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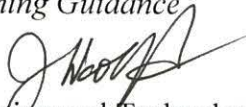
OFFICE OF
SOLID WASTE AND
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EMERGENCY MANAGEMENT

DEC 19 2016

MEMORANDUM

SUBJECT: Revised *Pre-CERCLA Screening Guidance*

FROM: James E. Woolford, Director 
Office of Superfund Remediation and Technology Innovation

TO: National Superfund Program Managers

The Office of Superfund Remediation and Technology Innovation (OSRTI) is pleased to issue the enclosed *Pre-CERCLA Screening Guidance* (Office of Land and Emergency Management [OLEM] Directive # 9200.3-107). This guidance is for U.S. Environmental Protection Agency (EPA), state and tribal Superfund site assessment staff to use when deciding if a new site should be added to the Superfund “active site inventory” for more thorough pre-remedial site evaluation. It supersedes the October 1999 guidance, *Improving Site Assessment: Pre-CERCLIS Screening Assessments* (OSWER 9375.2-11FS). When using the PCS guidance, site assessors should also consult EPA’s latest version of the *Superfund Program Implementation Manual* and their EPA regional point of contact for any additional requirements associated with these activities.

The PCS guidance includes a checklist for recording site information. A completed checklist and map are key components of a PCS report. OSRTI plans to provide an electronic version of the checklist in FY 2017 to facilitate Superfund data and document management requirements.

OSRTI collaborated with EPA, state and tribal Superfund staff to develop this guidance. I want to thank the following individuals who worked with my staff to develop this document: Phyllis Bustamante (NM), Hal Cantwell (OK), Gabriele Hauer (IN), Frank Source (NJ), Molly Stark (NH), Valerie Wilder (MO), Jason White (Cherokee Nation), Cathy Moyik and James Desir (EPA Region 2), Donna Seadler (EPA Region 4), David Brauner (EPA Region 5), LaDonna Turner (EPA Region 6), Randy Brown (EPA Region 7), Sharon Murray (EPA Region 9), and Joanne Labaw (EPA Region 10).

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Pre-CERCLA Screening Guidance

United States Environmental Protection Agency
Office of Land and Emergency Management
OLEM Directive 9200.3-107

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1.0 Overview

This document 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. 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.

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.

This document provides additional background in the following attachments on PCS activities and factors used to make a PCS decision:

- Attachment A is a checklist/decision form recommended for use in documenting the PCS decision and supporting factors.
- Attachment B includes available values for completing several of the checklist fields.
- Attachment C provides a glossary of key terms used in this document.

This document 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.

SPIM/Other Updates

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 this document.

2.0 Background

This section provides background information on PCS activities and includes application points to consider when determining if a PCS is appropriate.

2.1 Definition and Purpose

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 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.

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.

Benefits of Flexibility

In its “Benefits of Flexibility During Pre-CERCLA Screening” report, the Association of State and Territorial Solid Waste Management Officials researched states’ use of PCS in 2014. Highlights of the survey results from 38 states found PCS to be helpful for:

- Prioritizing sites for additional assessment and justifying inclusion in or exclusion from the Superfund active site inventory;
- Referring sites to other federal or state programs;
- Developing site strategies;
- Early identification of sites that may need to be added to the NPL;
- Avoiding “unnecessary stigma” around sites that don’t need to be addressed under Superfund; and
- Conserving resources.

2.2 Authority

Statutory authority – 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).

U.S. EPA policy – 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).

2.3 Participant Roles and Responsibilities

In general, participants responsible for performing PCS activities vary based on agreements in place between EPA, states and tribes.

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.

2.4 Funding Mechanisms

PCS activities can be implemented through three primary funding mechanisms:

1. Funding states and tribes through site or multi-site assessment cooperative agreements;
2. Funding federal contractors; and
3. 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.

2.5 Application

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.
- 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).

PCS Not Applicable at Sites on Federal Facilities 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.

- CERCLA Section 120 (d)(1)

3.0 Implementation

This section describes the steps involved in conducting a PCS, from notification that a PCS may be required to distributing copies of completed PCS documents.

States and tribes conducting PCS work pursuant to a cooperative agreement with EPA should consult with their EPA Regional POC prior to initiating PCS work as necessary to ensure they follow current EPA Regional policies, procedures and practices. This will also help ensure sufficient data is collected to make an appropriate decision about the site.

