

Pre-CERCLA Screening Training Participant Manual July 2017



Pre-CERCLA Screening Course



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Course Objectives

- ◆ **After taking this course, participants will be able to explain:**
 - » What a Pre-CERCLA Screening (PCS) entails
 - » The types of information that should be collected during the PCS
 - » How to document the PCS
 - » How the PCS can inform subsequent decision-making and priority setting



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Instructors

- ◆ Kumud Pyakuryal, EPA Region 7
- ◆ Randy Hippen, EPA OSRTI
- ◆ Jodi McCarty, ICF



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Participant Poll - Affiliation

I work for:

- A. EPA Region**
- B. EPA HQ**
- C. State**
- D. Tribe**
- E. Contractor**



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Participant Poll – Site Assessment Experience

I have the following experience with Superfund site assessment:

- A. Less than 1 year**
- B. 1 to 3 years**
- C. 3 to 5 years**
- D. More than 5 years**



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Participant Poll – Pre-CERCLA Screening Experience

Select the answer that best describes your Pre-CERCLA Screening (PCS) experience:

- A. I have never conducted or reviewed a PCS**
- B. I have conducted a PCS**
- C. I have reviewed and conducted a PCS**
- D. I have reviewed but not conducted a PCS**



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What is Pre-CERCLA Screening?

- ◆ **Low-cost collection and review of existing information for a potential Superfund site**
- ◆ **PCS helps determine whether a site should be addressed by**
 - » Federal Superfund Program, or
 - » Other federal, state or tribal cleanup program
- ◆ **EPA began conducting “Pre-CERCLIS” screening in 1996**
 - » EPA issued guidance in 1996 with revision in 1999
 - » CERCLIS was replaced by SEMS in 2014 and the screening process was renamed from Pre-CERCLIS to Pre-CERCLA Screening

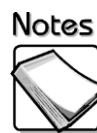
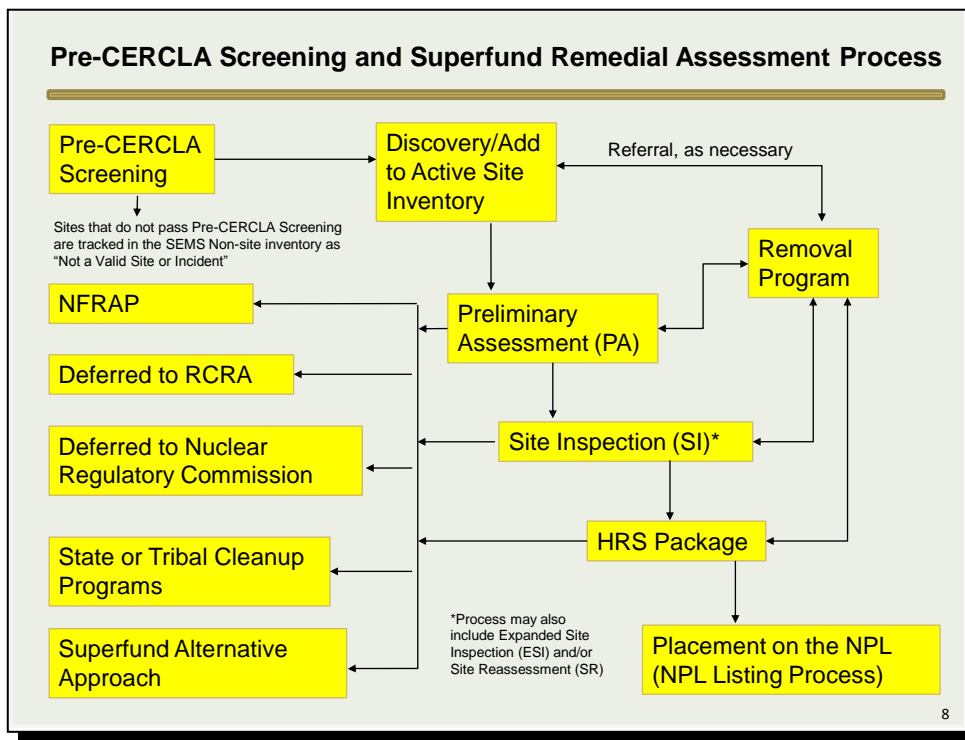


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Notes



- ◆ A PCS is a relatively low-cost initial collection and review of existing information for a potential Superfund site. The PCS helps determine whether the site should be addressed under the federal Superfund program or under another federal, state or tribal cleanup program. A PCS ensures that only sites needing more thorough investigation or possible response under the federal Superfund program are added to the Superfund active site inventory. A PCS also assists EPA, state and tribal program staff in determining next steps at a screened site.
- ◆ EPA began conducting “Pre-CERCLIS” screening in 1996 with issuance of guidance and conduct of several pilot projects. The guidance was revised in 1999. The Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) was officially replaced by the Superfund Enterprise Management System (SEMS) in 2014, thus the change in name from Pre-CERCLIS to Pre-CERCLA screening.

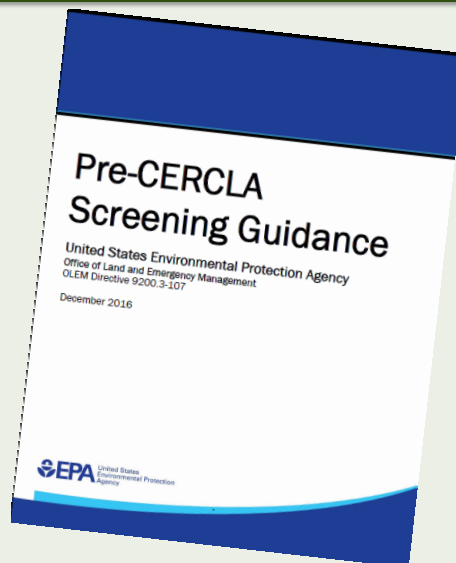


- ◆ This slide depicts, in general, how Pre-CERCLA Screening (PCS) fits in to the overall site assessment process, and how a site may proceed through the assessment process once it is entered into the active site inventory of the Superfund Enterprise Management System (SEMS). Most sites that enter the remedial site assessment process are currently being referred to EPA by states and tribes. In addition, sites may be referred to the remedial program by (1) the removal program, (2) notifications made to the EPA Region by telephone or through the hotline, (3) citizen petitions under CERCLA Section 105(a), and (4) other sources.

