



1

Overview

- **Successful Superfund Site Redevelopment Strategies & Tools for Local Governments**
Speakers: Frank Avvisato and Bill Denman – EPA Superfund Redevelopment Program
- **Addressing Superfund Liability Concerns of Local Governments**
Speakers: Matt Sander and Victor Zertuche – EPA Office of Site Remediation Enforcement
- **Question and Answer Session**
Speakers: Frank Avvisato, Bill Denman, Matt Sander and Victor Zertuche

2

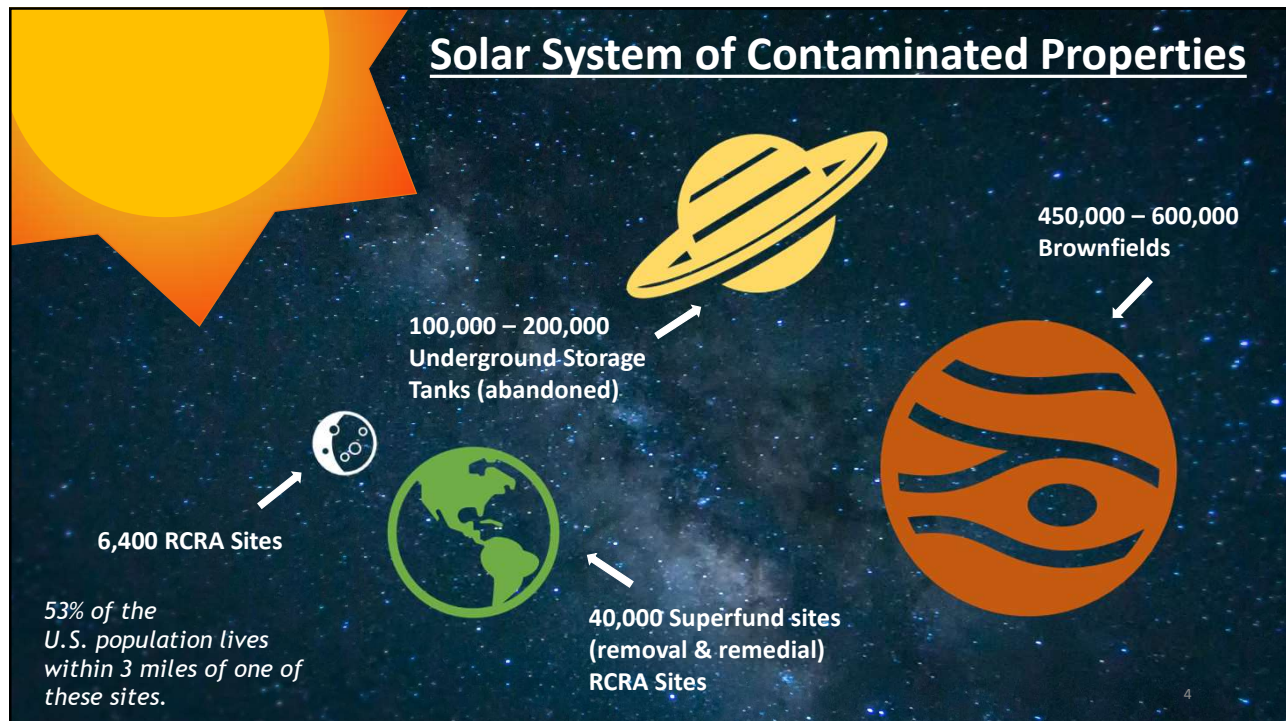
Superfund Redevelopment Program

Supports EPA staff and works with communities and other partners in considering future use opportunities and integrating appropriate reuse options into the cleanup process.



3

3



4

BENEFITS OF REUSE *at Superfund sites*

For every acre of contaminated property that gets redeveloped, 4.5 acres of greenfields are preserved.

