

Mr. Phillip T. Cavanaugh  
Vice President and General Manager  
Chevron  
1401 Eye Street, NW. Suite 1200  
Washington, DC 20005

Dear Mr. Cavanaugh:

Thank you very much for the congratulations and for your specific suggestions on improving the corrective action program that you conveyed in your September 26, 2001 letter. Your letter, as well as your participation in past dialogues, reflects the partnership atmosphere we have worked hard at EPA to foster. I am committed to continuing this partnership and, as you suggest, continuing dialogs with industry and other stakeholders.

As for the congratulations, it is you and the Chevron Companies that deserve recognition for the progress you've made toward meeting corrective action goals. According to our data as of October 12, 2001, EPA and the states have documented that both human exposures and the further migration of contaminated groundwater are controlled at six of the Chevron facilities on our baseline. While these two "environmental indicators" do not reflect corrective action completion, they are critical short-term milestones we use to focus both facilities and regulators on achieving meaningful results and improving public confidence. We appreciate your commitment to cleaning up your sites efficiently and safely and urge you to work to meet both of the indicators promptly at your remaining baseline facilities.

In response to your specific suggestions, I agree that EPA needs to provide more finality on corrective action completion. I also support efforts to focus program implementors on achieving results based on reasonably expected end-uses of properties, rather than following any particular step-by-step process. I agree that operating and closing facilities often present different issues, and that EPA should be looking for ways to expedite cleanup where a closing facility is a candidate for redevelopment (including, as appropriate, through state voluntary cleanup and other programs.) These recommendations are consistent with my own goals and will be key messages in our future efforts.

I appreciate your comments on the Corrective Action Management Unit (CAMU) proposal, which we will finalize this year. In developing the proposal, we looked carefully at existing CAMUs, including Chevron's, to make sure we provided sufficient flexibility to accommodate legitimate and protective remedies. I understand your recommendation on the off-site management of remediation waste. As you point out, this issue has been discussed with EPA as a possible addition to the CAMU rule, and we intend to look for flexibility in this area as well.

Thank you again for the congratulations and your suggestions. If you would like to discuss any of these topics in greater detail, I urge you to contact me at 202-260-4610 or have your staff contact Tricia Buzzell, Chief of the Corrective Action Programs Branch in the Office of Solid Waste, at 703/308-8632.

Sincerely yours,

Marianne Lamont Horinko  
Assistant Administrator