Sites with a completed PCS are either added to the active site inventory or the non-site inventory in SEMS. Sites that are added to the active site inventory are required to have at least a preliminary assessment (PA) completed and proceed to either the outcomes listed on the left of the chart (NFRAP, deferred to RCRA, deferred to Nuclear Regulatory Commission, referred to a State or Tribal cleanup program, or determined to be a Superfund Alternative Approach site) or the next step in the assessment process through listing on the NPL. At any time, a site can be referred to the Removal Program for evaluation and possibly action. Sites that are added to the non-site inventory may be referred to State or Tribal cleanup programs but will not be addressed under CERCLA unless new information indicates they should be added to the active site inventory.

Reference for Course

- ◆ **This course is based on EPA's new Pre-CERCLA Screening Guidance**
 - » Supersedes "Improving Site Assessment: Pre-CERCLIS Screening," October 1999
- ◆ **EPA collaborated with Regional staff and state and tribal Superfund staff to develop the new guidance**



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Notes




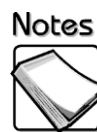
- ◆ This course is based on EPA's new Pre-CERCLA Screening Guidance. The new PCS guidance supersedes all national PCS guidance previously issued by EPA (PCS was formerly known as Pre-CERCLIS Screening.) EPA Regional offices may incorporate additional factors beyond those described in this document. Site assessors should consult EPA's latest version of the Superfund Program Implementation Manual (SPIM) and their EPA Regional point-of-contact (POC) for any updates to information contained in the PCS guidance. The technical notes that accompany the slides are taken directly from the PCS guidance with minor edits to improve readability.
- ◆ Staff from EPA's Office of Superfund Remediation and Technology Innovation (OSRTI) collaborated with EPA Regional, state and tribal Superfund staff to develop the PCS guidance.

PCS Guidance Table of Contents

- ◆ **Body of guidance and Attachment A are discussed in detail**
 - » Attachment A is a fillable PDF form
- ◆ **Attachment B**
 - » Table 1 provides Geospatial Data for page A-2 of checklist
 - » Tables 2 - 6 provide allowable entries for fields on page A-1 of checklist
- ◆ **Attachment C**
 - » Glossary of Terms

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- ◆ The table of contents for the PCS is shown on this slide. The main body of the guidance is discussed in detail during the course, along with Appendix A, PCS Checklist/Decision Form. The PCS Checklist/Decision Form is available as a fillable PDF form. Attachment B includes available values for completing several of the checklist fields. Attachment C provides a glossary of key terms used.

Overview of Pre-CERCLA Screening Guidance

- ◆ Provides factors to consider for conducting Pre-CERCLA Screening (PCS)
- ◆ Provides template for collecting PCS data
- ◆ Supports making a decision on whether to add a site to the active site inventory in SEMS
- ◆ Assists EPA, state and tribal program staff in determining next steps at a screened site
- ◆ Intended audience:
 - » Site assessors for EPA
 - » State and tribal partners



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Notes



- ◆ The PCS guidance contains factors to consider when initiating, conducting and completing Pre-Comprehensive Environmental Response, Compensation and Liability Act Screening (PCS) activities under the federal Superfund program. It also provides a template for collecting PCS data and making a decision on whether to add the site to the active site inventory. A PCS also assists EPA, state and tribal program staff in determining next steps at a screened site. It is intended for site assessors who conduct or manage PCS activities for the U.S. Environmental Protection Agency (EPA) or its state and tribal partners.

PCS Assists Site Assessors In Determining If . . .

- ◆ A release or potential release of a hazardous substance has occurred at a site
- ◆ The site is eligible for further remedial assessment under CERCLA authority
- ◆ The site needs further attention under Superfund or another cleanup program
- ◆ The site warrants entry into the federal Superfund program's active site inventory for further assessment or response



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Notes



- ◆ A PCS is intended to assist site assessors in determining if:
 - » A release or potential release of a hazardous substance has occurred at a site;
 - » The site is eligible for further remedial assessment under CERCLA authority;
 - » The site needs further attention under Superfund or another cleanup program; and
 - » The site warrants entry into the federal Superfund program's active site inventory for further assessment or response.

PCS Can Create Cost Efficiencies By . . .

- ◆ Identifying agency/program leads to prevent duplication of effort
- ◆ Avoiding a more costly PA at sites that do not warrant further assessment
- ◆ Conserving resources for sites that need further assessment
- ◆ Identifying sites needing sampling most quickly
- ◆ Collecting basic information for sites that need a PA or combined PA/SI



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Notes



- ◆ A PCS can create cost efficiencies by:
 - » Identifying agency/program leads to prevent duplication of effort across federal, state and tribal programs;
 - » Avoiding a more costly preliminary assessment (PA) at sites that do not warrant further assessment (the National Oil and Hazardous Substances Pollution Contingency Plan requires completion of a PA at all sites entered into the Superfund Active site inventory for remedial assessment);
 - » Conserving resources for sites that need further federal Superfund remedial assessment;
 - » Identifying sites needing sampling most quickly; and
 - » Collecting basic information (e.g., site location, description) for sites that need a PA or combined PA/site inspection.

