



Improving Site Assessment: Abbreviated Preliminary Assessments

Office of Emergency and Remedial Response
Site Assessment Team

Quick Reference Guidance Series

ABSTRACT

This guidance document establishes the minimum requirements for conducting an Abbreviated Preliminary Assessment (APA) instead of a full Preliminary Assessment (PA). The PA process determines and documents whether Superfund action is needed at a Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) site. The region may produce an APA report at any phase of the PA (prior to completing a full PA) when enough information is available to make a decision on further CERCLA action. This guidance document supersedes section 4.4 of the *Guidance for Performing Preliminary Assessments under CERCLA*, Publication 9345.0-01A, September 1991.

BACKGROUND

This modified PA approach combines results of pilot projects and past experience using the existing PA process. EPA regions have found that they can often determine a site's location in the Superfund site screening process and whether it should be removed from the process altogether, with less information than is required for a conventional PA. In these early decision instances, you may produce an APA report in place of a full PA report.

This approach uses the same information as the conventional PA approach, but relies on your professional judgment and past site assessment experience to make decisions about a site at earlier stages of the PA process. Responsibility and funding for APAs are the same as for conventional PAs.

WHAT IS THE PURPOSE OF AN APA?

The PA is the first step you take to determine whether a site warrants Superfund response after a site has been entered into CERCLIS. The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR 300.420) requires the lead agency (EPA in most instances) to perform PAs on all sites in CERCLIS to:

- Eliminate those sites that do not pose a threat to public health or the environment from further consideration;
- Determine if there is a need for removal action;
- Set priorities for SIs; and
- Gather data to facilitate later evaluation of the release through the Hazard Ranking System (HRS).

If you can meet these PA objectives without performing a full PA, you may perform an APA. In the case of a citizen petition (see CERCLA 105(d)), the NCP requires the lead agency to either complete a PA or provide an explanation to the petitioner of why the assessment is not appropriate. A brief APA report with a completed *Abbreviated Preliminary Assessment Checklist* (see Attachment A), or equivalent documentation, meets all the CERCLA and NCP requirements for a PA.

There are three typical situations in which you could perform an APA instead of a full PA to increase efficiency and shorten the PA process:

- (1) A site has been unnecessarily listed in CERCLIS either because it is not eligible or because it could be deferred to another response program.
- (2) Available information allows EPA to make an early decision to undertake a combined PA/SI, an SI, or another Superfund investigation.
- (3) A No Further Remedial Action Planned (NFRAP) decision can be made without completing a full PA.

In each situation, an APA can save resources and reduce costs by eliminating unnecessary efforts. Federal Agencies and States conducting CERCLA site assessments should consult with the EPA Regional Office prior to initiating an APA to ensure that sufficient data will be collected to make an appropriate decision about the site.

WHAT ARE THE THREE PHASES OF THE PRELIMINARY ASSESSMENT PROCESS?

You may produce an APA report during any phase of the PA process prior to completing a full PA. Note that an APA must meet the basic PA criteria specified in the NCP.

The first phase, the CERCLA eligibility evaluation, involves collecting and reviewing readily available file information and reinvestigating the site's CERCLA eligibility. Collecting this information may begin before the site is entered into CERCLIS, as part of pre-CERCLIS screening assessment (see document titled *Improving Site Assessment: Pre-CERCLIS Screening Assessments*¹).

The second phase is the initial site evaluation which entails gathering information through file searches. This may involve visiting the site to determine the appropriate action. If you decide to take no further action, you should complete an APA report. An APA report may also be completed if you decide to move straight to an SI without completing a full PA.

You complete the third phase of this PA process if you have insufficient information to make an early decision about future Superfund response. In this case, you should complete a full PA to get the information needed to make a decision about future Superfund action at the site. Perform full PAs in accordance with the *Guidance for Performing Preliminary Assessments Under CERCLA*².

WHAT ARE THE POSSIBLE DECISIONS?