- George Washington University study

Benefit to Community:

Brings jobs; increases the tax-base; revitalizes neighborhoods and restores a sense of community by bringing housing, retail, recreation or ecosystem services.

Benefit to EPA:

Brings certainty to anticipated land use with a new owner who is obligated to be cooperative and provide access, who will be a good steward of the site, and who may be willing to take on part or enhance the cleanup.

5

5

Examples of Successful Superfund Redevelopment



Industri-Plex Superfund site in Woburn, Massachusetts



Wells G & H Superfund site in Woburn, Massachusetts

6

6

Sites Can and Are Redeveloped at Any Stage of Cleanup



EPA benefits from reuse information at any stage of the cleanup process because EPA continues to ensure sites meet protectiveness standards.

7

7



8

8



9

Roles for Local Government in Superfund Reuse

- Acquire the site for long-term use or transfer.
- Tax foreclosure to transfer properties to active owners.
- Promoting financial viability of site reuse with tax increment financing, enterprise zones and opportunity zones.
- Helping with access, site assessments and institutional controls.
- Rezoning, community planning, infrastructure improvements, and more.



10

10

Most Common EPA Superfund Redevelopment Tools

1. Prospective Purchaser Inquiry (PPI) calls
2. Comfort Letters
3. Fact Sheets
4. EPA Guidance and Handbooks
5. Reuse Planning
6. EPA Agreements

www.epa.gov/superfund-redevelopment-initiative



11

Prospective Purchaser Inquiry (PPI) calls

PPI calls are a resource that EPA can offer to prospective purchasers, tribal and local governments to allow them to make a timely and informed business decisions. 4 discussion items:

1. Site status and current/future site restrictions.
2. Compatibility of proposed reuse with cleanup.
3. Liability protections.
4. EPA Superfund and/or Windfall liens.



12

12

Fact Sheets

There are many different fact sheets to provide useful information to prospective purchasers, tribes and local governments, including:

- Top Ten Questions to Ask When Buying a Superfund Site
- EPA site-specific reuse fact sheets
- Case studies/economic reports
- And more!



13

Opportunity Zone Fact Sheet

- Tax incentives to attract private investment into economically-distressed communities.
- **GOOD NEWS!** Superfund sites can be eligible!! There are thousands of removal sites and 343 Superfund sites on the National Priorities List in OZs.
- 10% of U.S. land mass and 98% of Puerto Rico in an OZ.
- A qualified entity that purchases real property located with an Opportunity Zone from a local government that acquired the property through an involuntary transfer (e.g., tax foreclosure, bankruptcy, abandonment or receivership) can treat the land and structures as "automatically" meeting the eligibility criteria for the OZ tax benefits.



14

Reuse Planning & Community Engagement

Reuse Planning: Support to bring together community site stakeholders to evaluate site cleanup considerations, future land use and community goals regarding the property and community benefits.



15

15

Acquisition - Blackburn & Union Privileges Site



16

16

Planning, Rezoning & ICs - Midvale Slag Site



"The RfR Determination has been very helpful. We have been able to attract and reassure developers and businesses that the site is safe and protective. EPA had clearly stated that the Agency was comfortable with the reuse of the site."

