NOTE: This checklist is intended as a tool, listing tasks which may be assigned or performed during PRP searches, depending on site enforcement strategy and needs. The list which follows does not imply that all tasks must or should be performed, and the sequence in which tasks are performed should be governed by site strategy rather than the order listed below.

Region: _____ Site Name: ____________________________________________
Location: _______________________________________________________

## TASK
## TASK SELECTION CRITERIA / CONDITIONS

### 1. Agency Record Collection and File Review
Gather and organize the information; review records to extract PRP information and leads

<table>
<thead>
<tr>
<th>Files are:</th>
<th>File Location</th>
<th># of Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Federal</td>
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<tr>
<td>☐ State</td>
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<td>☐ Local</td>
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<tr>
<td>☐ Other</td>
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</tbody>
</table>

Use this space to describe anything unique about the records and their condition including business confidential, contamination, travel involved, access, other sources besides hard copy, etc.

### 2. Title Searches  
**Note:** Guidelines such as going back 50 years or to the end of World War II or the first industrial use of the property can sometimes be useful, but in most cases determining the relevant period for a search is a highly site-specific exercise.

#### A. Simple Title Search
Site involves less than five parcels and the site does not have a long history of industrial use.

#### B. Complex Title Search
Site involves more than five parcels and/or has a long history of industrial use.

#### C. Unknown Title Search
A site property description will need to be developed by EPA, or EPA’s enforcement contractor along with an estimate of the title search cost.

#### D. Title Search for Recorded Instruments
Includes deeds, leases, mortgages, liens, plate maps, contracts. Necessary to support site history and PRP list. If litigation is expected, certified copies (see next task) are usually required for admissibility.

#### E. Certified Copies
Includes deeds, leases, mortgages, liens, death records, wills, lawsuits and contracts. Obtain certified copies if litigation is expected and case attorney requires certified copies for court admissibility.

#### F. Chain of Title
A chronological list of title instruments for quick reference to title transactions over time.

#### G. Property History Narrative
Requested for more complex sites when a detailed narrative description of property history would assist case development.
<table>
<thead>
<tr>
<th>TASK</th>
<th>TASK SELECTION CRITERIA / CONDITIONS</th>
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<tbody>
<tr>
<td>3.</td>
<td>Interviews with Government Officials</td>
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<td>Interviews required of persons known or suspected to possess unique information about the site. Interviews generally conducted by phone unless travel is specifically requested. This task is used in most PRP searches.</td>
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<td>4.</td>
<td>Records Compilation</td>
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<td>Records are located and manually organized to permit easy access and use. A file system and index are usually established. Depending on the number of records, records may be computerized.</td>
</tr>
<tr>
<td>5.</td>
<td>Compliance History</td>
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<td>This task provides a narrative description of site compliance status for a specified period of interest focusing on activities and parties involved with hazardous wastes.</td>
</tr>
<tr>
<td>6.</td>
<td>PRP Status/PRP History</td>
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<tr>
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<td>PRPs for which a current address is not available are researched to determine their fate. Names, addresses, and registered agents are provided for the PRPs and any successor companies.</td>
</tr>
<tr>
<td>7.</td>
<td>PRP Name and Address Update</td>
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<tr>
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<td>Current name and address information is obtained for identified PRPs. Includes name, address, registered agent, mergers, and name changes.</td>
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<tr>
<td>8.</td>
<td>CERCLA 104 (e) Letters</td>
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<tr>
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<td>EPA identifies PRPs and collects evidence by sending section 104(e) information request letters. The information gathered from 104(e) letters is critical to site history, status, chemical use, disposal, volume, and other information to determine liability.</td>
</tr>
<tr>
<td>9.</td>
<td>Financial Status</td>
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<tr>
<td></td>
<td>Solicit financial information through CERCLA 104(e) authority regarding the financial condition of the PRPs. This task can provide PRP information such as financial status, officers, and current business operations.</td>
</tr>
</tbody>
</table>

**Develop financial information for:** (Identify public vs. private companies, etc.)

A. | Individual PRPs | Attach list of names and addresses |
B. | Partnership | Attach list of names and addresses |
C. | Corporation | Attach list of names and addresses |
D. | Exempt Organizations | Attach list of names and addresses |
E. | Other | Attach list of names and addresses |
F. | CERCLA 104(e)/ RCRA 3007(c) Letters | This task includes formulating potential questions for PRPs based on gaps observed in available information, preparing letters with PRP names and addresses, and reviewing responses for information relevant to PRPs. |

10. | History of Site Operations |
<p>|     | Note: This task may be more appropriately performed after issuance of information request 104(e) letters and the review of PRP files. A narrative description of site operations through a specified period of interest is presented in a report. This history focuses on activities and parties involved with hazardous wastes. Particularly useful if many operators or various types of operations were involved at the site. |</p>
<table>
<thead>
<tr>
<th>TASK</th>
<th>TASK SELECTION CRITERIA / CONDITIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>11.</td>
<td>Report Preparation</td>
</tr>
<tr>
<td>12.</td>
<td>Aerial Photographs and Sanborn Maps</td>
</tr>
<tr>
<td>13.</td>
<td>CERCLA Subpoena Authority</td>
</tr>
<tr>
<td>14.</td>
<td>Field Survey</td>
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<tr>
<td>15.</td>
<td>Industrial Survey</td>
</tr>
<tr>
<td>16.</td>
<td>PRP File Review</td>
</tr>
</tbody>
</table>

Use this space to describe anything unique about the records and their condition including business confidential, contamination, travel involved, access, other sources besides hard copy, etc.