3.1 Reasons for Conducting a PCS

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;
- 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.

CERCLA 105(d) Petitions

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.

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

3.2 Minimum Requirements to Initiate a PCS

For sites where an assessor believes that a PCS is warranted, the site assessor should ensure the following minimum requirements are met before initiating a PCS on a new site:

1. **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 GPS coordinates, if available); and
 - ✓ A ZIP code is preferred, but not required (see *FY 2017 SPIM section VI.A.8.a*).
2. **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](#) for information on accessing these site inventories. Site name and location data is commonly used to conduct this search.
 - a. 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).
 - b. 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.

- c. 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.

3. **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).

3.3 Notification

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 should include information that may require additional attention. 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.

Notifications Can Highlight:

- Elevated community or other stakeholder interest;
- Citizen petition;
- Known sampling needs; and
- Other site-specific information.

3.4 Data Collection

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 should 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. This step includes:

- 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).

PCS Thresholds

The current SPIM includes national thresholds for conducting PCS activities. The site assessor should consult with the EPA Regional POC for any applicable regional thresholds.

- 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.

3.5 PCS Activities

Examples of data collection activities that may be performed as part of the PCS include:

- Database searches (EPA, other federal, state, tribal);
- Review of relevant files (e.g., state, tribal and local agency files, and owner-operator files);
- Limited Potentially Responsible Party identification and searches;
- Obtaining site access;
- Site reconnaissance visits, walkthroughs and windshield surveys;
- Interviews with property owner-operators;
- Review and discussion of exposure pathways and targets;
- Geographic information system analysis;
- Sampling, subject to EPA policies and procedures; and
- Other tasks as needed to make an appropriate decision for the site.

PCS Sampling Considerations

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.

3.6 PCS Decision-Making Criteria

The following criteria 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.

The following criteria are numbered to reflect the questions in the Pre-CERCLA Screening Checklist/Decision Form (Attachment A):

Superfund Site Inventory Search

1. *An initial search for the site in EPA's Superfund 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?*

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 this document for further guidance.

Release and Targets Information

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

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.

3. *Are there possible targets that could be impacted by a release of contamination at the site?*

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 might be threatened by release of a hazardous substance from the site.

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

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

Examples of Targets:

- Populations;
- Drinking water wells;
- Drinking water surface intakes;
- Municipal wells;
- Fisheries; and
- Sensitive environments.

CERCLA Statutory Exclusions

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 following criteria described in questions 5-8:

5. *Is the 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 this may be naturally occurring asbestos.

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?*

These 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.

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?*

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.

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

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).

CERCLA Petroleum Exclusion

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.



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

U.S. EPA Policy Considerations

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

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.

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.

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

The NPL/RCRA Deferral Policy

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.

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.



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 above-described 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).

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

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?

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.

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

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.

3.7 Reporting

Information collected is used to prepare a draft PCS report. At a minimum, the draft PCS report should 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.
- An area map showing the site location and surrounding area.

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. The draft PCS document includes a recommendation on whether to add the site to the Superfund active site inventory.

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. 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.

3.8 Communication

EPA Regional offices should notify appropriate staff from the state and interested tribes of final PCS document decisions in a timely manner as specified in the SPIM. Additional communication should be performed if EPA makes a final decision that is contrary to a state's or tribe's recommendation.

For a PCS document prepared by a state or tribe, EPA Regional offices should provide the state or tribe with a copy of the final signed and dated document.

For a PCS document prepared by EPA or its contractors, the EPA POC should provide a copy of the final document to the state and interested tribes.

3.9 Information Management

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.

4.0 More Information

The following sources provide current information on conducting PCS activities under the federal Superfund program:

- **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 web site (www.epa.gov/superfund).

