

US EPA ARCHIVE DOCUMENT



Module 3:

Discovery, Notification, and Initial Site Assessment



Module Overview

- ◆ Module Objective: Examine how releases are discovered and assessed to determine if a response is warranted
- ◆ Topics:
 - » Reporting requirements and reportable quantities
 - » Other methods of discovering releases
 - » Reporting process and National Response Center
 - » Site assessments performed under CERCLA and the NCP
 - » Hazard Ranking System and the National Priorities List
 - » Data management

Reporting Requirements and Reportable Quantities

- ◆ CERCLA, EPCRA, and CWA/OPA establish reporting requirements and penalties for failure to report
- ◆ Reportable quantities (RQ)
 - » Established for hazardous substances (40 CFR Part 302) and extremely hazardous substances (40 CFR Part 355)
 - » Serve as a trigger for informing government of a release
 - » Do not necessarily represent any harm
- ◆ Oil sheen rule under CW/OPA (40 CFR part 110)
 - » Serve as a trigger for reporting oil discharge into navigable waters of the U.S.

Other Methods of Discovering a Release

- ◆ Inspections by Federal or state authorities
- ◆ Inventory or survey projects
- ◆ Complaints from citizens
- ◆ Media



Reporting Process and the National Response Center (NRC)

- ◆ Releases are reported to the NRC
- ◆ Reports may be filed online
- ◆ If the NRC cannot be reached, the EPA Regional office or the USCG may receive reports

Initial Response

- ◆ NRC relays information to predesignated OSC
- ◆ State is notified
- ◆ Site assessment is performed to evaluate if a response is necessary
- ◆ Different types of assessments may be conducted



Site Assessments Performed Under CERCLA and the NCP

PURPOSE	DATA NEEDS
PA/SI (Removal and Remedial Programs)	
Determine if site will qualify for NPL Screen out sites Refer sites to other programs	Contaminant type and quantity Migration pathways - air, soil, surface water and groundwater Targets - human and environmental
RSE (Removal Program)	
Identify source, nature, and magnitude of threat Determine need for removal action	Contaminant source, type, and quantity Conditions related to removal factors (threat) - explosivity, flammability, containers, weather, human exposure potential, etc.

Hazard Ranking System (HRS)

- ◆ Is the principle mechanism used to place sites on the NPL
- ◆ Uses a structured approach to score sites
- ◆ Scores four pathways:
 - » Groundwater migration
 - » Surface water migration
 - » Soil exposure
 - » Air migration

National Priorities List (NPL)

- ◆ Required by CERCLA; primarily an information and management tool
- ◆ Mechanisms used to place sites on NPL:
 - » HRS
 - » State designation
 - » Other criteria established by EPA and ATSDR
- ◆ Requires a rulemaking
 - » Updated annually
- ◆ Superfund Alternative Sites

EPA's Site Assessment Program

- ◆ Includes staff from EPA HQ and Regional offices
- ◆ Initiatives and pilot information
 - » Integrated assessments
 - » Pre-CERCLIS screening
 - » Presumptive site assessments

Data Management

- ◆ ERNS database
- ◆ CERCLIS database
 - » Computerized inventory of Superfund hazardous waste sites
 - » Tracking system for sites in the Superfund program

In Review

- ◆ CERCLA, OPA and EPCRA establish requirements for identifying and reporting releases at hazardous waste sites
- ◆ EPA discovers new sites through inspections, survey projects, complaints from citizens, or the media
- ◆ Releases are reported to the NRC, EPA regional offices, or the USCG
- ◆ Following discovery, EPA performs an assessment to evaluate the extent of the release and determine an appropriate response
- ◆ EPA maintains computerized inventories of reported releases and CERCLA sites in the Superfund program