- Midvale Mayor JoAnn Seghini

17

Liability Protections - Former Spellman Engineering Site

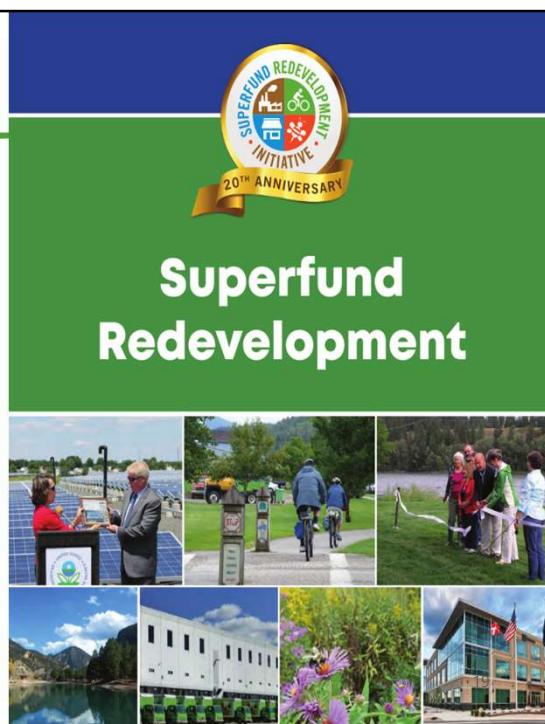


18

18

Take Aways

1. EPA's ultimate goal with the Superfund program is to return sites back to productive use in a protective manner.
2. Local governments play an important role in successful reuse – which can include short- and long-term acquisition, tax foreclosure, zoning, financial incentives, site restriction implementation, and more.
3. There are EPA Superfund redevelopment tools, liability protections, resources and support available for local governments, communities and redevelopers.



19

Superfund Redevelopment Coordinators by Region

www.epa.gov/superfund-redevelopment-initiative/regional-redevelopment-contacts

Region	Name	Phone	Email
1	Joe LeMay	617-918-1323	lemay.joe@epa.gov
2	Jaclyn Kondrk	212-637-4317	kondrk.jaclyn@epa.gov
3	Chris Thomas	215-814-5555	thomas.christopher@epa.gov
4	Shelby Johnston	404-562-8287	johnston.shelby@epa.gov
	Scott Miller	404-562-9120	miller.scott@epa.gov
	Joydeb Majumder	404-562-9121	majumder.joydeb@epa.gov
5	Thomas Bloom	312-886-1967	bloom.thomas@epa.gov
6	Casey Luckett Snyder	214-665-7393	luckett.casey@epa.gov
7	Tonya Howell	913-551-7589	howell.tonya@epa.gov
8	Fran Costanzi	303-312-6571	costanzi.frances@epa.gov
9	Grace Ma	415-947-4212	ma.grace@epa.gov
10	Dustan Bott	206-553-5502	bott.dustan@epa.gov
	Piper Peterson	206-553-4951	peterston.piper@epa.gov

20

20

For More Information:

Frank Avvisato

Superfund Redevelopment Program

Project Manager

(703) 603-8949

avvisato.frank@epa.gov**Bill Denman**

Redevelopment and Chemicals

Branch Chief - EPA Region 4

(404)-562-8939

denman.bill@epa.gov

Superfund Redevelopment Program website:

www.epa.gov/superfund-redevelopment-initiative

21

21

Addressing Superfund Liability Concerns of Local Governments

Matt Sander and Victor Zertuche

EPA Office of Site Remediation Enforcement

22

Addressing Superfund Liability Concerns of Local Governments



Matthew Sander

- Liability Protections under Sections 101(20)(D), 107(b)(3), and 101(35)(A);
2020 EPA Local Government Acquisition Guidance

Victor Zertuche

- BFPP Liability Protection and 2019 EPA Common Elements Guidance
- EPA Site-Specific Enforcement Tools

U.S. Environmental Protection Agency

23

23

Enforcement Support of Site Reuse



Enforcement's role in reuse at Superfund sites (*i.e.*, sites of federal interest):

- Reduce liability barriers while protecting human health and the environment
- Encourage information sharing and responsive communication
- Promote innovative solutions and partnerships with long-term results
- Use of enforcement guidance and site-specific tools to facilitate reuse

Enforcement role at brownfield sites (*i.e.*, sites not of federal interest):

- Assist with eligibility decisions for grant applicants
- Reduce liability barriers to reuse by clarifying enforcement intentions

U.S. Environmental Protection Agency

24

24



Superfund Liability Concerns of Local Governments

Superfund Sites – Section 107(a)

- Owner or operator can be liable for the costs or performance of a cleanup
- Strict liability
- Joint and several liability