Authority

◆ Statutory and regulatory authorities

- » CERCLA Sections 104 and 105
- » NCP 40 CFR Part 300, Subpart E and Appendix A

◆ EPA policy and guidance

- » Superfund Program Implementation Manual (SPIM) generally updated yearly
- » PCS Guidance



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Notes



- ◆ **Statutory and regulatory authorities:** PCS activities are implemented pursuant to statutory authority granted in CERCLA sections 104 and 105. Regulatory authority is provided under the National Oil and Hazardous Substances Pollution Contingency Plan (CFR 40 Part 300, Subpart E and Appendix A).
- ◆ **EPA policy and guidance:** EPA's SPIM is Agency policy covering key Superfund activities, including PCS. The SPIM is generally updated on a yearly basis and may include new or revised PCS requirements (e.g., activity-and document-management requirements).

Participant Roles and Responsibilities

- ◆ **PCS checklist preparer**
- ◆ **Site assessor**
- ◆ **EPA Regional reviewer**
- ◆ **EPA Regional point-of-contact**



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Notes



- ◆ **PCS checklist preparer:** The PCS checklist preparer is responsible for completing the PCS Checklist/Decision Form. He or she may be a federal, state or tribal program employee, or a person acting at their direction (e.g., contractor).
- ◆ **Site assessor:** The site assessor may be the same person as the PCS checklist preparer. He or she is responsible for reviewing the PCS Checklist/Decision Form and any accompanying documents for completeness. The site assessor works with the preparer to address any missing information or other deficiencies, then signs the PCS Checklist/Decision Form and submits it to the EPA Regional reviewer.
- ◆ **EPA Regional reviewer:** The EPA Regional reviewer is an EPA employee who reviews and signs the PCS Checklist/Decision Form as a final document.
- ◆ **EPA Regional point-of-contact:** For purposes of this guidance, the EPA Regional point-of-contact (POC) is generally the EPA employee who serves as the primary interface with a state or tribe that is or will be conducting a PCS.

Participant - Roles

What is your primary role?

- A. PCS checklist preparer**
- B. Site assessor**
- C. EPA Regional reviewer**
- D. EPA Regional point-of-contact**
- E. None of the above**



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PCS Funding Mechanisms

- ◆ Funding state and tribes through site or multi-site assessment cooperative agreements
- ◆ Funding federal contractors
- ◆ Utilizing EPA Regional staff



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Notes



- ◆ PCS activities can be implemented through three primary funding mechanisms:
 - » Funding states and tribes through site or multi-site assessment cooperative agreements;
 - » Funding federal contractors; and
 - » Utilizing EPA Regional staff.

EPA Headquarters provides funding to EPA Regional offices for Superfund site assessment activities through site allowances as described in the SPIM. EPA Regions use these funds to conduct PCS activities. However, Regions need to balance the amount of funds used for PCS activities with remedial assessment funding needs for sites already in the Superfund active site inventory. EPA Regional offices generally specify PCS activities in the statements of work associated with site-assessment cooperative agreements (40 CFR Part 35 Subpart O) and with federal contract work assignments as necessary.

Key Points to Consider When Determining Whether to Proceed with a PCS

- ◆ **Generally apply to non-federal facility sites and those federal facilities not on the federal facilities docket**
- ◆ **Should not be performed for a site already in active or archive inventories**
- ◆ **Should not be performed when site clearly falls under CERCLA statutory exclusions**
- ◆ **Can be performed if new information becomes available for a site with a previously completed PCS but not added to active inventory**



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Notes



- ◆ Key points to consider when determining whether to proceed with a PCS include:
 - » PCS activities generally apply to non-federal facility sites and to those federal facilities that are not placed on the Federal Facilities Hazardous Waste Compliance Docket. Federal Facility sites are generally added to the Federal Facilities Hazardous Waste Compliance Docket and automatically placed in the Superfund Active site inventory for completion of a remedial PA.
 - » A PCS should not be performed for a site that is already included in the Superfund active or archive site inventories. See Section 3.2.2 for information on searching site inventories. An abbreviated PA or site reassessment can be performed to collect PCS-level information for a site in one of these inventories.
 - » A PCS should not be performed when preliminary information clearly indicates the site does not fall within the scope of CERCLA (see FY 2017 SPIM section VI.A.8.a); specifically, when the site falls under a statutory exclusion as described in Section 3.6 of this document.
 - » If new information becomes available for a site that was not added to the Superfund active site inventory based on a previously completed PCS, a second or subsequent PCS can be performed (see FY 2017 SPIM section VI.A.8.a).

Reasons for Conducting a PCS

- ◆ When EPA is notified through phone call or hotline or receives referral
- ◆ In response to CERCLA 105(a) petition
- ◆ When EPA is conducting geographic, sector or broad-based discovery efforts
- ◆ When state or tribe identifies a site or set of sites



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Notes



- ◆ A PCS may be initiated for various reasons, including but not limited to:
 - » When EPA is notified of a potential site through a phone call or hotline, or receives a referral from a state, tribe or other federal agency;
 - » In response to a CERCLA 105(d) petition to conduct a PA. If the site does not pass the screening, the PCS can be used to explain to the petitioner why a PA is not appropriate. If the site passes the screening, completion of a PA is required within one year of the date of the petition;
 - » When EPA is conducting a geographic, sector or other broad-based discovery effort to identify sources of known contamination (a PCS may be conducted at one or many of the potential sites); or
 - » When a state or tribe has identified a site or set of sites warranting a PCS that will be addressed under a site assessment cooperative agreement with EPA.

See FY 2017 SPIM Section VI.A.8.a.

Minimum Requirements to Initiate a PCS

◆ Site location

- » State
- » County
- » City
- » Street address or section township and range
- » Zip Code preferred but not required



◆ Superfund site inventory search

- » Active site inventory
- » Archive site inventory
- » Non-site inventory

◆ Consultation with Regional POC



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Notes



- ◆ **Site location:** The following minimum site location information should be available to avoid diverting resources to tracking down sites that may not exist:
 - » State;
 - » County;
 - » City;
 - » Street address (or section township and range, if no street address is available); and
 - » A ZIP code is preferred, but not required (see FY 2017 SPIM section VI.A.8.a).
- ◆ **Superfund site inventory search:** Search EPA's Superfund site inventories to determine if the site is already in the active, archive or non-site inventory. EPA Regional staff can assist since they have direct access to these inventories. See EPA's Pre-CERCLA Screening web page and/or the EPA Regional POC for information on accessing these site inventories. Site name and location data is commonly used to conduct this search.
 - » If the site is found in the Superfund active or archive site inventory, discuss the site with the EPA Regional POC to determine if further assessment is necessary (e.g., abbreviated PA, site reassessment).