5.0 References

1. U.S. Environmental Protection Agency, September 2016. Superfund Program Implementation Manual Fiscal Year 2017. OLEM 9200.3-152.
2. U.S. Environmental Protection Agency, April 23, 2013. *Consistent Field Operations at the U.S. Environmental Protection Agency* memorandum; Bob Perciasepe, Acting EPA Administrator.
3. U.S. Environmental Protection Agency, January 6, 2006. *Latitude Longitude Data Standard*. Standard No.: EX000017.2; Chief Information Officer, EPA.
4. U.S. Environmental Protection Agency, October 1999. Quick Reference Guidance Series - *Improving Site Assessment: Abbreviated Preliminary Assessments*. OSWER 9375.2-09FS.
5. U.S. Environmental Protection Agency, October 1999. Quick Reference Guidance Series - *Improving Site Assessment: Combined PA/SI Assessments*. OSWER 9375.2-10FS.
6. U.S. Environmental Protection Agency, April 2000. Quick Reference Guidance Series - *Improving Site Assessment: Integrating Removal and Remedial Site Evaluations*. OSWER 9360.0-39FS.
7. U.S. Environmental Protection Agency, September 1991. *Guidance for Performing Preliminary Assessments Under CERCLA*. OSWER 9345.0-01A.
8. U.S. Environmental Protection Agency, December 1991. *Regional Quality Control Guidance for NPL Candidate Sites*. OSWER 9345.1-08.

Attachment A: Pre-CERCLA Screening Checklist/Decision Form

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. Fields marked with an asterisk * are limited to the values available in Attachment B. Attachment C provides a glossary of other terms used in this form.

Region: ____ State/Territory: _____ Tribe: _____ EPA ID No. (If Available)

Site Name:
Other Site Name(s): _____

Site Location: _____
(Street)

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

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 105d Petition for Preliminary Assessment? Yes No Undetermined If Yes, Petition Date (mm/dd/yyyy): _____

RCRA Subtitle C Site Status: Is site in RCRAInfo? Yes No Undetermined If Yes, RCRAInfo Handler ID #: _____

Ownership Type*: _____ Additional RCRAInfo ID #(s): _____

Site Type*: _____ State ID #(s): _____

Site Sub-Type*: _____ Other ID #(s): _____

Federal Facility? Yes No Undetermined Federal Facility Owner*: _____

Formerly Used Defense Site (FUDS)? Yes No Undetermined Federal Facility Operator*: _____

Federal Facility Docket? Yes No Undetermined If Yes, FF Docket Listing Date (mm/dd/yyyy): _____

Federal Facility Docket Reporting Mechanism*: _____

Native American Interest? Yes No Undetermined If Yes, list Tribe: _____

Additional Tribe (s): _____

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:

Geospatial Information

Latitude: + .

Longitude: - .

Decimal Degree North (e.g., +38.859156)

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 — see Attachment B.

- 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 – see Attachment B.

- 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. Attachment B contains examples.
- 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.

Attachment A: Pre-CERCLA Screening Checklist/Decision Form

Complete this checklist to help 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"/>

Attachment A: Pre-CERCLA Screening Checklist/Decision Form

- Preparer's Recommendation:** Add site to the Superfund active site inventory.
 Do not add site to the Superfund active site inventory.

Please explain recommendation below:

PCS Summary and Decision Rationale

Use this section to summarize PCS findings and support the decision to add or not add the site to the Superfund active site inventory for further investigation. Information does not need to be specific but, where known, can include key factors such as source and waste characteristics (e.g., drums, contaminated soil); evidence of release or potential release; threatened targets (e.g., drinking water wells); key sampling results (if available); CERCLA eligibility; involvement of other cleanup programs; and other supporting factors. Attach additional pages as necessary.

Insert text here:

Site Assessor: _____

Print Name/Signature

_____ Date

EPA Regional Review and Pre-CERCLA Screening Decision

Add site to the Superfund active site inventory for completion of a:

- Standard/full preliminary assessment (PA)
- Abbreviated preliminary assessment (APA)
- Combined preliminary assessment/site inspection (PA/SI)
- Integrated removal assessment and preliminary assessment
- Integrated removal assessment and combined PA/SI
- Other: _____

Do not add site to the Superfund active site inventory. Site is:

- Not a valid site or incident
- Being addressed by EPA's removal program
- Being addressed by a state cleanup program
- Being addressed by a tribal cleanup program
- Being addressed under the Resource Conservation and Recovery Act
- Being addressed by the Nuclear Regulatory Commission
- Other: _____

EPA Regional

Reviewer: _____

Print Name/Signature

_____ Date

Attachment B: PCS Checklist/Decision Form Values

EPA geospatial guidance requires programs to identify geographic features associated with locational data and also to set a target accuracy for those measurements based on business requirements. Target accuracy is defined in terms of ranges (“tiers”) rather than point values. Table 1 below shows Superfund point feature types useful for pre-CERCLA screening, along with their EPA target accuracy tiers and common collection methods that can satisfy those tiers. Users may use other technologies listed in the *EPA Latitude/Longitude Data Standard* provided they meet or exceed the target accuracy tier value for the point description in question.