Brownfield Sites – Section 104(k)

- Eligible entities must demonstrate they are not potentially responsible for contamination before they can receive a grant for a brownfield site

U.S. Environmental Protection Agency

25

25



Key Superfund Liability Protections

Exempt from definition of “owner or operator” thus exempt from liability without having to make an affirmative defense:

- State and local government acquisitions – Section 101(20)(D)
- Secured creditors – Section 101(20)(F)-(H)

Not liable if can make an affirmative defense:

- Bona fide prospective purchasers – Sections 101(40) and 107(r)
- Third party defense – Section 107(b)(3)
- Innocent landowners – Sections 107(b)(3) and 101(35)(A)
- Contiguous property owners – Section 107(q)
- Rendering care or emergency response – Section 107(d)

U.S. Environmental Protection Agency

26

26

Exemption from Owner or Operator Liability



- Section 101(20)(D) exempts a unit of state or local government from Superfund liability when it acquires ownership or control of a contaminated property through:
 - Seizure or otherwise in connection with law enforcement activity
 - Bankruptcy
 - Tax delinquency
 - Abandonment
 - By virtue of its function as sovereign
- Exemption does not apply to any state or local government that has “caused or contributed to the release or threatened release of a hazardous substance” from the property

U.S. Environmental Protection Agency

27

27

Guidance on State and Local Government Acquisitions



Superfund Liability Protections for Local Government Acquisitions after the Brownfields Utilization, Investment, and Local Development Act of 2018 (June 15, 2020)

www.epa.gov/enforcement/guidance-superfund-liability-protections-local-government-acquisitions

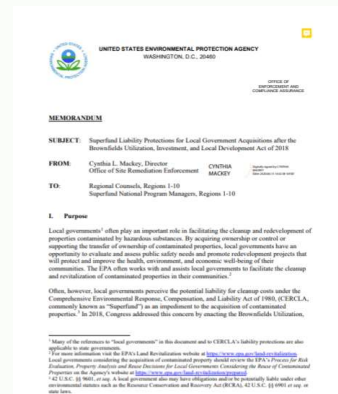
Need for Guidance

- 2018 BUILD Act
- 2017 EPA Superfund Task Force Rec. 31

Stakeholder Input

- EPA Regions, OLEM, OGC, DOJ
- Brownfields 2019
- 2019 stakeholder listening session and written comments

U.S. Environmental Protection Agency



28

28

Guidance on State and Local Government Acquisitions



Goal – guidance for EPA employees; assistance to state and local governments

- Clarifies EPA's enforcement intentions to help address potential Superfund liability concerns
 - Addresses methods of governmental acquisitions not explicitly included in Section 101(20)(D) exemption
 - Addresses issues related to governmental acquisitions not explicitly included in Section 101(20)(D) exemption
- Provides local governments with an overview of Superfund's liability framework and protections and the potentially applicable EPA enforcement discretion policies

U.S. Environmental Protection Agency

29

29

Guidance on State and Local Government Acquisitions



Acquisition methods and issues not addressed by Section 101(20)(D) exemption

- "By virtue of function as sovereign"
- Acquisitions by purchase, inheritance, bequest, gift, donation escheat, or eminent domain
- Transfers between units of government
- Activities or omissions that may cause or contribute to the release or threatened release of a hazardous substance
- Land banks, redevelopment authorities, and other quasi-governmental entities
- Additional methods identified by stakeholders and other EPA guidance

U.S. Environmental Protection Agency

30

30

Guidance on State and Local Government Acquisitions



Acquisition "by virtue of function as sovereign"

- EPA enforcement discretion when a unit of state or local government acquires title to the property through the exercise of a:
 - Uniquely governmental authority (*i.e.*, use of a mechanism only available to a government) and
 - Function that is unique to its status as a governmental body (*i.e.*, pursuant to a function that can only be effectively performed by a government)