- » If the site is found in the non-site inventory, review existing records in the site file and determine whether an initial or subsequent PCS is warranted.
- » If the site is not found in the active, archive or non-site inventories, then the site is a candidate for a PCS.

Site inventory designations:

- » Active site inventory: Consists of NPL sites and non-NPL sites where site assessment, removal, remedial, enforcement, cost recovery or oversight activities are planned or conducted or are being monitored.
 - » Archive site inventory: Consists of non-NPL sites removed from the active site inventory following completion of all federal Superfund program interest.
 - » Non-site inventory: Contains pre-screened and other sites that did not qualify for inclusion in the active site inventory.
- ◆ **Consultation with regional POC:** State and tribal site assessors are encouraged to check in with their regional POC periodically to stay current on regional requirements for conducting PCS work (e.g., use of a customized PCS checklist).

Notification

- ◆ **Notify EPA, state or tribal POCs when PCS is determined to be necessary**
 - » Minimizes duplication of effort
 - » Transmits relevant site information
- ◆ **Notification should include information that may require additional attention**
- ◆ **Notifications can highlight**
 - » Elevated stakeholder interest
 - » Citizen petition
 - » Known sampling needs
 - » Other site-specific information



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Notes



- ◆ **Notify EPA, state or tribal POC when PCS is determined to be necessary:** Upon determination that a PCS is necessary, site assessors should take reasonable steps to notify their EPA, state or tribal partner POC(s) that a PCS has been or will be started. This step is taken to minimize potential duplication of work and to pass along any relevant site information held by partners that may be helpful to the site assessor. The notification step may be superseded by EPA Regional policy, procedure or practice, so it is important for the site assessor to have a clear understanding of the notification requirements.
- ◆ **The notification should include information that may require additional attention:** Any information about the site that may require additional attention should be included in the notification.
- ◆ **Notifications can highlight:**
 - » Elevated community or other stakeholder interest;
 - » Citizen petition;
 - » Known sampling needs; and
 - » Other site-specific information.

Data Collection

- ◆ **Scope can vary depending on nature of the site**
- ◆ **Collect enough information to complete Pre-CERCLA Screening Checklist/Decision Form**
- ◆ **Include map showing site location and surrounding area**
 - » Inclusion of a map became a requirement in FY2017 per the FY 2017 SPIM
- ◆ **Focus on reviewing existing information and collecting minimal additional information**
- ◆ **Consult with EPA Regional POC, as necessary**



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Notes



- ◆ While the scope of a PCS can vary based on the nature of the site and the PCS's purpose, it should collect enough information to complete the Pre-CERCLA Screening Checklist/Decision Form (Attachment A) or equivalent form. The PCS must also include an area map showing the site location and surrounding area.

In general, data collection should focus on reviewing existing information and collecting minimal additional information to determine whether a site warrants further CERCLA remedial assessment or response, and entry into the Superfund active site inventory.

The site assessor should consult with the EPA Regional POC as necessary to ensure sufficient data will be collected to make an appropriate decision.

Purpose of Consultation with EPA Regional POC and PCS Data Collection

- ◆ **Determine which data sources should be used**
- ◆ **Discuss tasks that may increase the duration or costs beyond national and regional thresholds**
- ◆ **Discuss potential sampling issues to ensure compliance with EPA guidelines, policies and procedures**
- ◆ **Obtain updated PCS Checklist/Decision Form**



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Notes



- ◆ The consultation with the EPA Regional POC should include the following steps:
 - » Determine which data sources should be used to gather site information
 - » Discuss tasks that may increase the duration or costs to complete the PCS activity beyond national or regional thresholds (i.e., time and costs)
 - » If sampling will be conducted, discuss sampling issues to ensure compliance with EPA operational guidelines for field activities and any other applicable regional policies and procedures

Information collection can be halted when the site assessor learns after the PCS has been initiated that the site matches an existing site in the active, archive or non-site inventory or is otherwise ineligible for PCS activities. Information collected up to this point should be discussed with the EPA Regional POC to determine next steps.

The Pre-CERCLA Screening Checklist/Decision Form (Attachment A) is subject to change as the needs of the Superfund program evolve over time. The site assessor should consult with the EPA Regional POC as necessary to ensure data collection supports the data required for the current version of the PCS checklist/decision form.

Example PCS Data Collection Activities

- ◆ Database searches
- ◆ Review of relevant files
- ◆ Limited PRP identification and searches
- ◆ Obtaining site access
- ◆ Site reconnaissance visits



Continued . . .



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Example PCS Data Collection Activities

- ◆ Interview with property owner-operators
- ◆ Review and discussion of exposure pathways and targets
- ◆ GIS analysis
- ◆ Sampling
- ◆ Other tasks needed to make decision



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PCS Sampling Considerations

- ◆ **Confirm release**
- ◆ **Identify sources**
- ◆ **Identify targets**
- ◆ **Determine if exposure pathways result in actual contamination of targets**
- ◆ **Validate existing data**
- ◆ **Assist in determining if site qualifies for further remedial assessment**
- ◆ **Use of field screening methods and field analytical tools is allowed**

Sampling is subject to EPA operational guidelines for field activities



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Notes



- ◆ Sampling includes targeted or limited sampling, with or without the use of the contract laboratory program (refer to regional guidance), to:
 - » Confirm a release;
 - » Identify sources;
 - » Identify targets;
 - » Determine if exposure pathways result in actual contamination of targets;
 - » Validate existing data;
 - » Assist in determining if the site qualifies for further remedial assessment.
 - » Field screening methods and field analytical tools can be used to collect PCS samples (e.g., passive soil gas surveys for sites with volatile contaminants, X-ray fluorescence screening for metals).

