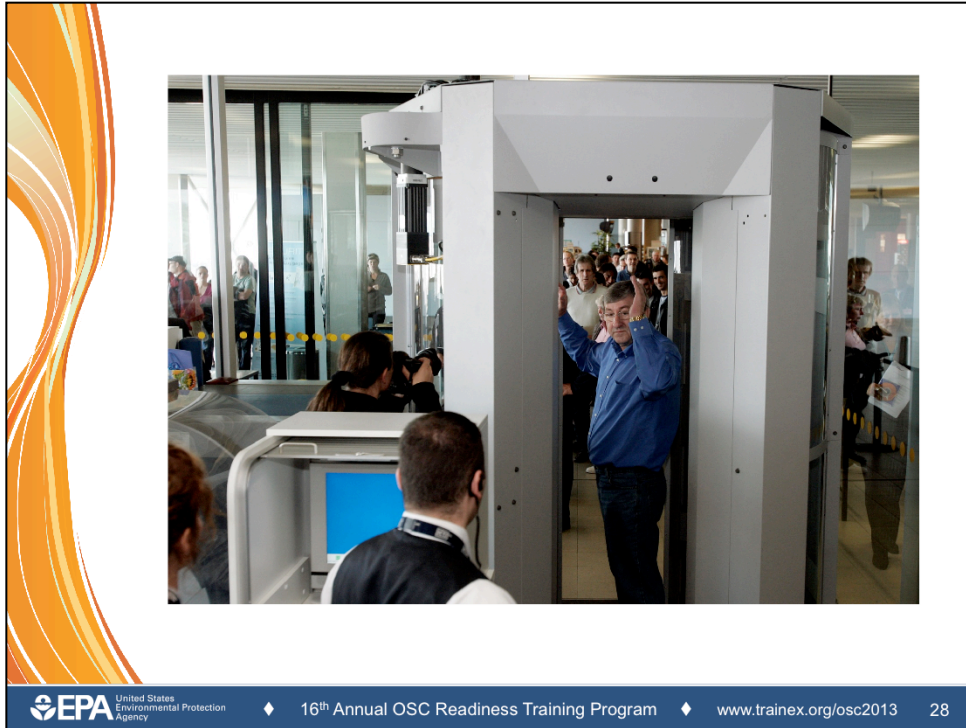


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27





4th Amendment

“The right of the people to be secure in their
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29



Rexburg Drum Site, ID



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30





Uniform Relocation Regulations

“Dwelling” = place of permanent **or** customary and usual residence of a person, according to local **custom** or law. . . .” 49 C.F.R. 24.2(a)(10)



Dow Chemical v. EPA (1986)

- ◆ Denied entry for inspection, EPA flew over and photographed 2000-acre industrial facility.
- ◆ Supreme Court: For “commercial property . . . expectation of privacy . . . differs significantly from the sanctity accorded an individual’s home”
- ◆ *However*, “an electronic device to penetrate walls or windows so as to hear and record confidential discussions . . . would raise very different and far more serious questions.”

4th Amendment

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4th Amendment

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4th Amendment “Search”?

Riverdale Mills v. Pimpare (1st Cir. 2004)

- ◆ Pimpare, EPA inspector, samples wastewater in manhole, finds evidence of CWA vio by RM.
- ◆ RM prosecuted, but sampling evidence suppressed
- ◆ USA drops charges
- ◆ RM brings *Bivens* claim against Pimpare, alleging unreasonable search
- ◆ HELD: RM loses. Sampling ≠ “search” because RM had no reasonable expectation of privacy in wastewater



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36

For frightening story (from EPA perspective), see 60 Minutes story from 2001, available on YouTube.

4th Amendment “Seizure”?



4th Amendment

“ . . . and no Warrants shall issue, but upon **probable cause**, supported by **Oath or affirmation**, and particularly describing the **place** to be searched, and the persons or **things** to be seized.”

4th Amendment

“Probable cause” = difference between criminal warrant and administrative warrant

CERCLA 104(e)(1): “reasonable basis to believe there may be a release or threat of release of a haz substance or P/C.”