U.S. Environmental Protection Agency

31

31

Guidance on State and Local Government Acquisitions



Acquisitions by purchase, inheritance, bequest, gift or donation

- No EPA enforcement discretion because these acquisition methods are not "by virtue of function as sovereign"
- These acquisition methods are available to private parties and are not through the exercise of uniquely governmental authorities exercising governmental functions
- Alternatives protections may be available for a party that qualifies as a bona fide prospective purchaser or innocent landowner

U.S. Environmental Protection Agency

32

32

Guidance on State and Local Government Acquisitions



Transfers between units of government

- Enforcement discretion for governmental transferee if:
 - Satisfies "by virtue of function as sovereign" analysis
 - Transferor and transferee have not caused or contributed to a release or threatened release and are not otherwise potentially liable under CERCLA
- Example – city/county acquires title of tax delinquent property through tax lien foreclosure and transfers it via quit claim deed to another local government entity
- Additional protections may be available for a party that qualifies as a bona fide prospective purchaser or innocent landowner

U.S. Environmental Protection Agency

33

33

Guidance on State and Local Government Acquisitions



Escheat

- 1995 EPA policy treats escheat as "by virtue of function as sovereign" acquisition
- Additional protections may be available for a party that qualifies as a bona fide prospective purchaser or innocent landowner

U.S. Environmental Protection Agency

34

34

Guidance on State and Local Government Acquisitions



Eminent Domain

- Enforcement discretion for eminent domain as "by virtue of function as sovereign" acquisition if for a public purpose but not if primarily benefits private entities
- Examples – parks, recreation, and civic buildings and areas to serve the general public; mass transit, infrastructure, and utility projects to serve the general public; and projects to address a threat to public health, safety, and the environment
- Additional protections may be available for a party that qualifies as a bona fide prospective purchaser or innocent landowner

U.S. Environmental Protection Agency

35

35

Guidance on State and Local Government Acquisitions



Limitation of the Section 101(20)(D) Exemption

- Exemption is not available to state or local government that caused or contributed to the release or threatened release of a hazardous substance from the property
- Some actions or omissions during government ownership of a property can cause or contribute to a release of hazardous substances and void the liability exemption
- Examples of acts or omissions – dispersing contaminated soil during excavation and grading; failing to prevent the release of hazardous substances
- See EPA *Common Elements Guidance* discussion on disposals
- Alternative protection may be available for a party that qualifies as a bona fide prospective purchaser

U.S. Environmental Protection Agency

36

36

Guidance on State and Local Government Acquisitions



"Unit of state or local government"

- Not defined in Superfund statute
- EPA enforcement discretion on definition of "unit of state or local government"
 - Apply broad definition of "local government" found in Grant Regulations
 - Include redevelopment authorities, land banks, and community development agencies

U.S. Environmental Protection Agency

37

37

Guidance on State and Local Government Acquisitions



Summary of other CERCLA liability protections for local governments

- Third party defense and innocent landowners – Sections 107(b)(3) and 101(35)(A)
- Bona fide prospective purchasers – Sections 101(40) and 107(r)
- Enforcement bar for cleanups under a state cleanup program – Section 128(b)
- Rendering care and emergency response – Section 107(d)
- Municipal solid waste – Section 107(p)

U.S. Environmental Protection Agency

38

38

Guidance on State and Local Government Acquisitions



Potential CERCLA Liability Protections for Local Governments	Methods of Property Acquisition								
	Tax Lien, Delinquency and Bankruptcy	Escheat	Eminent Domain	Transfer	Purchase	Inheritance or Bequest	Abandonment	Gift/Donation	
State and Local Government Acquisitions § 101(20)(D)	●	●	●	●	●		●		
Bona Fide Prospective Purchasers §§ 101(40) and 107(r)(1)	●	●	●	●	●	●	●	●	
Third Parties and Innocent Landowners §§ 107(b)(3) and 101(35)(A)			●	●		●			