Sampling is subject to EPA operational guidelines for field activities and any other applicable regional policies and procedures.

OLEM 9385.1-117 Attachment A: Pre-CERCLA Screening Checklist/Decision Form February 2017

This form is used in conjunction with a site map and any additional information required by the EPA Region to document completion of a Pre-CERCLA Screening (PCS). The form includes a decision on whether a site should be added to the Superfund program's active site inventory for further investigation. Select from available dropdown values for fields marked with an asterisk *.

Region: State/Territory: Tribe: Click here for the EPA Tribe Entity Mapping spreadsheet. EPA ID No. (if Available)

Site Name: _____
 Other Site Name(s): _____
 Site Location: _____
(Street)

Congressional District: _____
(City) (County) (State / Terr) (Zip+4)

If no street address is available _____
(Township-Range) (Section)

Checklist Preparer: _____
(Name / Title) (Date)

(Organization) (Phone)

(Street) (Email)

(City) (County) (State / Terr) (Zip+4)

Site Contact Info/Mailing Address: _____

CERCLA 105(d) Petition for Preliminary Assessment? If Yes, Petition Date (mm/dd/yyyy): _____
 RCRA Subtitle C Site Status: Is site in RCRAInfo? If Yes, RCRAInfo Handler ID #: _____
 Ownership Type*: _____ Additional RCRAInfo ID #(s): _____
 Site Type*: _____ State ID #(s): _____
 Site Sub-Type*: _____ Other ID #(s): _____

Federal Facility? Federal Facility Owner*: _____
 Formerly Used Defense Site (FUDS)? Federal Facility Operator*: _____
 Federal Facility Docket? If Yes, FF Docket Listing Date (mm/dd/yyyy): _____
 Federal Facility Docket Reporting Mechanism*: _____

Native American Interest? If Yes, list Tribe: _____
 Additional Tribe (s): _____

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Page 1 of checklist

Location Info

Preparer Info

Site Type Info
 Tables 2 – 6 of
 Appendix B

Notes



- ◆ **CERCLA 105(d) Petitions for Preliminary Assessment:** The checklist preparer should consult with the EPA regional POC to learn if and when EPA received a PA petition on a site.
- ◆ **RCRAInfo Handler ID:** If a RCRAInfo Handler ID number is entered on the PCS form at a site not currently tracked in SEMS, the RCRAInfo Handler ID number should generally be used as the EPA ID number when the site record is created in SEMS.
- ◆ **Native American Interest:** The PDF screen fillable version of the PCS checklist includes a link to EPA's Tribe Entity Mapping data. The link opens a spreadsheet showing a current list of Tribes and should be used when entering the Tribe name on the checklist.

OLEM 9395.1.117
February 2017

Attachment A: Pre-CERCLA Screening Checklist/Decision Form

Site Description

Use this section to briefly describe site background and conditions if known or (easily) available, such as: operational history; physical setting and land use; site surface description; soils, geology and hydrogeology; source and waste characteristics; hazardous substances/contaminants of concern; historical releases; previous investigations and cleanup activities; previous regulatory actions, including permitting and enforcement actions; institutional controls; and community interest.

Insert text here (if text exceeds size of text box, view all text on page 5):

Geospatial Information

Latitude: + _____ Decimal Degree North (e.g., +38.859156) Longitude: - _____ Decimal Degree West (e.g., -77.036783)

Provide 4 significant digits at a minimum, more if your collection method generates them.

Except for certain territories in the Pacific Ocean, all sites in U.S. states and territories are located within the northern and western hemispheres and will have a positive latitude sign and negative longitude sign. The coordinate signs should be changed as necessary for sites in the southern and/or eastern hemispheres.

Point Description: Select the option below that best represents the site point for future reference and to distinguish it from any nearby sites.

Geocoded (address-matched) Site Address
Site Entrance (approximate center of curb-cut)
Approximate Center of Site
Other Distinguishing Site Feature (briefly describe below): _____

Point Collection Method: Check the method used to collect the coordinates above and enter the date of collection.

Online Map Interpolation
GPS (handheld, smartphone, other device or technology with accuracy range < 25 meters)
GPS Other (accuracy range is ≥ 25 meters or unspecified)
Address Matching: Urban
Address Matching: Rural
Other Method: _____

Collection Date (mm/dd/yyyy): _____

POINT-SELECTION CONSIDERATIONS

- Often the best point is a feature associated with the environmental release or that identifies the site visually.
- Use the curb cut of the entrance to the site if there is a clear primary entrance and it is a good identifier for the overall location.
- The approximate center of the site (a guess at the centroid) is useful for large-area sites or where there are no appropriate distinguishing features.
- Use the geocoded address if that is the only or best option available, but if possible use something more representative for sites larger than 50 acres.

PRE-CERCLA SCREENING GUIDANCE
A-2

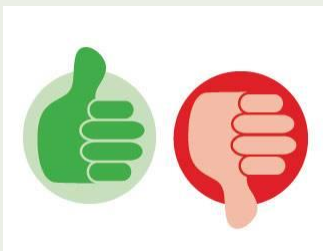
Page 2 of checklist

Narrative Description
If the text exceeds the size of the box all the text shifts to Page 5

Geospatial Info
Table 1 of Appendix B

PCS Decision-Making Criteria

- ◆ **Criteria assist in recommending next steps for a site**
- ◆ **Application of criteria leads to one of following determinations**
 - » Add the site to the Superfund active site inventory for further remedial/integrated assessment or response
 - » Do not add the site to the Superfund active site inventory



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Notes



- ◆ The PCS decision-criteria are embodied by the twelve questions in the PCS checklist/decision form and will assist the site assessor in recommending next steps for a site that receives a PCS.
- ◆ Based on this recommendation and its supporting documentation, the EPA POC will make one of the following determinations:
 - » Add the site to the Superfund active site inventory for further remedial/integrated assessment or response; or
 - » Do not add the site to the Superfund active site inventory.