4th Amendment

“Oath or affirmation” =

- oral testimony
- affidavit or declaration

4th Amendment



26 North Center St., Rexburg, Idaho 83440 * 208-359-3010

Incident Narrative – Declaration of Observance & Findings

Incident Date: July 7, 2010 Incident Number: 10-5254

Incident Commander: Captain Robert Kohler

1. I am the initial on-scene Incident Commander (hereinafter "IC") for the Madison Fire Department's response to 6545 South 2000 West, Rexburg, Idaho 83440. I am stationed at station #1 in Rexburg, Idaho. I have been employed with the department since April 2003. From April 2003 to October of 2005, I served as a Paid-on-call member of the department. From October 2005 to January 2010, I served as a full time Paramedic/Firefighter, responsible for responding to EMS and fire incidents. From January 2010 to June 2010, I was promoted to Step-up-Captain and acted as Incident commander on multiple incidents. Currently I am serving as Captain, responsible for Incident command, and coordinating response efforts from Madison Fire Department.

2. The address we responded to is owned and occupied by Mr. Max Spatig--the site consists of approximately ¼ Acre lot with a single family residence, surrounded by various vehicles and one out building. The Madison County Sheriff's Office requested assistance from the Madison Fire Department in assessing multiple containers of paint related material. The containers had been



4th Amendment

“Particularly describing . . . the **place** to be searched . . .”

the property located at 6545 S. 2000 West (“the Site”) in Rexburg, Idaho. The Site property has a legal description of Township 5, Range 39, Section 25, Lot 51, and is identified in county records as Madison County Parcel RP05N39E254560A. The Site property is described to include a single-story, single-family dwelling blue in color with white trim. The Site property also includes an outbuilding, described as 8 x 12 feet, and a number of old vehicles in various states of disrepair.

4th Amendment

“Particularly describing . . . **things** to be seized.”

Approximately 3,000 individual containers are staged at the Site, pending disposal characterization, bulking, packaging for shipping and disposal. The containers are staged on plastic sheeting, but otherwise exposed to the elements. The professed owner of the material, Max Spatic, is under Madison County court order to not enter the



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43

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

IN THE MATTER OF:

PROPERTY LOCATED AT
6545 S. 2000 West
REXBURG, ID 83440
MADISON COUNTY, IDAHO,
T 5, R 39, S25, LOT 51

Case No.

ADMINISTRATIVE WARRANT
FOR ENTRY, SAMPLING, AND
INSPECTION PURSUANT TO 42
U.S.C. § 9604

TO: MICHAEL S. SPATIG, MAX SPATIG, AND ANY OFFICER, EMPLOYEE, OR
DESIGNATED REPRESENTATIVE OF THE UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY OR OTHER DESIGNATED GOVERNMENT OFFICER,
AND TO ANY UNITED STATES MARSHAL:

An *Ex Parte* Application for an Administrative Warrant for Entry pursuant to Section 104
of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended,
42 U.S.C. § 9604, Memorandum of Law in Support of *Ex Parte* Application for Administrative
Warrant, and declarations in support thereof, have been filed with this Court, Together, these



5th Amendment: Due Process

“No person . . . shall be deprived
of life, liberty, or property, without
due process of law.”

5th Amendment: Due Process

- ◆ Substantive due process
- ◆ Procedural due process





5th Amendment: Substantive Due Process

Benzman v. Whitman (2d Cir. 2008): class action following 9/11 by residents and workers of Lower Manhattan.

Claim: false statements by EPA Administrator deprived plaintiffs of truth about WTC dust and opportunity take health precautions.



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47



5th Amendment: Substantive Due Process

District Court: Plaintiffs' claim stated a violation of clearly established "substantive due process right to be free from official gov't policies that increase the risk of bodily harm[.]"



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48



5th Amendment: Substantive Due Process

Circuit Court: Substantive due process claim requires conduct that “shocks the conscience”

- special relationship, or
- state-created danger

5th Amendment: Substantive Due Process

Circuit Court: “Special relationship” between government actor (Whitman) and victim?





5th Amendment: Substantive Due Process

Circuit Court: State-created danger?

Although the complaint contains numerous allegations that various employees within EPA were aware of data indicating health risks, there is no allegation that Whitman, from whom damages are sought in her personal capacity, was herself aware of such information.



5th Amendment: Procedural Due Process

Each order to compel access shall contain –

... a provision advising the person who failed to consent that an officer or employee of the agency that issued the order will be available to confer with respondent prior to the effective date of the order. . . .

-- NCP at 40 CFR 300.400(d)(4)(iv)(C)



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52



5th Amendment: Takings

“ . . . nor shall private property
be **taken** for public use, without
just compensation.”