39

39

Third-Party Defense



- Section 107(b) provides a defense to liability to a party that can demonstrate that contamination was caused solely by the acts or omissions of a third party
 - Act or omission must not occur “in connection with a contractual relationship” between the parties
- Party asserting the defense must:
 - Exercise due care with respect to the contamination
 - Take precautions against the third party’s foreseeable acts or omissions and the consequences that could foreseeably result

U.S. Environmental Protection Agency

40

40



Innocent Landowner Defense

- Section 101(35)(A) provides an innocent landowner defense may be available to a local government when:
 - It establishes the third-party defense;
 - It acquires contaminated property;
 - Without knowledge of contamination after performing all appropriate inquiries or
 - By escheat, involuntary transfers or acquisition, eminent domain, or inheritance;
 - All disposal occurred prior to acquisition;
 - It complies with land use restrictions and does not impeding institutional controls;
 - It takes "reasonable steps" to prevent the release of hazardous substances; and
 - It provides full cooperation, assistance, and access.

U.S. Environmental Protection Agency

41

41



Bona Fide Prospective Purchaser Liability Protection

BFPPs – CERCLA Sections 107(r) and 101(40)

- A person (or tenant of a person) that acquires ownership after 1/11/02
- Disposal occurred prior to purchase
- Can purchase with knowledge of contamination
- BFPP property potentially subject to a "windfall lien" where the federal government has been involved in a response action at the site
 - Generally, EPA will only perfect windfall lien where the response action took place during the BFPP's ownership
 - Lien is lesser of government's unrecovered costs or increase in fair market value attributable to EPA's cleanup

U.S. Environmental Protection Agency

42

42

Common Elements / Continuing Obligations



Threshold Criteria

- Perform "All Appropriate Inquiries" into previous ownership and uses of property before acquisition
- Have no affiliation with person potentially liable for response costs

Continuing Obligations

- Demonstrate no disposal of hazardous substances after acquisition
- Comply with land use restrictions and do not impede the effectiveness or integrity of institutional controls
- Take "reasonable steps" with respect to hazardous substances affecting the landowner's property
- Provide cooperation, assistance, and access
- Comply with information requests and administrative subpoenas
- Provide legally required notices

U.S. Environmental Protection Agency

43

43

2019 EPA Common Elements Guidance



Core enforcement document that deals with the self-implementing landowner liability protections of the 2002 Brownfields Amendments

- Bona Fide Prospective Purchaser (BFPP)
- Contiguous Property Owner (CPO)
- Innocent Landowner (ILO)

Product of Superfund Task Force Goal 3, Strategy 3, to "optimize tools and realign incentives to encourage third-party investment," and to "support the cleanup and reuse of contaminated sites"

- Recommendation 29 – Revise "Common Elements" based on case law developments and lessons learned by EPA and the private sector

U.S. Environmental Protection Agency

44

44

Common Elements – Attachment A



Attachment A
Chart Summarizing Applicability of "Common Elements" and Other Requirements to Bona Fide Prospective Purchasers, Contiguous Property Owners, and Section 101(2)(5)(A)(i) Innocent Landowners