You could make one of the following decisions, based on results of an APA:

- NFRAP under Superfund;
- Defer the site to another Federal program with investigation, enforcement or remediation authority (e.g., RCRA, NRC);
- Delay the decision until State/Tribal program ends active involvement in response activities;
- Assign high priority for further assessment;
- Assign low priority for further assessment;
- Refer to the removal program; or
- Incorporate this site into an existing CERCLIS site.

See the Superfund Program Implementation Manual (SPIM) for more information on making decisions.

HOW IS A CERCLA ELIGIBILITY EVALUATION PERFORMED?

In the first phase of the PA process, you will determine whether the site is eligible for evaluation under CERCLA. Criteria for determining this are identified below (from guidance document titled *Improving Site Assessment: Pre-CERCLIS Screening Assessments*¹). If a pre-CERCLIS screening has been completed using these criteria, this phase of the PA process is unnecessary.

Gather enough data to address the screening criteria below, to help make a CERCLIS eligibility decision. These criteria are primarily based on OSWER Directive # 9200.4-05.

A site should not be entered into CERCLIS if:

- The site is currently in CERCLIS, or has been removed from CERCLIS and no new data warrant CERCLIS entry. Determine whether the site has previously been evaluated under the Federal Superfund Program to avoid entering a duplicate site record into CERCLIS. Check CERCLIS and archive data for previous entries of a site using site name, location, and site identification number data.
- The site and some contaminants are subject to certain limitations based on definitions in CERCLA. This includes cases where the release is:
 - (1) 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;

- (2) From products that are part of the structure of, and result in exposure within, a residential building or business or community structure; or
- (3) Into a public or private drinking water supply due to deterioration of the system through ordinary use.

- A State or Tribal remediation program is involved in response at a site that is in the process of a final clean-up (e.g., a State Superfund program, State voluntary clean-up program, and State or local Brownfields programs).

During the screening process, a file search of other Agency programs eliminates sites where other programs are actively involved. Based on the search of the geographical location of the site and the site name, conduct the search using current databases or telephone calls to staff of other potentially involved programs. You, in consultation with State and Tribal program representatives, are responsible for determining whether another program is actively involved with the site.

When another program with sufficient investigation, enforcement, and remediation resources is actively involved with a site, postpone a decision on CERCLIS entry until all actions have been completed. EPA is responsible for determining if the actions are sufficient and will then determine whether any further Superfund involvement is warranted.

- The hazardous substance release at the site is regulated under a statutory exclusion (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or covered by the Nuclear Regulatory Commission (NRC), and Uranium Mill Tailings Radiation Control Act (UMTRCA)). See CERCLA Section 101(22).
- The hazardous substance release at the site is deferred by policy considerations (e.g., RCRA Corrective Action). Refer to the *Regional QC Guidance for NPL Candidate Sites*³ for more examples.

The site investigator should, at a minimum, search other current EPA data sets using site identification data (name and location) to determine whether the site is already being addressed by other authorities.

The NPL/RCRA deferral policy states that sites should not be placed on the NPL if they can be addressed under 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), 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, as in the following situations: (1) inability to finance, (2) unwillingness/loss of authorization to operate, (3) unwillingness/case-by-case determination, (4) converters, non- or late filers, (5) pre-HSWA (Hazardous and Solid Waste Amendments) permittees, and (6) when not all of the release from the facility is covered by RCRA corrective action.

- Site data are insufficient to determine CERCLIS entry (i.e., based on potentially unreliable sources or with no information to support the presence of hazardous substances or CERCLA-eligible pollutants and contaminants).

If you are presented with an incomplete checklist, or a checklist with what appears to be unreliable data, you should identify the data deficiencies and forward these data needs to the site investigator for further data collection. For more information, see the Pre-CERCLIS Screening Assessment Checklist/Decision Form in the guidance document titled *Improving Site Assessment: Pre-CERCLIS Screening Assessments*¹. When it is not feasible to obtain all the information to complete the checklist, use professional judgement when deciding to place a site in CERCLIS.