Table 1: Geospatial Data		
Accuracy Tiers (corresponding values in meters)	Point Description	Common Point Collection Methods
Tier 2 (1 – 5 m)	Sampling Point	Professional GPS (with differential correction: SBAS or WAAS)
Tier 3 (6 – 25 m)	<ul style="list-style-type: none"> • Bounding box (NW) < 50 acres • Bounding box (SE) < 50 acres • Monitoring station (air) • Monitoring station (surface water) • Monitoring station (well/groundwater) • Sampling point (pre-CERCLA) • Site entrance • Site geographic centroid <p>Examples of “Other Distinguishing Site Feature” entries: adit, berm, cap, cultural resource, ditch, excavation, facility, lagoon, pile, pit, pond, storage tank.</p>	<ul style="list-style-type: none"> • Online map interpolation (e.g., ESRI ArcGIS, ESRI AGOL, Google Maps, Google Earth, Bing Maps, MapQuest, TIGER) • GPS Handheld Unit (e.g., Code (Pseudo Range) Standard Position) • GPS Smartphone, with accuracy within 25m (e.g., Wi-Fi assist and/or satellite documentation > 10 satellites)
Tier 4 (26 – 100 m)	<ul style="list-style-type: none"> • Site address (geocode) urban • Bounding box (NW) > 50 acres • Bounding box (SE) > 50 acres 	<ul style="list-style-type: none"> • GPS with accuracy greater than or equal to 25 meters • GPS with unspecified accuracy (including smartphone with no documentation) • Address Matching: Urban (e.g., ESRI, NAVTEQ, Google Maps, Google Earth, TIGER, Post Office)
Tier 5 (101 – 200 m)	<ul style="list-style-type: none"> • Site address (geocode) rural • Approximate center of site 	<ul style="list-style-type: none"> • Address Matching: Rural (e.g., ESRI, NAVTEQ, Google Maps, Google Earth, TIGER, Post Office) • Map Interpolation (< 1:20,000 scale)

Tables 2 through 6 provide allowable entries for corresponding fields on the page A-1 of the Pre-CERCLA Screening Checklist/Decision Form.

Table 2: Ownership Type	
<ul style="list-style-type: none"> ▪ Bank/loan company ▪ Brownfields/public ▪ County owned ▪ District owned ▪ Federally owned ▪ Formerly federally owned or operated ▪ Government owned / contractor operated ▪ Mixed ownership ▪ Municipality 	<ul style="list-style-type: none"> ▪ Other ▪ Private ▪ Privately owned / government operated ▪ Property defaulted back to government ▪ State owned ▪ Tribal government ▪ Trustee, federal ▪ Trustee, state ▪ Unknown

Attachment B: PCS Checklist/Decision Form Values

Table 3: Site Type/Site Sub Type Combinations

Table 3: Site Type/Site Sub Type Combinations	
<p>Site Type: Mining</p> <ul style="list-style-type: none"> • Coal • Metals • Mineral processing/smelting only • Mining only • Mining and mineral processing/smelting • Multiple • Non-metal minerals • Oil and gas • Uranium mining • Uranium processing • Other (enter other category name) • Unknown 	<p>Site Type: Waste Management</p> <ul style="list-style-type: none"> ▪ Co-disposal landfill (municipal and industrial) ▪ Illegal disposal/open dump ▪ Industrial waste facility (non-generator) ▪ Industrial waste landfill ▪ Mine tailings disposal ▪ Multiple ▪ Municipal solid waste landfill ▪ Radioactive waste treatment, storage, disposal (non-generator) ▪ Other (enter other category name) ▪ Unknown
<p>Site Type: Manufacturing/Processing/Maintenance</p> <ul style="list-style-type: none"> ▪ Chemicals and allied products ▪ Coal gasification ▪ Coke production ▪ Electric power generation and distribution ▪ Electronic/electrical equipment ▪ Fabrics/textiles ▪ Lumber and wood products – pulp and paper ▪ Lumber and wood products – wood preserving / treatment ▪ Metal fabrication, finishing, coating and allied industries ▪ Multiple ▪ Oil and gas refining ▪ Ordnance production ▪ Plastics and rubber products ▪ Primary metals/mineral processing ▪ Radioactive products ▪ Tanneries ▪ Trucks, ships, trains, aircraft and related components ▪ Other (enter other category name) ▪ Unknown 	<p>Site Type: Other</p> <ul style="list-style-type: none"> ▪ Agricultural (e.g., grain elevator) ▪ Contaminated sediment site with no identifiable source ▪ Dry-cleaning operations ▪ Dust control ▪ Ground water plume site with no identifiable source ▪ Lighthouse ▪ Military – other ordinance ▪ Multiple ▪ Product storage / distribution ▪ Ranger station ▪ Research, development, and testing facility ▪ Residential ▪ Retail/commercial ▪ School or daycare ▪ Spill or other one-time event ▪ Transportation (e.g., railroad yards, airport, barge docking site) ▪ Treatment works, septic tanks, other sewage treatment ▪ Unknown ▪ Other (enter other category name) ▪ Work Center
<p>Site Type: Recycling</p> <ul style="list-style-type: none"> ▪ Automobiles and tires ▪ Batteries, scrap metals, secondary smelting, precious metal recovery ▪ Chemicals and chemical waste (e.g., solvent recovery) ▪ Drums and tanks ▪ Multiple ▪ Waste, used oil ▪ Other (enter other category name) ▪ Unknown 	

