

Model HUD Comfort/Status Letter – Technical Updates

9/30/25

- Throughout
 - Changed font to Calibri per EPA Correspondence Manual
 - Added “the” before “EPA” per EPA Correspondence Manual
- *Header:*
 - Added placeholder for EPA Regional Logo/Header
- *Address line:*
 - Added “**Via electronic mail**”
- *RE: line:*
 - Removed capitalization of “**Insert**” for formatting consistency
 - Added placeholder for parcel identification number
- *Salutation*
 - Removed capitalization of “**Insert**” for formatting consistency
- *Introductory Paragraphs*
 - Deleted “the” before Agency when defining the term
 - Placed “Agency” in quotation marks when defining the term
 - Deleted “(“Development”)” as a defined term for consistency with other model letters
 - Corrected placement of parentheses
 - Replaced parentheses with commas for readability
 - Replaced “project” with “property” for accuracy as suitability for residential use
 - Deleted “(“Development”)” for accuracy and readability
 - Revised discussion of the purpose of the letter for grammatical correctness and readability
 - Replaced “We hope” with “Our intent is that”
 - Replaced “for” with “regarding” for consistency with other model letters
 - Replaced “the federal Comprehensive Environmental Response, Compensation and Liability Act” with “CERCLA,” as the term has already been defined
 - Replaced parentheses with commas for readability
- *Property Status*
 - Moved all discussion of the Superfund Enterprise Management System (SEMS), including site-specific URL, to the end of the section so that the property status is discussed before information on SEMS is provided
 - Corrected placement of brackets
 - Deleted “[is or was] located in SEMS” and corresponding conjunctions so that only status on National Priorities List or under the Superfund Alternative Approach is discussed
 - Replaced “we are” with “the EPA is” for clarity

- Replaced “/” with “or” in “[remedial/removal] authority” for formatting consistency
- Moved “in the Superfund Enterprise Management System (SEMS)” to the beginning of the discussion of SEMS for clarity
- Revised to clarify that SEMS includes information about sites that are, or potentially are, contaminated with hazardous substances, pollutants, or contaminants
- *History and Status of the Site*
 - Moved language related to SEMS to the end of the *Property Status* section so that all discussion of SEMS is in one place
 - Revised note to replace “remedies” with “response actions” to apply to both removal and remedial sites
 - Revised note to remove recommended discussion of reasonable steps in the *History and Status of the Site* section
 - Revised note to replace “land use restrictions and determination, deed restrictions” with broader terms “engineered controls and institutional controls”
- *Reuse of the Property*
 - Corrected formatting of bracketed language
 - Replaced four instances of “[D]evelopment” with “proposed reuse” or “reuse” to accurately reflect the breadth of activities proposed by interested parties
 - Replaced “We” with “the EPA” for clarity
 - Replaced two instances of “remedy” with “response action” to apply to both removal and remedial sites
 - Deleted “(ICs)” as no need to define the term
 - Replaced “[**Note: For example, the EPA Regions could include language that an interested party should**]” with “[**Optional:** You should” for formatting consistency and readability
 - Added “[or federal agency’s]” for consistency with other model letters
 - Added commas for grammatical correctness and readability
 - Added “[and/or the affected federal agency]” for consistency with other model letters
- *CERCLA’s Bona Fide Prospective Purchaser Liability Protection*
 - Replaced “exempt” with “protect” to more accurately reflect the statutory language and the Common Elements Guidance
 - Replaced “buy” with “acquire” and “purchases” with “acquires ownership of” to more accurately reflect the statutory language and its application
 - Replaced “key advantage” with “key element”
 - Replaced “provision” with “statutory protection”
 - Added footnote reference to *All Appropriate Inquiries Final Rule Fact Sheet*
 - Replaced “requirements are explored” with “requirements are explained” throughout

- Replaced “landowner” with “party” to more accurately reflect application of the BFPP protection
- *Note*
 - Capitalized the “state” as a proper term
 - Added “s” to “purpose” for grammatical correctness
 - Replaced semicolons with commas for grammatical correctness and consistency
 - Added period for grammatical correctness
- *Optional: Reasonable Steps*
 - Replaced “the Common Elements Guidance” with “the EPA’s Common Elements Guidance” for clarity
 - Replaced “Exemption” with “protection” to more accurately reflect the statutory language and the Common Elements Guidance
 - Replaced two instances of “landowners” with “parties” to more accurately reflect application of the BFPP protection
 - Added comma for grammatical correctness
 - Replaced “whether” with “regardless of whether” for grammatical correctness
- *Note*
 - Replaced “exemption” with broader term “protection”
- *Liens*
 - Deleted quotation marks around “Site” and “Property” for grammatical correctness, as not defining those terms
 - Deleted “or” for formatting consistency
 - Replaced “Generally, the Agency will not” with “The Agency generally will not file” for grammatical correctness, consistency with other model letters, and readability
 - Added comma for readability
 - Removed capitalization of “Settlement Agreement” as an undefined term
 - Capitalized “property” as a defined term
 - Deleted “aka” for formatting consistency and readability
 - Replaced “Agency” with “EPA Region” for consistency with other model letters
 - Deleted commas around “generally” for grammatical consistency
 - Revised optional language regarding windfall liens to remove redundancies in the options provided and clarify when each option would apply to specific scenarios
- *State Actions*
 - Replaced “We” with “The EPA” for clarity
 - Replaced “[NOTE]” with “[Note]” for formatting consistency
- *Conclusion*
 - Replaced “redevelop” with “reuse” to accurately reflect the breadth of activities proposed by interested parties