- There is sufficient documentation that clearly demonstrates that there is no potential for a release that could cause adverse environmental or human health impacts (e.g., comprehensive remedial investigation equivalent data showing no release above applicable or relevant and appropriate requirements (ARARs), completed removal action of all sources and releases, documentation showing that no hazardous substance releases have occurred, or a completed EPA approved risk assessment showing no risk).

If the answer is “yes” to any of these items and there is no other Federal Superfund interest, you may assign the site a NFRAP designation or defer it to another program. This decision should be documented in a brief

APA report (reporting requirements are described below). This action terminated the PA process. If the answer is “no” to any of the bulleted items, you may proceed to the next phase of the PA process, the initial site evaluation.

HOW IS THE INITIAL SITE EVALUATION PERFORMED?

The initial site evaluation is the phase in which site investigators collect and review information on the site and its surroundings. EPA investigators may use their professional judgment with site-specific information to make recommendations about further CERCLA action.

Exhibit 1 identifies different types of site information and provides some possible recommendations for further site assessment activities based on that information. You should use Exhibit 1, or equivalent information, in determining the need for further action at the site, based on the answers to the questions in Attachment A.

Exhibit 1 and Part 2 of Attachment A present a series of site conditions that indicate whether further Superfund action may be necessary. These site conditions are based on HRS factors and include characteristics that commonly cause sites to receive high or low HRS scores.

WHAT ARE THE REPORTING REQUIREMENTS FOR THE PA PROCESS?

When a full PA is unnecessary, you should develop an APA report to document the rationale for the decision. The NCP (40 CFR 300.420) specifies PA requirements, and an APA report must meet these requirements. The NCP states that the lead agency may complete the preliminary assessment form, or its equivalent, and prepare a PA report to:

- Describe the release;
- Describe the probable nature of the release; and
- Recommend whether further action is warranted, which lead agency should conduct further action, and whether an SI and/or a removal action should be undertaken.

If the PA is the result of a citizen petition, the NCP further requires the lead Federal agency to notify the petitioner of the PA outcome and explain its determination.

The APA report should present and fully support all information that led to abbreviating the PA process. Include Attachment A or equivalent information as part of the APA report. The APA report must also meet all the NCP requirements for a PA report discussed previously, including those requirements for response to a citizen petition. The criteria discussed above should be used to explain the decision.

Adding more information to the APA Checklist is acceptable (preferably on separate pages), but do not omit or delete minimum requirements.

If an APA is not appropriate for the site, complete the full PA discussed in the *Guidance for Performing Preliminary Assessments Under CERCLA*².

How Will the Information be Managed?

CERCLIS/WasteLAN is the official national information management system for the Superfund program. Site assessment data must be entered into CERCLIS/WasteLAN and regularly updated to effectively and efficiently manage Superfund's site assessment process. Please refer to the latest version of EPA's SPIM and CERCLIS/WasteLAN Coding Guidance Manual for instructions on entering APA information into CERCLIS/WasteLAN.

REFERENCES

1. U.S. Environmental Protection Agency, October 1999. Quick Reference Guidance Series - *Improving Site Assessment: Pre-CERCLIS Screening Assessments*. Publication 9375.2-11FS.
2. U.S. Environmental Protection Agency, September 1991. *Guidance for Performing Preliminary Assessments Under CERCLA*. Office of Solid Waste and Emergency Response. Publication 9345.0-01A.
3. U.S. Environmental Protection Agency, December 1991. *Regional Quality Control Guidance for NPL Candidate Sites*. Office of Solid Waste and Emergency Response. Publication 9345.1-08.

FOR MORE INFORMATION

For more information on APAs, please contact Michael Hurd at EPA Headquarters, phone (703) 603-8836 or e-mail at hurd.michael@epa.gov.

ATTACHMENT A

**ABBREVIATED PRELIMINARY ASSESSMENT
CHECKLIST**

ABBREVIATED PRELIMINARY ASSESSMENT CHECKLIST

This checklist can be used to help the site investigator determine if an Abbreviated Preliminary Assessment (APA) is warranted. This checklist should document the rationale for the decision on whether further steps in the site investigation process are required under CERCLA. Use additional sheets, if necessary.