17. Private Citizen/PRP Interview | Interviews with persons known or suspected to possess unique information about the site. Interviews can be conducted via telephone, or in person at the discretion of the investigator and/or enforcement specialist. Detailed interviews, when needed, can be documented by a transcript. |
18. EPA Investigations | Investigations can be useful in locating individuals, developing information regarding closely held financial assets, and interviewing parties with knowledge of the site activities. If a potential for danger exists, contact appropriate law enforcement personnel, such as EPA CID special agents, building security, or local police. |
19. CERCLIS | CERCLIS is an EPA database which generally contains PRP information such as: name, addresses, types of letters sent (notice, demand and information request) and the dates sent, orders issued, and kind of PRP (owner, operator, generator, or transporter). |
<table>
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<tr>
<th>TASK</th>
<th>TASK SELECTION CRITERIA / CONDITIONS</th>
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<tbody>
<tr>
<td>20.</td>
<td>Waste Stream Inventory. Compile an accurate inventory of wastes that were disposed of at the site by reviewing operating logbooks, analytical reports, and waste stream records.</td>
</tr>
<tr>
<td>21.</td>
<td>Process Chemistry Analysis. The process chemistry analysis task is generally performed after an industrial survey and a waste stream inventory. This task attempts to link industries with wastes at a site.</td>
</tr>
<tr>
<td>22.</td>
<td>Database(s)</td>
</tr>
<tr>
<td>A.</td>
<td>Correspondence. A database is created to keep track of PRPs sent letters (Notice or Information), whether they responded, and other information as specified by EPA. Computerized databases should be considered for cases with a large number of PRPs.</td>
</tr>
<tr>
<td>B.</td>
<td>Inventory. Information management system developed to organize and permit quick retrieval of documents by key word, author, date, subject, or other predetermined strategy. Useful for searches with a large number of documents or if documents must be easily accessed.</td>
</tr>
<tr>
<td>C.</td>
<td>Transactional. Site transaction databases are used to rank PRPs based on quantified site usage information. (See also Generator Ranking)</td>
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<tr>
<td>23.</td>
<td>Financial Assessment. This task provides a more detailed analysis of a PRP’s financial situation than the financial status task.</td>
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<tr>
<td>24.</td>
<td>Generator Ranking. This is usually a work product (printout) from a transactional database project (see #22 above). The ranking orders generators by waste volume or other comparable unit.</td>
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<td>25.</td>
<td>Property Appraisal/Property Survey. Appraisal of site property owned by a PRP which may have value. Appraisal may focus on contaminated state or post-remedial state.</td>
</tr>
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</table>

Please identify person completing this checklist:

Name: ______________________  Title: ______________________
Region/Other: __________________ Phone Number: ________________
Mailing Address: ___________________________________________
CHECKLIST FOR REMOVAL/PRE-REMEDIAL SITES

Completion of this form is not mandatory, nor is it directed solely towards a specific type of responder. The first on-site responder may begin the checklist which may include contributions from any of the following: EPA site assessment manager (SAM), on-scene coordinator (OSC), civil investigator (CI), remedial project manager (RPM), EPA contractor, state staff, or state contractor. This form should be filled out for future use by EPA or state staff in preservation of evidence related to the identification of potentially responsible parties. This form may be filled out at any point during the site discovery, assessment/investigation, or response phase.

It may not be possible to provide information for each of the items on this form but, providing information on as many of the items as possible will improve the overall efficiency of the site remediation and enforcement processes. When you have completed it to the extent feasible, please distribute copies of this form to the appropriate EPA and state personnel (e.g., civil investigators, EPA or state attorney, OSC, RPM, etc.), and place the original in the site file.

1. Potential Site referred:
   Region: _____  Site Name: __________________________________________
   Location: _______________________________________________________

2. Referred by:
   Department/Agency: ____________________________  Contact Name: ____________________________  Phone #: ____________________________
   ☐ State
   ☐ National Response Center
   ☐ Other: _______________________________________________________

3. Basic site information was requested to be submitted to the regional office from the above referral contact:
   ☐ Yes  ☐ No

4. Identification of person completing this checklist:
   Organization: ____________________________  Name: ____________________________
   Title: ____________________________  Phone #: ____________________________
   Mailing Address: ____________________________

5. The OSC (or other First Responder) determines the urgency of the situation at the site, assessing the factual information referred against the criteria set forth in the National Contingency Plan.