Common Elements and other Requirements	Bona Fide Prospective Purchaser Can acquire with knowledge of contamination	Contiguous Property Owner Cannot acquire with knowledge of contamination	Innocent Landowner Section 101(2)(5)(A)(i) Cannot acquire with knowledge of contamination
Threshold Criteria			
Perform All Appropriate Investigations	✓ 101(40)(B)(i)	✓ 107(q)(1)(A)(vii)	✓ 101(2)(5)(A)(i)(B)(i)
"No Affiliative" demonstration	✓ 101(40)(B)(viii)	✓ 107(q)(1)(A)(viii)	See supra note 23, at 7
Acquisition after January 11, 2002	✓ 101(40)(A)(i)(D)		
Continuing Obligations			
No disposal after acquisition	✓ 101(40)(B)(i)		✓ 101(2)(5)(A)
Compliance with land use restrictions and not impeding institutional controls	✓ 101(40)(B)(v)	✓ 107(q)(1)(A)(x)	✓ 101(2)(5)(A)
Taking "reasonable steps" to manage releases	✓ Practice appropriate care 101(40)(B)(ii)	✓ 107(q)(1)(A)(iii)	✓ 101(2)(5)(B)(i)(D)
Providing full cooperation/assistance/access	✓ 101(40)(B)(v)	✓ 107(q)(1)(A)(v)	✓ 101(2)(5)(A)
Compliance with information requests and administrative subpoenas	✓ 101(40)(B)(vii)	✓ 107(q)(1)(A)(vi)	See supra note 89, at 21
Providing legally required notices	✓ 101(40)(B)(iii)	✓ 107(q)(1)(A)(vii)	See supra note 90, at 21
No impeding performance of response action or natural resource restoration	✓ 107(i)(1)		
Did not cause/contribute to contamination		✓ 107(q)(1)(A)(x)	
Third-Party Defense requirements (due care and precautions)			✓ 107(b)(3)

All section citations in this table are to the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. Chap. 103, §§ 9601-9607. Visit the [EPA website for current versions of the United States Code](https://www.epa.gov/ceq/compensation-and-liability).

U.S. Environmental Protection Agency

45

45

Common Elements – Updates/Revisions



Appropriate Care/Reasonable Steps

- Provide better clarity on reasonable steps obligations to reflect congressional intent/EPA practices and update reasonable steps section and Reasonable Steps Attachment with case law
- "Reasonable Steps Categories and Examples" - Identifies/outlines main categories of "reasonable steps" obligations described by courts and recommended in finalized EPA comfort/status letters

Land Use Restrictions/Institutional Controls

- Update to provide better clarity to landowners on meeting these requirements; language from more recent guidance documents incorporated into this section

Disposal After Acquisition

- New section; provides guidance by describing illustrative examples of situations that could warrant exercise of EPA enforcement discretion; harmonizes requirement to take "reasonable steps" to manage "releases" with no "disposal" after acquisition requirement

U.S. Environmental Protection Agency

46

46

Revised Common Elements Guidance



Revised: July 29, 2019
(Originally released March 2003)

Intended Audience: EPA enforcement personnel

www.epa.gov/enforcement/common-elements-guidance



U.S. Environmental Protection Agency

47

47

Site-Specific Enforcement Revitalization Tools



- Comfort Letters, especially the local government model
- Agreements with non-PRPs: PPAs and BFPPAs
- Local government case studies / success stories using our tools

U.S. Environmental Protection Agency

48

48

Comfort / Status Letters



- Provide information that EPA may have about a specific property and information about the cleanup progress and potentially applicable statutory provisions.
- The “comfort” comes from hearing directly from the Agency, near the time of the property transaction.
- EPA Regions often receive requests for comfort/status letters from developers, purchasers, local governments, agents, lenders, environmental firms, or attorneys.
- Comfort letters are valuable redevelopment tools that can help quickly facilitate redevelopment at a site.
- EPA has been issuing comfort letters since 1996 Policy.
- The 2019 Comfort/Status Letter Policy superseded 2015 Policy.
- www.epa.gov/enforcement/comfortstatus-letters-guidance

U.S. Environmental Protection Agency

49

49

Comfort / Status Letters: Current Models



- "Federal Superfund Interest Letter"
- "No Current Federal Superfund Interest Letter"
- "No Previous Federal Superfund Interest Letter"
- "State Action Letter"

U.S. Environmental Protection Agency

50

50



Comfort / Status Letters: Pending Models & Updates

- Property Status Letter
- RE-Power Comfort/Status Letter
- Local Government Comfort/Status Letter
- HUD Comfort/Status Letter
- Updated Language in the 2019 Comfort Letter Model

U.S. Environmental Protection Agency

51

51



Case Study: Graveyard Auto (Clarksville, IN)

- EPA comfort/status letter to assist the Town's Redevelopment Commission following the acquisition of a tax delinquent contaminated property previously used as an auto scrap yard.
- Letter addressed available Superfund liability protections and reasonable steps to maintain BFPP status and prevent future liability.
- Town is working with a non-profit to develop the site and surrounding properties into 500-acre park connecting existing greenways along Ohio River.