Attachment B: PCS Checklist/Decision Form Values

Tables 4 and 5 apply to sites identified as federal facilities.

Table 4: Federal Facility (FF) Owner Type	
<ul style="list-style-type: none"> ▪ Army Corps of Engineers ▪ Bureau of Indian Affairs ▪ Bureau of Land Management ▪ Bureau of Mines ▪ Bureau of Reclamation ▪ Centers for Disease Control and Prevention ▪ Defense Logistics Agency ▪ Department of Agriculture ▪ Department of Commerce ▪ Department of Defense ▪ Department of Energy ▪ Department of Health and Human Services ▪ Department of Health, Education and Welfare ▪ Department of Homeland Security ▪ Department of Justice ▪ Department of Labor ▪ Department of Transportation ▪ Department of the Interior ▪ Department of the Treasury ▪ Environmental Protection Agency ▪ Federal Aviation Administration ▪ Federal Bureau of Investigation 	<ul style="list-style-type: none"> ▪ Fish and Wildlife Service ▪ Food and Drug Administration ▪ General Services Administration ▪ Maritime Administration ▪ National Aeronautics and Space Administration ▪ National Guard ▪ National Imagery and Mapping Agency (formerly Defense Mapping Agency) ▪ National Park Service ▪ Secret Service ▪ Small Business Administration ▪ State Department ▪ Transportation Security Administration ▪ U.S. Customs and Border Protection ▪ U.S. Air Force ▪ U.S. Army ▪ U.S. Coast Guard ▪ U.S. Forest Service ▪ U.S. Marshall's Office ▪ U.S. Navy ▪ U.S. Postal Service ▪ Veterans Administration

Table 5: Federal Facility (FF) Operator Type	
<ul style="list-style-type: none"> ▪ Agency for Toxic Substances and Disease Registry ▪ Army Corps of Engineers ▪ Bureau of Engraving and Printing ▪ Bureau of Indian Affairs ▪ Bureau of Land Management ▪ Defense Logistics Agency ▪ Department of Agriculture ▪ Department of Defense ▪ Department of Energy ▪ Department of Health and Human Services ▪ Department of Homeland Security ▪ Department of Justice ▪ Department of Labor ▪ Department of Transportation ▪ Department of the Interior ▪ Drug Enforcement Administration ▪ Environmental Protection Agency ▪ Federal Aviation Administration ▪ Federal Bureau of Investigation 	<ul style="list-style-type: none"> ▪ Fish and Wildlife Service ▪ Food and Drug Administration ▪ General Services Administration ▪ Geological Survey ▪ Maritime Administration ▪ National Aeronautics and Space Administration ▪ National Guard ▪ National Park Service ▪ Secret Service ▪ State Department ▪ Transportation Security Administration ▪ U.S. Customs and Border Protection ▪ U.S. Air Force ▪ U.S. Army ▪ U.S. Coast Guard ▪ U.S. Forest Service ▪ U.S. Navy ▪ U.S. Postal Service ▪ Veterans Administration

Attachment B: PCS Checklist/Decision Form Values

Table 6 applies to sites identified as federal facilities which are or will be added to the Federal Agency Hazardous Waste Compliance Docket (Federal Facility Docket).