6. Site Team formed, OSC, Attorney, Enforcement Specialist, Civil Investigator, Site Assessment Manager, Remedial Project Manager, EPA contractor, State staff, etc.
7. Site Team reviews information to ascertain responsible corporate officers, registered agents, and principal environmental and/or health and safety contacts. Some examples of information to be reviewed and their source is:

- U.S. EPA media files (NPDES permits, RCRA information, EPCRA releases, CAA permits)
- State media files
- Local health department files
- Historical society information/historical photos
- Newspaper archives
- Local university archives
- Sanborn fire insurance maps
- Other

8. Obtain access agreement(s) with last known owner(s) of site property:

- Yes
- No

Date obtained:

9. Identification of the property to be visited:

- Copy of deed
- Address:
- Plat #:
- Cross Street Location:

10. Identification of possible contacts that may be a source of information in the future, including complete names, titles, addresses, and telephone numbers. Include all people you encounter on the site, and anyone volunteering information about the site: [*Owners/operators, prior owners/operators, generators, transporters, local authorities, state and other federal agencies, local libraries, other*

<table>
<thead>
<tr>
<th>Association With Site and Number of Years*</th>
<th>Contact Name</th>
<th>Address</th>
<th>Phone No.</th>
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</table>
11. Interviews were conducted with the following contacts:

<table>
<thead>
<tr>
<th>Interviewee</th>
<th>Association With Site and Number of Years</th>
<th>Date Interview Conducted</th>
<th>Interviewer</th>
<th>Transcript Available Yes/No</th>
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12. Information about records located onsite:

<table>
<thead>
<tr>
<th>Type of Records *</th>
<th>Location of Records</th>
<th>Condition of Records**</th>
<th>Name of Person in Possession of Records</th>
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<tbody>
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*Types of records, to include but not limited to: log books, driver’s tickets, utility bills, payroll records, letterheads, or other specific correspondence or records.

**Please identify if: contaminated, damaged, poor quality, good quality, other
13. **Are there file cabinets on site?**

<table>
<thead>
<tr>
<th>Number of File Cabinets</th>
<th>Location of File Cabinets</th>
<th>Condition of Cabinets/Files</th>
</tr>
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14. **Were photographs taken?** [Note: photographs should conform to accepted photographic record protocol. Refer to TAT, site assessment, and criminal investigators for EPA photographic protocol]

   - [ ] Yes  [ ] No

   Photographs were taken of:
   
   __________________________________________
   __________________________________________
   __________________________________________
   __________________________________________

15. **Were drums found at the Site?**  [ ] Yes  [ ] No

   Number of Drums: ________________
   Number With Labels: ________________

16. **Was sampling done?**  [ ] Yes  [ ] No

17. **Neighbors near the site:**

<table>
<thead>
<tr>
<th>Name</th>
<th>Association With Site and Number of Years</th>
<th>Address</th>
<th>Phone No.</th>
<th>Interviewed and Date Yes/No</th>
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</table>
18. Additional potential sources for gathering site information:

- Neighboring Businesses
- County Recorder:
  - Deed Information
  - Past Tax Information
  - Sidwell Maps
- Financial Information
  - Financial Institutions
  - Accountant Information
  - Commerce Clearing House (CCH) Publications (Capital Transactions)
- PRP Information on EPA Databases
  - CERCLIS
  - IDEA
  - FINDS
  - ERNS
- Electronic Database Review
  - Choice Point
  - Dun & Bradstreet
  - Lexis/Nexis (or Westlaw)
  - Corporate Information
  - Prior lawsuits, bankruptcy filings, SEC filings
  - Internet sources

19. OSC plans for:

- Removal action
- Removal scoping
- Public participation
- Establish administrative record

20. Based on information gathered to date, appropriate enforcement activities should be taken:

- Issue information request
- State an opportunity, in the information request, for the PRPs to provide information on additional PRPs
- Initiate title search
- Review relevant site records
- Initiate PRP search report
- Oral/written general notice letters issued to known PRPs

21. OSC prepares Action Memorandum

- Develop negotiation strategy
- Prepare draft administrative order on consent (AOC)
- Negotiate AOC or issue unilateral administrative order (UAO)

[Note: when issuing UAOs, the enforcement team should follow guidance on Administrative Reforms - the UAO should be issued equitably to the largest manageable number of parties and the team should document the reasons why the UAO is not issued to all PRPs, if appropriate]
22. Site cleanup:
   - PRP-lead
   - Fund-lead

23. Cost recovery phase:
   Complete enforcement investigations:
   - Followup on earlier PRP search
   - Update title search if necessary

   Cost recovery activities:
   - Itemized cost summary
   - Send demand letters
   - Cost recovery referral
   - Close-out memorandum (where appropriate, if case is not referred to DOJ)
   - Cost documentation package
   - Work performed documents

Please use the following space to provide additional noteworthy information regarding this checklist and the site:

__________________________________________

__________________________________________

__________________________________________

__________________________________________

__________________________________________

__________________________________________

PLEASE ATTACH ALL RELEVANT INFORMATION THAT HAS BEEN REFERENCED IN THIS CHECKLIST AND DISTRIBUTE TO THE APPROPRIATE REGIONAL CIVIL INVESTIGATOR, SITE FILE, AND OTHER EPA OR STATE PERSONNEL AS APPROPRIATE.