U.S. Environmental Protection Agency

52

52



Agreements with Non-PRPs

- Sites of Federal Interest
- Did not cause or contribute to contamination
- Intends to acquire, lease, or develop a site of federal interest
- Wants liability protections:
 - Covenant Not to Sue (CNTS)
 - Contribution protection
- Willing to perform CERCLA work and/or pay response costs

U.S. Environmental Protection Agency

53

53



Prospective Purchaser Agreement (PPA)

- Purchaser not a PRP at time of agreement since not a current owner/operator
- Section 101(40) obligations built into agreement where appropriate
- Existing Contamination and Work/Payment CNTS in exchange for work and/or payment
- Payments may be deposited into a special account
- Provides for oversight of any work by EPA
- Provides contribution protection
- Updated PPA Model in development

U.S. Environmental Protection Agency

54

54

Bona Fide Prospective Purchaser Agreement (BFPPA)



- BFPP representation in agreement
- Existing Contamination and Work CNTS in exchange for work beyond BFPP obligations
- Oversight payments deposited into Trust Fund
- Provides contribution protection
- May update BFPPA Removal Model in future for use where appropriate

U.S. Environmental Protection Agency

55

55

Comparing PPAs and BFPPAs



	Prospective Purchaser Agreements	Bonafide Prospective Purchaser Agreements
Statutory Protection?	No*	Yes
Available if Property Already Owned?	No	Yes
Section 101(40) Requirements	As many as possible	All

U.S. Environmental Protection Agency

56

56

PPAs and BFPPAs with Local Governments



- EPA seeing increased interest from local governments to become parties to PPAs/BFPPAs.
- Circumstances include when cleanup obligations remain, private development has stalled, and when a PPA/BFPPA can facilitate a multi-party settlement of cleanup claims at the property.
- These agreements have leveraged the unique ability of local governments to achieve site-specific goals of the Superfund cleanup and enforcement programs.
- As a result, PPAs/BFPPAs with local governments have successfully facilitated needed property transactions, settlements with PRPs, implementation of PRP settlements, and continued protection of constructed remedies.

U.S. Environmental Protection Agency

57

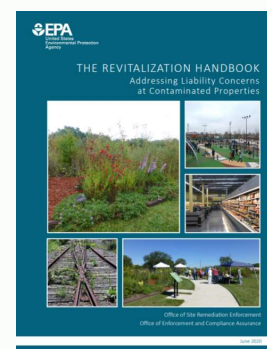
57

Reference Materials



Key EPA documents and tools addressing property acquisitions and CERCLA liability include:

- [Revitalization Handbook](#) (2020)
- [Common Elements Guidance](#) (2019)
- [Comfort/Status Letter Policy and Models](#) (2019)
- [Policy on Third-Party Agreements](#) (2018)



Visit EPA's [Addressing Liability Concerns to Support Cleanup and Land Reuse website](#) for additional information addressing liability concerns.

U.S. Environmental Protection Agency

58

58

Contact Information



Matt Sander

Attorney Advisor
EPA Office of Site Remediation
Enforcement
(202) 564-7233
sander.matthew@epa.gov

Victor Zertuche

Attorney Advisor
EPA Office of Site Remediation
Enforcement
(202) 564-4212
zertuche.victor@epa.gov

U.S. Environmental Protection Agency

59

59

Questions?



Frank Avvisato, Bill Denman, Matt Sander, and Victor Zertuche

60