

Note: EPA is currently developing guidance to prepare an Institutional Control Implementation and Assurance Plan (ICIAP). This outline suggests the recommended contents of the ICIAP. The party tasked with preparing the ICIAP may use this outline as a guide to prepare the plan.

Table 1: Recommended Contents of an ICIAP

| Report sections ... | should include these topics when appropriate: |
|----------------------------|---|
| 1.0 Introduction | <ul style="list-style-type: none"> <input type="checkbox"/> Entity that prepared the ICIAP <input type="checkbox"/> Name and location of site requiring ICs <input type="checkbox"/> Agency responsible for IC oversight |
| 2.0 Site Details | <ul style="list-style-type: none"> <input type="checkbox"/> Site description <ul style="list-style-type: none"> ▪ Site identification ▪ Location ▪ Site area <input type="checkbox"/> Site history <ul style="list-style-type: none"> ▪ Previous site uses ▪ Response action summary ▪ IC requirements from decision document ▪ Other information <input type="checkbox"/> Contaminants <ul style="list-style-type: none"> ▪ Identify contaminants of concern (COC's) ▪ Physical boundaries of affected resources <input type="checkbox"/> Current site information <ul style="list-style-type: none"> ▪ Parcel ownership/occupancy information ▪ Property interest and resource ownership ▪ Current and anticipated future site land use ▪ Responsible parties and other stakeholders ▪ Local government information |
| 3.0 Mapping | <ul style="list-style-type: none"> <input type="checkbox"/> Map or maps showing entire IC coverage area(s), including clear boundaries <ul style="list-style-type: none"> ▪ Location of contamination ▪ Location of engineering controls ▪ Location of use restrictions |
| 4.0 IC Instruments | <ul style="list-style-type: none"> <input type="checkbox"/> Key components of IC instruments <ul style="list-style-type: none"> ▪ IC objectives ▪ Use restrictions ▪ Current and reasonably anticipated future land use(s) ▪ IC instrument duration <input type="checkbox"/> Instrument categories <ul style="list-style-type: none"> ▪ Proprietary controls ▪ Government controls ▪ Enforcement and permit tools with IC components ▪ Informational devices <input type="checkbox"/> IC relationship matrix |

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| 5.0 IC Implementation | <input type="checkbox"/> Table showing, for each IC: <ul style="list-style-type: none"> ▪ Instrument name ▪ Instrument category ▪ Instrument type ▪ IC objectives/use restrictions ▪ Implementation prerequisites ▪ Implementation event ▪ Implementation date ▪ Person or organizations responsible for implementation ▪ Instrument lifespan ▪ Conditions for termination of IC |
| 6.0 IC Maintenance | <input type="checkbox"/> Instrument monitoring <ul style="list-style-type: none"> ▪ Transaction-related ▪ Non-transaction related <input type="checkbox"/> Periodic IC assurance monitoring <input type="checkbox"/> Recordkeeping, reporting and notifications <input type="checkbox"/> Verifying IC effectiveness <ul style="list-style-type: none"> ▪ IC implemented ▪ IC effective ▪ IC breach/deficiencies |
| 7.0 IC Enforcement | <input type="checkbox"/> Triggering events for enforcement <input type="checkbox"/> Overarching information needed |
| 8.0 IC Modification & Termination | <input type="checkbox"/> Entity responsible for deciding whether modification may occur <input type="checkbox"/> Entity responsible for deciding whether termination may occur <input type="checkbox"/> Modification process <input type="checkbox"/> Termination process (if applicable) |