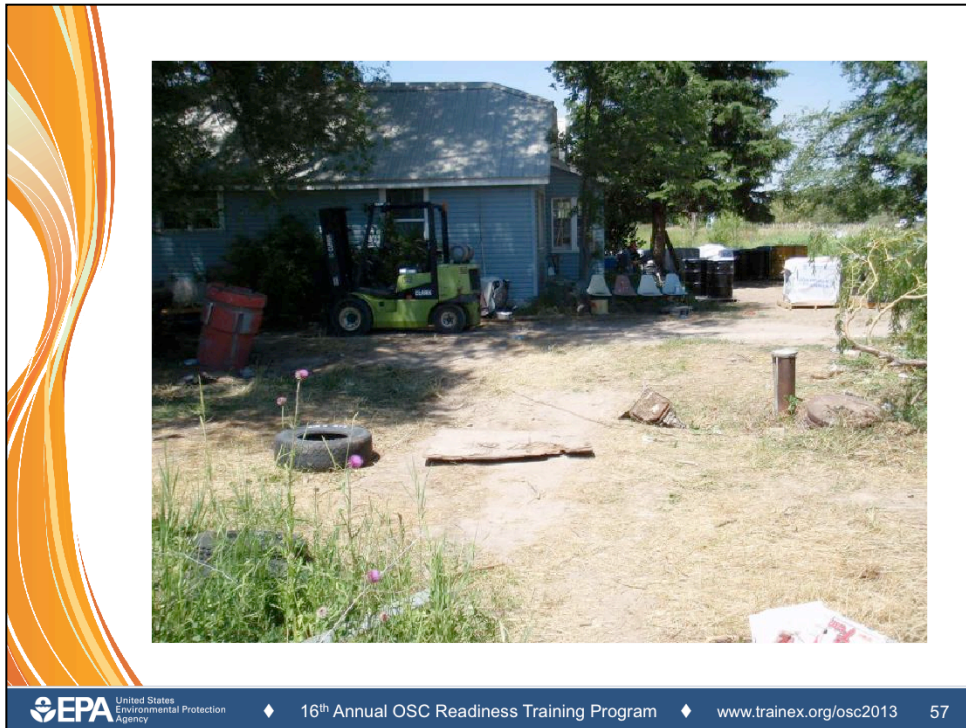
“Takings”?

- ◆ Regulatory takings
- ◆ Physical takings

Physical Takings

- ◆ 30-foot cable across rooftop
 - Loretto (1982)
- ◆ Monitoring well
 - Hendler v. U.S. (Fed. Cir. 1991)
- ◆ Landfill methane
 - Charles George Trucking (Mass. 1988)
- ◆ Disposal of asbestos waste back into mine
 - U.S. v. W.R. Grace (Mont. 2001)







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58



Takings?

- ◆ Depressing PRP's stock price?
- ◆ Harming PRP's brand value?
- ◆ Increasing PRP's cost of financing?

- ◆ D.C. Circuit: "insufficient" to merit constitutional protection.
 - GE v. EPA (2010)



“Just Compensation”

- ◆ *Do we pay?*
- ◆ *How do we pay?*
- ◆ *Who do we pay?*
- ◆ *How much do we pay?*



Just Compensation: *How?*

CERCLA grants EPA authority and discretion to use Superfund monies for 'payment of ... compensation for property loss ... incurred as a result of carrying out the NCP'

- EPA Policy (OSWER 9225.4-01), Sept. 1995



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62



Just Compensation: *Who?*

EPA Policy (Sept. 1995)

- ◆ PRPs are **generally** not eligible for compensation.
- ◆ No coverage for losses due to contractor negligence.



Just Compensation: *How much?*

In general: “fair market value”



Just Compensation: *How much?*

In most situations, EPA should provide replacement value for essential furniture items (see Attachment 8 for a list of essential furniture items) and depreciated value for non-essential personal property.

- Temporary Relocations Implementation Guidance, OSWER Dir. 9230.0-97 (2002)



Just Compensation: *Response Hierarchy*

- ◆ Restore
- ◆ Replace
- ◆ Reimburse

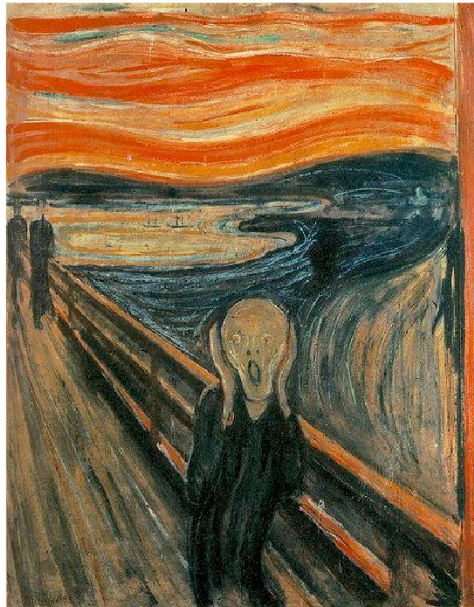
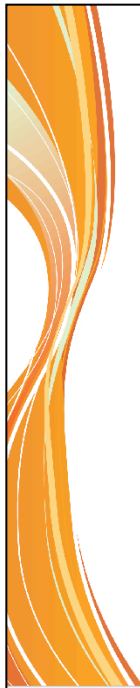