Define the Acronyms

- Speak the language

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Participant Poll – Can You Define the Acronyms? Fill in the Blank

A. CERCLA

Comprehensive Environmental _____,
Compensation, and Liability Act

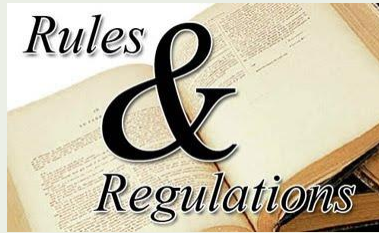


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Participant Poll – Can You Define the Acronym?
Fill in the Blank

◆ NCP

National Oil and _____ Substances Pollution
Contingency Plan



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Participant Poll – Can You Define the Acronym?
Fill in the Blank

◆ PA/SI

Preliminary Assessment/Site _____



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Participant Poll – Can You Define the Acronym?
Fill in the Blank

◆ SPIM

Superfund Program _____ Manual



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Participant Poll – Can You Define the Acronym?
Fill in the Blank

◆ SEMS

Superfund _____ Management System



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PCS Checklist/Decision Form Questions

- 12 Questions

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Attachment A: Pre-CERCLA Screening Checklist/Decision Form			
Complete this checklist to determine if a site should be added to the Superfund Active site inventory. See Section 3.6 of the PCS guidance for additional information.	YES	NO	Unknown
1. An initial search for the site in EPA's Superfund active, archive and non-site inventories should be performed prior to starting a PCS. Is this a new site that does not already exist in these site inventories?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is there evidence of an actual release or a potential to release?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are there possible targets that could be impacted by a release of contamination at the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is there documentation indicating that a target has been exposed to a hazardous substance released from the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Is the release of a naturally occurring substance in its unaltered form, or is it altered solely through naturally occurring processes or phenomena, from a location where it is naturally found?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Is the release from products which are part of the structure of, and result in exposure within, residential buildings or business or community structures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. If there has been a release into a public or private drinking water supply, is it due to deterioration of the system through ordinary use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Are the hazardous substances possibly released at the site, or is the release itself, excluded from being addressed under CERCLA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Is the site being addressed under RCRA corrective action or by the Nuclear Regulatory Commission?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Is another federal, state, tribe or local government environmental cleanup program other than site assessment actively involved with the site (e.g. state voluntary cleanup program)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Is there sufficient documentation or evidence that demonstrates there is no likelihood of a significant release that could cause adverse environmental or human health impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Are there other site-specific situations or factors that warrant further CERCLA remedial/integrated assessment or response?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



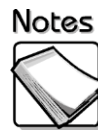
- ◆ This slide presents Page 3 of the PCS checklist/decision form. This page of the form contains the PCS decision-criteria in the form of questions the preparer must answer.

Superfund Site Inventory Search

1. **An initial search for the site in EPA's active, archive and non-site inventories must be performed prior to starting a PCS. Is this a new site that does not already exist in these site inventories?**



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- ◆ Subsequent data collection may determine if the site is in one of these inventories under the same or different site name. Refer to the Section 3.2 Superfund Site Inventory Search in the PCS guidance for further information.

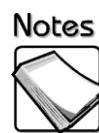
Release and Targets Information

2. Is there evidence of an actual release or a potential to release?

- » Use best professional judgment based on site-specific conditions



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- ◆ This is a professional judgment conclusion based on site-specific conditions indicating that a hazardous substance has likely been or will be released to the environment.

Release and Targets Information

3. Are there possible targets that could be impacted?

Examples include:

- › Populations of people
- › Drinking water wells
- › Drinking water surface intakes
- › Municipal wells
- › Fisheries
- › Sensitive environments



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Notes



- ◆ This includes the presence of people, physical resources such as drinking water wells or surface water intakes, and environmental resources such as sensitive environments or fisheries that may be threatened by release of a hazardous substance from the site.

Release and Targets Information

4. Is there documentation indicating that a target has been exposed to a hazardous substance released from the site?

- » Existing information documented in a file
- » Data from samples collected during the PCS



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Notes



- ◆ Documentation includes both information already collected and documented in a file and data from samples collected during the PCS.

CERCLA Statutory Exclusions

5. Is the release of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring process or phenomena, from a location where it is naturally found?

» Example: Naturally occurring asbestos



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Notes



CERCLA statutorily excludes certain releases (CERCLA section 101 (22)), hazardous substances (CERCLA section 101 (14)), and pollutants and contaminants (CERCLA section 101 (33)). Sites may not be eligible for further Superfund assessment if all associated releases and potential releases meet the criteria described in questions 5-8 of the PCS checklist/decision form.

- ◆ CERCLA section 104(a)(3)(A) limits response to a release or threat of release of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.
 - » An example of a substance that might cause a Yes response to Question 5 could be naturally occurring asbestos.

Participant Poll

◆ **What is another example of a naturally occurring substance that may be subject to the CERCLA exclusion and can enter buildings from the subsurface?**

- A. Radon
- B. Gas from a landfill
- C. TCE from groundwater
- D. None of the above



CERCLA Statutory Exclusions

6. Is the release from products which are part of the structure of, and result in exposure within, residential buildings or business or community structures?

- » Regularly occupied structures such as schools, recreational centers
- » Example: Friable asbestos release within a school



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Notes



- ◆ The structures referenced in Question 5 include regularly occupied structures. Examples of community structures include schools and recreational centers. An example of a release in these structures may include friable asbestos.

CERCLA Statutory Exclusions

7. If there has been a release into a public or private drinking water supply, is it due to deterioration of the system through ordinary use?