Checklist Preparer:

(Name/Title)	(Date)
(Address)	(Phone)
(E-Mail Address)	

Site Name:

Previous Names (if any):

Site Location:

_____ (Street)

_____, _____ (City) (ST) (Zip)

Latitude:

Longitude:

Describe the release (or potential release) and its probable nature:

Part 1 - Superfund Eligibility Evaluation

If all answers are "no" go on to Part 2, otherwise proceed to Part 3.

	YES	NO
1. Is the site currently in CERCLIS or an "alias" of another site?	<input type="checkbox"/>	<input type="checkbox"/>
2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?	<input type="checkbox"/>	<input type="checkbox"/>
3. Are the hazardous substances potentially released at the site regulated under a statutory exclusion (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC, UMTRCA, or OSHA)?	<input type="checkbox"/>	<input type="checkbox"/>
4. Are the hazardous substances potentially released at the site excluded by policy considerations (i.e., deferred to RCRA corrective action)?	<input type="checkbox"/>	<input type="checkbox"/>
5. Is there sufficient documentation to demonstrate that no potential for a release that could cause adverse environmental or human health impacts exists (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, documentation showing that no hazardous substance releases have occurred, or an EPA approved risk assessment completed)?	<input type="checkbox"/>	<input type="checkbox"/>

Please explain all "yes" answer(s).

EXHIBIT 1
SITE ASSESSMENT DECISION GUIDELINES FOR A SITE

Exhibit 1 identifies different types of site information and provides some possible recommendations for further site assessment activities based on that information. You will use Exhibit 1 in determining the need for further action at the site, based on the answers to the questions in Part 2. Please use your professional judgement when evaluating a site. Your judgement may be different from the general recommendations for a site given below.

Suspected/Documented Site Conditions		APA	Full PA	PA/SI	SI	
1.	There are no releases or potential to release.	Yes	No	No	No	
2.	No uncontained sources with CERCLA-eligible substances are present on site.	Yes	No	No	No	
3.	There are no on-site, adjacent, or nearby targets.	Yes	No	No	No	
4.	There is documentation indicating that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site.	Option 1: APA ⇔ SI	Yes	No	No	Yes
		Option 2: PA/SI	No	No	Yes	NA
5.	There is an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site.	Option 1: APA ⇔ SI	Yes	No	No	Yes
		Option 2: PA/SI	No	No	Yes	NA
6.	There is an apparent release and no documented on-site targets and no documented targets immediately adjacent to the site, but there are nearby targets. Nearby targets are those targets that are located within 1 mile of the site and have a relatively high likelihood of exposure to a hazardous substance migration from the site.	No	Yes	No	No	
7.	There is no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site.	No	Yes	No	No	

Part 3 - EPA Site Assessment Decision

When completing Part 3, use Part 2 and Exhibit 1 to select the appropriate decision. For example, if the answer to question 1 in Part 2 was “no,” then an APA may be performed and the “NFRAP” box below should be checked. Additionally, if the answer to question 4 in Part 2 is “yes,” then you have two options (as indicated in Exhibit 1): Option 1 -- conduct an APA and check the “Lower Priority SI” or “Higher Priority SI” box below; or Option 2 -- proceed with a combined PA/SI assessment.

Check the box that applies based on the conclusions of the APA:	
<input type="checkbox"/> NFRAP	<input type="checkbox"/> Refer to Removal Program - further site assessment needed
<input type="checkbox"/> Higher Priority SI	<input type="checkbox"/> Refer to Removal Program - NFRAP
<input type="checkbox"/> Lower Priority SI	<input type="checkbox"/> Site is being addressed as part of another CERCLIS site
<input type="checkbox"/> Defer to RCRA Subtitle C	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Defer to NRC	
Regional EPA Reviewer: _____	_____
Print Name/Signature	Date