8th Amendment

“. . . nor cruel and unusual
punishments inflicted.”

8th Amendment:

- ◆ 4/11/2011 08:52 PM
- ◆ “Mr _____ - I will be happy to give up all my civil and especially my 8th ammendment [sic] rights via your property rights waiver. Kindly bring it by tomorrow preferably around 4pm.”



What Should You Do?



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What To Do?

Use good judgment.



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70

Remember: you don't have to be right, just reasonable.

What To Do?

Get legal advice.

- Call us anytime. Discuss options for obtaining access, or any legal question.

What To Do?

Get a warrant.

- for assessment
- for response

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

IN THE MATTER OF:

Case No. '11-MC-9100

**PROPERTY LOCATED AT
909 WASHINGTON STREET
OREGON CITY
CLACKAMAS COUNTY
OREGON**

**ADMINISTRATIVE WARRANT
FOR ENTRY, SAMPLING,
AND INSPECTION PURSUANT
TO 42 U.S.C. 9604**

**TO: NANCY ROBERTS AND ANY OFFICER, EMPLOYEE, OR DESIGNATED
REPRESENTATIVE OF THE UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY OR OTHER DESIGNATED GOVERNMENT OFFICER, AND TO ANY
UNITED STATES MARSHAL:**

*An Ex Parte Application for an Administrative Warrant for Entry pursuant to Section 104
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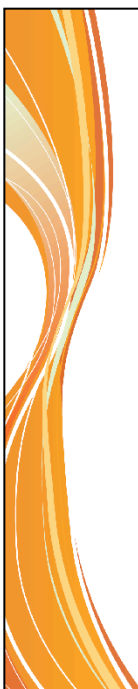


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73

What To Do?

Comply with warrants and access agreements.



1) Total Paint-Related Material (Flammable) **3151**
 Summary: 3151 containers of paint-related materials were consolidated into 54 FlexPaks (one-cubic yard each) for disposal

2) Total Bulked Flammables **149**
 Summary: 149 containers of bulk flammable waste were consolidated into 7 fifty-five gallon drums for disposal

3) Total Overpacked Containers **178**
 Summary: 178 containers (138 liquids, 40 solids) of acids, bases, and oxidizers were consolidated into 14 overpack containers for disposal

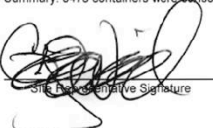
Acid Subtotal 40
 Summary: 40 containers of acid (40 liquid, 0 solid) were consolidated into 2 overpack containers for disposal

Base Subtotal 96
 Summary: 96 containers of base (95 liquid, 1 solid) were consolidated into 10 overpack containers for disposal

Oxidizer Subtotal 42
 Summary: 42 containers of oxidizer (3 liquid, 39 solid) were consolidated into 2 overpack containers for disposal

Total Containers Removed Off-Site for Disposal **3478**

Summary: 3478 containers were consolidated into 75 containers to be removed from site for disposal



 Site Representative Signature

208-372-5773
Telephone No.

7-22-10
Date

EPA Federal OSE
Title

1350
Time



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75

What To Do?

Obey the law.

- split samples
- receipt for samples
 - CERCLA 104(e)(4)(B)

What To Do?

Obey the law.

“Unless (A) [“emergency”] ... or (B) [site is on the NPL] or (C) continued response action is otherwise appropriate and consistent with *remedial* action to be taken obligations from the Fund ... shall not continue after \$2,000,000 has been obligated for response actions or 12 months has elapsed....”

- CERCLA 104(c)(1) (emphasis added)

What To Do?

Get it in writing.

- approval memo
- action memo
 - supported by admin record
 - signed by delegated official
- Administrative Order on Consent

What To Do?

Get it in writing.