- » Any raw or finished water source that is or may be used by a public water system or as drinking water by one or more individuals



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Notes



- ◆ The term "drinking water supply" means any raw or finished water source that is or may be used by a public water system (as defined in the Safe Drinking Water Act) or as drinking water by one or more individuals.

CERCLA Statutory Exclusions

8. Are the hazardous substances possibly released at the site, or is the release itself, excluded from being addressed under CERCLA?

- » Hazardous substance exclusion
 - › Petroleum exclusion
- » Release exclusions
 - › Atomic Energy Act and Uranium Mill Tailing Radiation Control Act sites
 - › Normal application of fertilizer



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Notes



For sites involving CERCLA statutory exclusions, the EPA Regional POC should notify the appropriate program authority for possible follow-up.

- ◆ **Hazardous substances:** CERCLA section 101 (14) specifies that a “hazardous substance” does not include petroleum (including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance), natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

A release or threatened release involving solely crude oil, fractions of crude oil, or refined crude oil products (e.g., gasoline) is not eligible for CERCLA response action. However, release of a CERCLA hazardous substance under section 101 (14) (e.g., lead, polychlorinated biphenyls or PCBs) mixed with oil through either the addition of the hazardous substance to the oil (e.g., oil-based paint, transformer coolant), or as a result of the use of the oil (e.g., waste oil containing lead as a result of combustion) may be subject to CERCLA. In addition, if a CERCLA hazardous substance and oil are commingled to the extent that they cannot be practicably separated, the entire mixture may be subject to CERCLA response authority.

Site assessors are encouraged to contact the EPA Regional POC should there be substances at a site that may be covered under the CERCLA petroleum exclusion.

- ◆ **Releases:** CERCLA section 101 (22) precludes Superfund response actions at sites that fall under the jurisdiction of the Atomic Energy Act (AEA) and the Uranium Mill Tailings Radiation Control Act (UMTRCA). Releases of source, by-product, or special nuclear material defined in AEA Section 68, Statute 923 (e.g., process ore for fresh uranium fuel) from a nuclear incident subject to the financial protection requirements of AEA are excluded from CERCLA response. Typically, this means releases from nuclear power plants licensed by the Nuclear Regulatory Commission (NRC) are the responsibility of NRC (not including facilities licensed by states or other federal agencies that have been granted licensing authority by NRC). Releases of source, by-product, or special nuclear material from processing sites specifically designated in UMTRCA are excluded from CERCLA response. However, PCS work can be conducted at uranium sites under various circumstances. Site assessors should consult with the EPA Regional POC as necessary if CERCLA eligibility is unclear.

In addition, CERCLA Section 101 (22) specifically excludes the normal application of fertilizer from the definition of release.

U.S. EPA Policy Considerations

9. Is the site being addressed under RCRA Corrective or by the Nuclear Regulatory Commission?

- » Sites should not be placed on the NPL if they can be addressed under RCRA Subtitle C corrective action authorities unless corrective action is unlikely to succeed or occur promptly
- » Sites with releases of source, by-product, or special nuclear material from any facility with a current license issued by the NRC are not included on the NPL – however, there may be exceptions



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Notes



- ◆ A site being addressed under RCRA Corrective Action or Nuclear Regulatory Commission authority should not be added to the active site inventory unless information shows the site may still be eligible for inclusion on the NPL. The site assessor and/or EPA POC should search other current EPA data sets (e.g., Envirofacts and RCRAInfo) using site identification data (name and location) to determine whether the site is already being addressed by other authorities.

Sites that fall under the either exclusions or policies may warrant further remedial assessment under CERCLA (e.g., sites with comingled contamination from multiple facilities, or sites where oversight or management may be more effective under CERCLA).

- » **RCRA Corrective Action:** The NPL/RCRA deferral policy states that sites should not be placed on the NPL if they can be addressed under Resource Conservation and Recovery Act (RCRA) Subtitle C corrective action authorities. However, according to the NPL/RCRA policies published June 10, 1986 (51 FR 21057), June 24, 1988 (53 FR 23978, 23981), and October 4, 1989 (54 FR 41000), facilities that are subject to RCRA Subtitle C may be listed on the NPL when corrective action is unlikely to succeed or occur promptly.

Typical situations when releases from facilities subject to RCRA Subtitle C may be listed on the NPL:

1. Inability to finance cleanup (as evidenced by the invocation of bankruptcy laws).

2. Loss of authorization to operate and for which there are additional indications that the owner or operator will be unwilling to undertake corrective action.
3. Clear history of unwillingness to undertake corrective action — case-by-case determination.
4. Converters and non-or late filers.
5. Protective filers (facilities that have filed a RCRA Part A permit application as a precautionary method only).
6. Pre-HSWA permittees where there was no owner/operator consent to reissue permits that include corrective action requirements.

Site assessors are encouraged to contact the EPA Regional POC for any site that may be subject to RCRA Subtitle C corrective action.

- » **Nuclear Regulatory Commission:** It is EPA's policy not to include sites on the NPL where releases of source, by-product, or special nuclear material from any facility with a current license issued by the Nuclear Regulatory Commission (NRC) because the NRC has full authority to require cleanup of releases from such facilities. However, there may be exceptions. Site assessors should consult with the EPA Regional POC as necessary if CERCLA eligibility is unclear. If a facility is licensed by the NRC, but the NRC does not have authority to require cleanup, NPL inclusion may be appropriate.

U.S. EPA Policy Considerations

10. Is another federal, state, tribal or local government environmental cleanup program other than site assessment actively involved with the site (for example, state voluntary cleanup program)?

- » Sites being addressed under another program and that do not require further involvement by the federal Superfund program may be excluded from the Superfund active site inventory



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Notes



- ◆ EPA policy allows assessed sites to be referred to other federal, state, tribal or local government environmental cleanup programs. Based on available information, sites that are being addressed under one of these programs and do not require further involvement by the federal Superfund program may be excluded from the Superfund active site inventory.

