**U.S. EPA, REGION 6**

FOR DEMONSTRATION PURPOSES ONLY\*

**MEMORANDUM**

**SUBJECT:** Enforcement First Report (EnFiRep) - Original [or] Update #[X]

 [Name of site]

[Location: City, County, State]

 Site ID# [insert SSID]

**FROM:** Wren Stenger

Technical & Enforcement Branch (6SF-T)

**TO:** [Appropriate Section Chief/Team Leader]

[Branch and mail code]

This memo provides [information on] [an update of] the status of Enforcement First Activities at the [name of site,] including the efforts that have been made and/or will be made to identify potentially responsible parties (PRPs) associated with the site and to compel such PRPs to undertake and/or contribute to investigation and clean-up of the site. The memo further provides the opinion of the Enforcement Assessment Team regarding the issuance of notice, either general or special, to PRPs identified below.

**A. Enforcement Overview**

 [*Briefly describe the enforcement activities completed and whether PRPs were found and recommended action]*

**B. Site Background**

 [P*rovide brief site background including operations, and contaminates found*]

**C. PRP Search Progress and Results to Date.**

 **1.** Describe PRP Search activities that have been completed or are ongoing as of the date of this Report.

 a. 104(e) Information Requests

*i. [Identify all recipients of 104(e) letters to date. Provide brief summary of response from each.]*

[*Identify recipients of planned 104(e) letters, when the letters are planned to be mailed and what information is expected to be obtained.]*

 b. Deed and Title Search

1. *[Describe Deed/Title Search completed. Identify who completed the search, attach a summary of the findings of the Deed/Title Search. ]*
2. *[Describe any additional work planned on the Deed/Title Search and the timing for completing the work.]*

 c. Records Collection

1. *[Describe efforts undertaken to review and collection documents associated with site operations and PRP identification. Include what significant information is contained in each set of documents.]*
2. *[Describe any efforts that are planned to review/copy/take possession of additional documents.]*

 d. Federal Regulation information

 [*indicate whether site is or has been* *subject to regulation under any other EPA program]*

e. Interviews

1. *[Identify individuals interviewed to gain information and include a summary of the information obtained in the interview.]*
2. *[Identify any individuals that are planned to be interviewed and what information is hoped to be obtained.]*

 f. Other

*[Describe any other PRP Search activities that were conducted or are planned to be conducted.]*

**2.** PRPs Identified

*[include description of evidence and how a copy can be obtained.]*

Owner/Operators *[current and previous]*

Generators

Transporters

PRP Financial Viability

*[Describe efforts taken to determine PRPs’ ability to finance or contribute to investigation and/or clean-up. Report results of any financial reviews, etc. Give opinion of PRPs’ financial ability. ]*

 **4.** Future PRP Search Strategy.

 [*Describe in detail efforts underway or planned to identify additional PRPs and/or examine PRPs financial ability. ]*

**D. Notification of PRPs of Potential Liability**

 **1. Notices Sent.**

*[Include date(s) of notices, names and other identifying information, as necessary, of PRPs receiving such notices, kind of notice (i.e., removal, general special,) and results.]*

 **2. Future Notices Planned.**

*[Provide information on whether future notices should to be sent.]*

**E. Potential to be a Superfund Alternative Site**

*[If the PRPs have expressed an interest in conducting response actions (consistent with EPA’s Alternative Superfund Site guidance) to avoid NPL listing, provide information concerning this expression of interest, including the names of the PRPs that have expressed such interest.]*

**F. Expectation for PRP Lead Response**

*[Select one:]*

* **RI/FS expected to be PRP-lead**
* **RI/FS possible PRP-lead, RD/RA expected to be PRP-lead**
* **RI/FS unlikely to be PRP-lead, RD/RA possible PRP-lead**
* **Site response expected to Fund-lead**

*Include rationale for selecting one of the above.*

1. **Mixed Funding Option**

*[Would a mixed funding option provide an incentive for a PRP-lead response? Why?]*

The Enforcement Officer assigned to this site is [X]. If additional information is needed, s/he can be reached at [X].

\*Enforcement First Reports, when completed by the Enforcement staff, are FOIA exempt.