

Reclamation Manual

Directives and Standards

Checklist 17

Environmental and Disposal Liability (EDL)

Site/Facility: _____

Date: _____

Address: _____

EPA I.D.: _____

Use this checklist to verify accurate reporting of EDL.

EDL Site					
INSPECTION ITEM	CITE	YES	NO	Evidence Y/N	COMMENTS
Are Facility Manager(s) aware of EDL requirements?	ENV P05, Paragraph 5.E.				
Are there processes and procedures in place for identifying and evaluating locations of concern (LOCs) and reporting them to regional EDL Coordinators?	TRMR-68, Paragraph 4.1.1.				
Does the facility have LOCs for which Reclamation is legally responsible or has acknowledged responsibility ¹ for cleanup?	CERCLA, RCRA, OPA, etc.				
Have LOCs undergone "due care" to identify the presence of contamination significant enough to warrant cleanup or further study?	Technical Release 2: <i>Determining Probable and Reasonably Estimable for Environmental Liabilities in the Federal Government</i>				
Have LOCs (sites) where contamination is present and Reclamation is responsible for or has acknowledged cleanup responsibility been posted to the Department's Environmental Management Information System (EMIS) as EDLs?	TRMR-68, Paragraph 4.1.(1)				

¹ Note this does not include sites with identified potential responsible parties that are cleaning up the site or reimbursing the government for cleanup.

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Does the facility have or expect to have a future outflow of resources associated with hazardous waste removal, containment, or disposal at the contaminated sites?	TRMR-68, Paragraph 5.				
Does the liability status in EMIS reflect the state of the project cleanup and the expected outflow of resources (e.g. remote, reasonably possible, probable)?	TRMR-68, Paragraph 5.A.				
For all sites in which the state of liability is probable or reasonably possible, have costs for cleanup been estimated using required methods? ²	TRMR-68, Paragraph 5.B.				
If costs are estimable, have the data fields indicating the source of the costs been marked and has adequate documentation of the costs been uploaded?	TRMR-68, Paragraph 5.B.				
If costs are estimable, what is the date of the estimate and last update (non-inflation-related)?	TRMR-68, Paragraph 5.B.-C.				
If costs are not estimable, has an adequate explanation been provided?	TRMR-68, Paragraph 5.C.				
For sites that are proposed for deactivation or removal, has adequate documentation been uploaded demonstrating the cleanup is complete and/or the site is in O&M mode?	TRMR-68, Paragraph 5.E.				
Are all data fields within EMIS complete and accurate in accordance with the Department requirements? ³	TRMR-68, Paragraph 4.1.1-3.				
EDL Asset					
Is Asbestos data in FBMS Certified Quarterly?	TRMR-68 Paragraph 4.F and 4.G				
If "Survey Conducted" field in FBMS is marked "Y," is a survey report available for review?	TRMR – 68 Paragraph 4.H and FBMS Work Instruction RP_REDBU				

² Please see *Environmental and Disposal Liabilities Identification, Documentation and Reporting Handbook* (v.3.0) (EDL Handbook), issued 2011 by the U.S. Department of Interior at <http://www.doi.gov/pmb/oepec/upload/EDLHandbook.pdf>.

³ In addition to the EDL Handbook, please see the DOI Environmental and Disposal Liability (EDL) Reporting System User Guide at <https://edit.doi.gov/sites/doi.gov/files/uploads/ECL-User-Guide-v2.pdf>.