Other Site Factors

11. Is there sufficient documentation or evidence that demonstrates there is no likelihood of a significant release that could cause adverse environmental or human health impacts?

- » Sufficient documentation includes:
 - › Completed removal action addressing all sources and releases with documentation of no remaining contamination
 - › Documentation showing no occurrences of hazardous substance releases
 - › Comprehensive remedial investigation or equivalent data showing no release above ARARs
 - › A completed EPA-approved risk assessment showing no risk



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Notes



- ◆ Sites may warrant exclusion from the Superfund active site inventory if there is sufficient documentation clearly demonstrating no likelihood of a release that could cause significant adverse environmental or human health impacts. Examples of sufficient documentation may include, but are not limited to:
 - » A completed removal action of all sources and releases with documentation of no remaining contamination due to the site release;
 - » Documentation showing no occurrences of hazardous substance releases;
 - » A comprehensive remedial investigation or equivalent data showing no release above applicable or relevant and appropriate requirements (ARARs);
or
 - » A completed EPA-approved risk assessment showing no risk.

Participant Poll

◆ Pick the description below that best describes the “sufficient documentation” requirement in Question 11.

A.



“piece of cake”

B.



“low bar”

C.



“high bar”

Other Site Factors

12. Are there other site-specific situations or factors that warrant further CERCLA remedial/integrated assessment or response?

- » Other information that may be useful
 - › Sites potentially impacting sensitive subpopulations such as children and the elderly
 - › Sites where ATSDR recommends immediate dissociation of the population from the site



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Notes



- ◆ This question is used to document other site-specific information that may be useful in deciding whether a site should be added to the Superfund active site inventory. Examples of situations could include sites potentially impacting sensitive subpopulations such as children and the elderly, and sites with an Agency for Toxic Substances and Disease Registry (ATSDR) recommendation for immediate dissociation of a population from a site.

Reporting

◆ Minimum reporting requirements

- » Completed Pre-CERCLA Screening Checklist/Decision Form
- » Recommendation on whether to add site to active site inventory
- » Area map showing site location and surrounding area

◆ Consult with EPA Regional POC

- » PCS format
- » Transmittal procedures



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Notes



- ◆ **Minimum reporting requirements:** Information collected is used to prepare a draft PCS report. At a minimum, the draft PCS report must include the following:
 - » A completed Pre-CERCLA Screening Checklist/Decision Form (Attachment A) or equivalent document. If an equivalent document is used, it should address the information requested in Attachment A.
 - » The draft PCS document includes a recommendation on whether to add the site to the Superfund active site inventory.
 - » An area map showing the site location and surrounding area.
- ◆ **Consult with EPA Regional POC:** The site assessor should consult with the EPA Regional POC to determine the PCS format and the method of transmitting to EPA the draft document and any related attachments.

Review and Approval Process

◆ Review:

- » EPA Regional POC reviews and works with preparer to address any missing information or other deficiencies

◆ Approval:

- » PCS becomes final after designated EPA Regional POC signs and dates the document

Approved!



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Notes



- ◆ **Review:** The EPA Regional POC reviews the draft PCS document for completeness, works with the preparer to address any missing information or other deficiencies, and makes a final decision on whether to add the site to the Superfund active site inventory.
- ◆ **Approval:** The PCS document becomes final after the designated EPA Regional POC signs and dates the document and completes the approval process established within each EPA region.

Communication

- ◆ EPA Regional offices notify appropriate staff from state and interested tribes of final PCS document decisions per the SPIM
- ◆ EPA Regional offices provide copies of final PCS documents to appropriate states and interested tribes



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Notes



- ◆ EPA Regional offices notify the appropriate staff from state and interested tribes of the final PCS document decisions in accordance with the SPIM. Additional communication should be performed if EPA makes a final decision contrary to the state's or tribe's recommendation, which is only expected to happen on rare occasions.
- ◆ EPA Regional offices provide copies of final PCS documents to appropriate states and interested tribes.

Information Management

- ◆ EPA will include PCS document as a record in its document management system
- ◆ EPA tracks key information about PCS documents in SEMS



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Notes



- ◆ EPA will include the PCS document as a record in its document management system for accountability and future reference.
- ◆ EPA also tracks key information about PCS documents in its Superfund database, including sites that are not entered into the Superfund active site inventory. Information on sites not entered into the active site inventory is maintained in the Superfund non-site inventory for accountability and for future reference.

The EPA Regional POC should consult the SPIM to determine:

- » If any additional record-keeping policies or procedures apply to PCS documents.
- » The current national requirements for entering data into the Superfund database.

More Information

◆ U.S. EPA's Pre-CERCLA Screening Web Page

<https://www.epa.gov/superfund/superfund-site-assessment-process-pre-cerclis-screening>

◆ SPIM

www.epa.gov/superfund



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Notes



- ◆ **U.S. EPA's Pre-CERCLA Screening Web Page:** The web page located at <https://www.epa.gov/superfund/superfund-site-assessment-process-pre-cerclis-screening> includes PCS guidance, examples and points of contact for questions relating to PCS activities. Since web page locations may change over time, the current web page address for Pre-CERCLA Screening information will be included in EPA's Superfund Program Implementation Manual (see below).
- ◆ **Superfund Program Implementation Manual:** *The Superfund Program Implementation Manual (SPIM) provides overarching program management priorities, procedures and practices for the Superfund remedial, removal, enforcement, and federal facilities programs, providing the link between the Government Performance and Results Act (GPRA), EPA's Strategic Plan, and Superfund program internal processes. The SPIM is generally updated each year and includes a chapter on remedial site assessment activities. This chapter includes a section on PCS activities. EPA will update this section when PCS process changes occur. Current and previous versions of the SPIM are located on the federal Superfund website (www.epa.gov/superfund).*

Questions