Table 6: Federal Facility Docket Reporting Mechanism

<p><u>CERCLA section 103</u> Requires owners or operators of vessels or facilities to notify the National Response Center of a release of a reportable quantity of a hazardous substance (notification of a release or potential release).</p> <p><u>RCRA section 3005</u> Provides EPA authority to establish a permitting system for hazardous waste treatment, storage and disposal facilities (TSDFs), which in turn requires submission of certain information as part of the permit application (interim status/permitting authority). The hazardous waste permitting program is generally implemented by authorized states.</p>	<p><u>RCRA section 3010</u> Requires hazardous waste generators, transporters, and TSDF owner-operators to notify EPA of their hazardous waste activities (notification of hazardous waste activity).</p> <p><u>RCRA section 3016</u> Requires federal facilities to submit an inventory of hazardous waste sites they own or operate, or have owned and operated in the past (biennial inventory of hazardous waste activities).</p>
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Attachment C: Glossary of Terms

Abbreviated Preliminary Assessment (APA) – An APA uses the same information as the conventional preliminary assessment (PA), but relies on professional judgment and past site assessment experience to make decisions about a site earlier in the PA process. In these early decision instances, an APA report is generated rather than a full PA report.

Active site inventory – Consists of sites placed on the National Priorities List (NPL), and sites not on the NPL where site assessment, removal, remedial, enforcement, cost recovery or oversight activities are planned or are being monitored or conducted.

Actual release – In the context of the Hazard Ranking System (HRS), an actual release is when a hazardous substance has been documented to have been released in the environment. HRS requires documentation by direct observation or chemical analysis for a release to be considered an actual release.

Archive site inventory – Consists of non-NPL sites that were formerly in the active site inventory which have no further site assessment, removal, remedial, enforcement, cost recovery or oversight needed under the federal Superfund program based on available information.

CERCLA – The Comprehensive Environmental Response, Compensation and Liability Act of 1980 is the legislation that established the federal Superfund for response to uncontrolled releases of hazardous substances to the environment.

CERCLA 105(d) petition – CERCLA section 105(d) provides the public with an opportunity to formally petition the federal government to conduct a PA. Commonly referred to as a citizen's petition or a PA petition.

Combined Preliminary Assessment/Site Inspection (PA/SI) – The combined PA/SI assessment integrates activities typically performed during the PA (information gathering, site reconnaissance) with those typically performed during the SI (review of data, development of field work plans, field sampling, filling data gaps) to achieve one continuous site investigation.

Exposure pathways – Refers to the Hazard Ranking System exposure pathways: ground water migration, surface water migration, air migration, and soil exposure.

Federal Agency Hazardous Waste Compliance Docket – This docket contains information on federal facilities that manage hazardous waste or from which hazardous substances have been, or may be, released. Specifically, the docket contains information submitted to EPA under RCRA sections 3005, 3010 and 3016, and CERCLA section 103.

Federal facility – A site that is federally owned or subject to the jurisdiction, custody or control of a department, agency or instrumentality of the United States, except for land held in trust by the United States for an Indian tribe.

Field analytical methods – Analytical methods used in the field to provide sample screening information during field activities and real-time analytical data. Sample analysis is performed from a field base, mobile laboratory, or with portable instruments.

Field screening – Use of field analytical methods to provide sample screening information during field activities and provide real-time analytical data.

Integrated Assessments – Merging remedial site assessment and removal assessment data collection into a single event and producing a single report meeting the needs of both programs. These are performed for efficiency purposes as warranted by site conditions.

Attachment C: Glossary of Terms

Hazard Ranking System (HRS) – Scoring system EPA uses to assess the relative threat associated with actual or potential releases of hazardous substances at sites. The HRS is the primary way of determining whether a site is to be included on the NPL.

Hazardous substance – Material defined as a hazardous substance in CERCLA section 101(14): Any substance designated pursuant to section 311(b)(2)(A) of the Federal Water Pollution Control Act, (B) any element, compound, mixture, solution, or substance designated pursuant to section 201 of this Act, (C) any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of the Solid Waste Disposal Act (but not including any waste the regulation of which under the Solid Waste Disposal Act has been suspended by Act of Congress), (D) any toxic pollutant listed under section 307(a) of the Federal Water Pollution Control Act, (E) any hazardous air pollutant listed under section 112 of the Clean Air Act, and (F) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to section 7 of the Toxic Substances Control Act. The term excludes substances covered under the Petroleum Exclusion, natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

Likelihood of Release – In the context of the Hazard Ranking System, a measure of the likelihood that a waste has been or will be released to the environment.

