

## **Fundamentals (3.d): Site Cleanup Enforcement at Cleanup Sites**

*Take quick and effective enforcement actions on cleanup efforts when responsible parties underperform during cleanup projects.*

**Goal:** To improve enforcement actions in the Cleanup Program by monitoring underperforming cleanups more carefully and taking action more quickly and more effectively.

Areas to improve enforcement at cleanup sites include: identifying underperforming sites; establishing criteria to prioritize sites; and clarifying criteria to facilitate action at underperforming sites.

Enforcement and partnership are two critical elements DTSC must exercise when overseeing the cleanup of hazardous waste sites by Responsible Parties (RPs). It is critical that we can move from enforcement to partnership when a RP is willing and capable of site cleanup. Conversely, we must move from partnership to enforcement when a RP cannot perform competently or expeditiously.

### **Timeline:**

#### **May – June 2013**

- Work with the Branch Chiefs to identify all cleanup sites that are underperforming
- Establish a set of criteria to identify the Priority 1 sites where a substantial threat to human health or the environment may exist
- Identify the Priority 1 sites
- Create a Watch List for underperforming sites that are not Priority 1

#### **July – September 2013**

- Implement enforcement action at Priority 1 sites
- Evaluate existing enforcement tools
- Examine the underperforming sites to determine if additional enforcement tools are needed
- Develop training for Cleanup Program Staff on evaluation of underperforming sites, identification of Priority 1 sites, and use enforcement tools to address these sites

#### **October 2013 – March 2014**

- Develop a work plan for development and deployment of additional enforcement tools
- Implement enforcement tools work plan