- consent for access
- relocation agreement
- property compensation

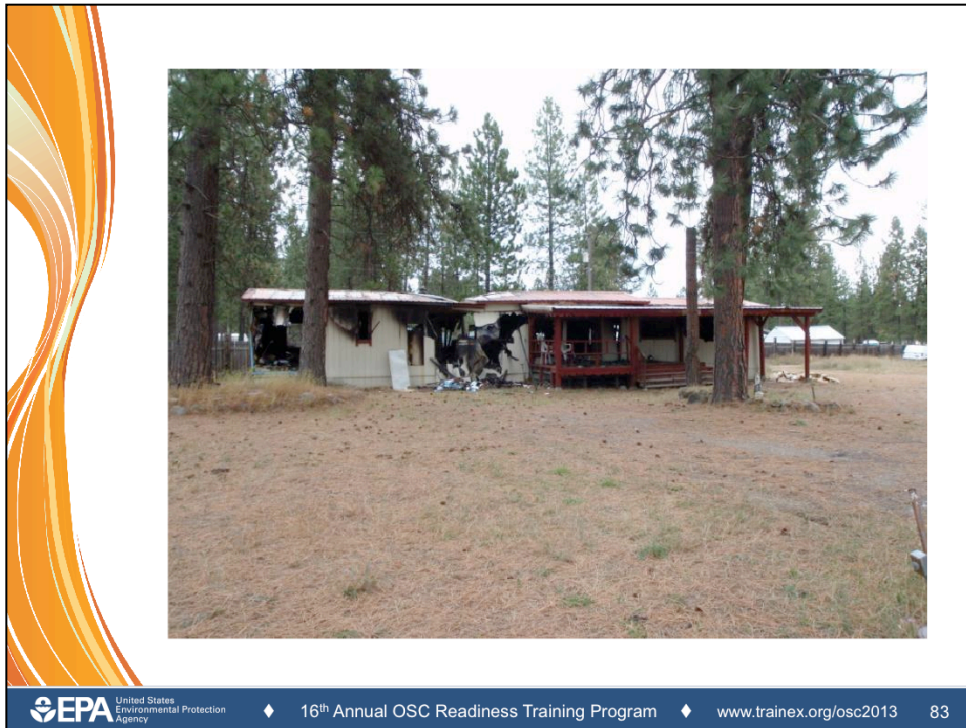
What To Do?

Get proof!

- Phone log
- Photo log
- Property log









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84



What To Do?

Get professional liability insurance....



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86

What To Do If Threatened with Suit?

- ◆ Don't panic.
- ◆ Call ORC.



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87

Contact ORC for any threat of lawsuit or actual complaint. If mere threat of lawsuit, no response may be needed because most often, threats are not followed by actual filing of civil complaint. But please contact ORC to provide notice of any threat and discuss options for response.

If complaint actually filed, remember the Westfall Act! ORC drafts proposed certification that employee acts were within “scope of employment.”

If any complaint or threat of lawsuit also accompanied by physical threat, contact ORC immediately, as this may constitute a federal crime subject to investigation.



What To Do If Threatened with Suit?

Two-part test for DOJ representation:

1. Scope of employment
2. Interest of the United States

What To Do If Threatened with Suit?

Got professional liability insurance now?



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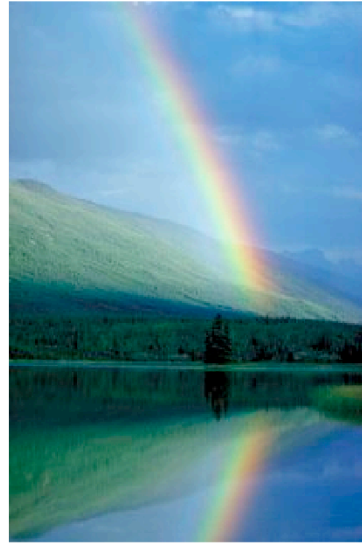
89

EPA policy (2008) authorizes subsidy of 50% of premiums for PLI, up to \$160/year, for (1) “law enforcement officers”; (2) “supervisors”; and (3) “management officials.” So far, despite petitions, OGC and HR have denied subsidies for OSCs, civil inspectors, and other EPA staff.

Questions?

Cliff Villa
EPA Region 10
(206) 419-2744

OSC Readiness Training Program



Certificates

- ◆ If you are interested in receiving a certificate for participating in this training, please send an email to Austin Oelschlager, Tetra Tech, at austin.oelschlager@tetrattech.com
- ◆ An electronic certificate will be emailed to you within 30 days

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- To view a complete list of resources for this seminar, please visit the [Additional Resources](#)
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