National Oil and Hazardous Substances Pollution Contingency Plan (NCP) – Regulation that establishes roles, responsibilities and authorities for responding to hazardous substance releases. Commonly known as the National Contingency Plan, the NCP established the Hazard Ranking System as the principal mechanism for placing sites on the National Priorities List.

Native American Interest – Indicates site may be of interest to one or more Native American entities whose members or land is directly affected by the release.

Non-federal facility – The site is not federally owned nor subject to the jurisdiction, custody or control of a department, agency or instrumentality of the United States. Includes sites on land held in trust by the United States for an Indian tribe.

Non-site inventory – Sites that are pre-screened prior to entry into the active site inventory and determined not to require further Superfund remedial assessment are tracked in the non-site inventory. Should a screened site be resubmitted to the federal Superfund program, minimal information is tracked on these sites to account for the pre-screening work and for future reference. The non-site inventory may also be used to track other non-site specific information.

Pollutant or contaminant – Material defined as a pollutant or contaminant in CERCLA Section 101(33): Includes, but is not limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions or physical deformations, in such organisms or their offspring. The term excludes substances covered under the Petroleum Exclusion, natural gas, natural gas liquids, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural and such synthetic gas).

For Hazard Ranking System (HRS) scoring purposes, pollutant or contaminant is scored the same as a hazardous substance, except where otherwise noted by the HRS.

Potential to release – In the Hazard Ranking System, potential to release for the ground water pathway is a calculation based on containment, net precipitation, depth-to-aquifer and travel time.

Attachment C: Glossary of Terms

Pre-CERCLA screening (PCS) – An initial review of existing information available for a potential Superfund site to determine if a release or potential release of a hazardous substance has occurred and is eligible for further remedial evaluation under CERCLA authority. PCS also determines whether the site should be entered into the active site inventory for further assessment. Pre-CERCLA screening intends to prevent entry of uncontaminated sites or sites ineligible under CERCLA into the active site inventory, and to help site assessors determine whether the site needs further attention under Superfund or another cleanup program. PCS activities generally apply only to non-federal facility sites.

Preliminary assessment (PA) – Initial stage of site assessment under Superfund at a site entered into the active site inventory. The PA distinguishes between sites that pose little or no threat to human health and the environment and sites that require further investigation.

Release – In the context of the Hazard Ranking System (HRS), a release refers to hazardous substances introduced into the environment. The HRS measures likelihood of release.

Remedial assessment – Begins when a site is discovered and entered into active site inventory, and continues until the decision on whether the site requires remedial cleanup attention.

Site accessibility – Relative ease or difficulty obtaining physical access to a site, including legal considerations to conduct an onsite reconnaissance.

Site reassessment – The gathering and evaluation of new information on a site previously assessed under the federal Superfund program to determine whether further Superfund attention is needed. A site reassessment serves as a supplement to previous assessment work and not as a replacement for traditional assessment activities (e.g., preliminary assessment, site inspection).

Site inspection (SI) – The second stage of site assessment at a site entered into the active site inventory. SIs are performed at sites that receive a further-action recommendation after the preliminary assessment (PA), and build on PA information. SIs typically include sampling to identify hazardous substances, releases and targets exposed to actual contamination. They help characterize sites that pose the greatest threats to human health and the environment.

Source – As defined in the Hazard Ranking System, any area where a hazardous substance has been deposited, stored, disposed or placed, plus those soils that have become contaminated from migration of a hazardous substance. Sources do not include those volumes of air, ground water, surface water, or surface water sediments that have become contaminated by migration, except for a ground water plume with no identified source or contaminated surface water sediments with no identified source. In these instances, the plume or contaminated sediments may be considered a source.

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, EPA's Strategic Plan, and Superfund program internal processes. The SPIM provides standardized and common definitions for Superfund program accomplishments and processes for planning and tracking these accomplishments through program targets and measures.

Targets – Presence of people, physical resources (e.g., drinking water wells, surface water intakes), and environmental resources (e.g., sensitive environments, fisheries) that might be threatened by release of a hazardous substance from the site.