



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

APR 26 1990

T.J. Sheckels, Head
Restoration Management Section
Department of Navy
Northern Division
Naval Facilities Engineering Command
Philadelphia, Pennsylvania 19112-5094

Re: Naval Air Propulsion Center, Trenton, NJ

Dear Mr. Sheckels:

This is in reference to the copy of the Final Site Inspection Report for the Naval Air Propulsion Center, Trenton, New Jersey dated February 1990 which you recently sent to the United States Environmental Protection Agency's (EPA) Region II office.

Since the Site Inspection Report is new information being submitted for the subject facility, EPA is required to evaluate the document so as to determine possible future action at the site. It will greatly facilitate EPA's review of the SI report if you complete the attached checklist which is a new requirement of EPA. I believe you will find the checklist self explanatory. Your cooperation in completing and submitting the checklist as early as possible is appreciated.

If you have any questions, feel free to call to Ms. Helen Shannon of my staff at (212) 264-6664.

Sincerely,

A handwritten signature in cursive script that reads "Robert J. Wing".

Robert J. Wing, Chief
Federal Facilities Section

Attachment

PRELIMINARY ASSESSMENTS & SCREENING SITE INSPECTIONS
AT FEDERAL FACILITIES

This checklist is designed to facilitate the performance of Pre-Remedial investigations, namely Preliminary Assessments (PAs) and Screening Site Inspections (SSIs), at Federal Facilities. The following are not intended to take the place of existing guidance but are to be completed and attached to the top of site reports you submit to EPA. Please refer to the Preliminary Assessment Guidance FY 88 (OSWER Directive 9345.0-01) for detailed explanations on how to develop a PA Report. This checklist has been taken from the PA Guidance document and has been modified to allow site investigators to reference those data items that are known about the site. This should eliminate confusion as to the source of information as it will be referenced adjacent to the data items. It is anticipated that this approach will enhance the interaction between Facility investigators and their counterpart site reviewers at EPA.

*IN THE REFERENCE COLUMN ON THE RIGHT SIDE OF THE PAGE, PLEASE NOTE THE PAGE NUMBER IN THE SITE REPORT WHERE THE CORRESPONDING PIECE OF INFORMATION CAN BE FOUND. THOSE ITEMS THAT ARE BOLDED AND HAVE CORRESPONDING DARKENED CIRCLES ARE THE INFORMATION PIECES MOST CRITICAL FOR SITE EVALUATION. BY FILLING OUT THIS CHECKLIST PROPERLY AND ATTACHING IT TO EVERY PA AND SSI PACKAGE, THE EPA REVIEWER WILL HAVE A READY REFERENCE AS TO WHAT INFORMATION HAS OR HAS NOT BEEN DOCUMENTED. This should enhance the process and facilitate review of site packages.

In this checklist, each migration pathway identifies items pertinent to the existing Hazard Ranking System (HRS) and the proposed revisions to the HRS. The HRS will likely change in response to public comments on the proposed revisions; thus, some of the items on the checklist will change. However, they should facilitate the evaluation of each pathway when it becomes final. It is the intent of the sections addressing the proposed changes to the HRS to present the general information to EPA, State, and contractor personnel so that potentially important revised HRS data can be reviewed and considered in PAs and SSIs done under FY 88 guidance.

A referenced source should be cited for each checklist item. The list of all of these sources should be attached to the PA report itself. Referenced sources can range from visual observation, to a record of communication, to an unpublished or published document or report.

SCREENING SITE INSPECTIONS

The Screening Site Inspection (SSI) builds upon information collected during the PA by verifying and augmenting the data, as well as by collecting additional data, including field samples to

further characterize the site. The purpose of sampling during the SSI is to identify the types of contaminants present, to assess whether a release of hazardous substances has occurred, to look for evidence of actual human and environmental exposure to contaminants, and to determine the likelihood of the site scoring high enough to be placed on the National Priorities List (NPL). (PLEASE FILL OUT AND ATTACH THE CHECKLIST TO ALL SSI REPORTS SUBMITTED TO EPA FOR REVIEW.)

It is recommended that SSIs performed at Federal Facilities follow the guidance set forth in:

- * SI/HRS Information Bulletin, vol 1, no 1, November 1987
- * SI/HRS Information Bulletin, Issue 2, April 1989
(OSWER Directive 9200.5-302)
- * Expanded Site Inspection Transitional Guidance FY 88
(OSWER Directive 9345.1-02, October 1987).

Final SSI guidance will be developed following the finalization of the HRS.

**9345.0-01
OSWER DIRECTIVE
PA CHECKLIST**

REFERENCE (PAGE NO.)

I. SITE BACKGROUND INFORMATION

- Site name _____
- Site number _____
- Address _____
- Coordinates (latitude and longitude in degrees, minutes, seconds, or township and range numbers) _____
- Directions to site (starting from nearest public road) _____

II. RESPONSIBLE PARTIES

- Owner _____
- Address (current and past, if available) _____
- Telephone number _____
- Operator _____
- Operator's address _____
- Operator's telephone number _____
- Type of ownership (specify private, Federal, state, county, municipal) _____

III. OVERVIEW/SITE HISTORY

- Site operations
 - history/years of operation _____
 - nature of operations (manufacturing, waste disposal, storage, etc.) _____
- Description of any emergency or remedial actions that have occurred at the site _____

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- Description of any prior spills _____
- Description of relevant permits _____
- Description of existing sampling and analytic data and brief summary of data quality _____
- Evaluate the data quality for the following:
 - sample objectives _____
 - age/comparability _____
 - analytical methods _____
 - detection limits _____
 - QA/QC _____

IV. WASTE CONTAINMENT/HAZARDOUS SUBSTANCE IDENTIFICATION

- Describe as specifically as possible the methods of hazardous substance disposal, storage, or handling. _____
- Describe the condition/integrity of each storage disposal feature or structure. Evaluate from the perspective of each migration pathway (e.g., ground water pathway - nonexistent natural or synthetic liner, corroding underground storage tank; surface water - inadequate freeboard, corroding bulk tanks; air - unstabilized slag piles, leaking drums, etc.). _____
- Describe any secondary containment features/structures (such as run-on diversion system, leachate collection systems). _____
- Describe size/volume of all features/structures that contain hazardous substances or volume of previously reported spills. _____
- Describe as precisely as possible existing permits and the types of hazardous substances handled on site. _____

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- Discuss any records or manifests which provide data on volume of hazardous substances handled/disposed/released on site.

V. GROUND WATER PATHWAY

- Determine if ground water within four¹ miles of the site is used for any of the following purposes (if the answer to this is "unusable," then it is not necessary to answer the following questions).
 - private or public drinking water source
 - commercial
 - irrigation (5-acre minimum)
 - industrial
 - not used, but usable
 - unusable
- Determine the population drinking ground water drawn from wells within four¹ miles of the site.
- Identify nearest well within four¹ miles that is a source of drinking water.
- As precisely as possible, describe the geology and hydrogeology of the area (including names, thickness, types of material and depth from surface, including soils).
- Discuss any evidence of discontinuities between aquifers/aquitards within four¹ miles of the site.
- Discuss any evidence of interconnections between aquifers within two¹ miles of the site.
- Estimate annual net precipitation (by summing monthly values).

¹Distance based on proposed revisions to the HRS.

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- Discuss soil or geological conditions that might inhibit or facilitate ground water migration. _____
- Discuss, if possible, alternative water supply sources that are readily available. _____
- Discuss any qualitative, quantitative, or circumstantial (e.g., closure of a well) evidence of a release to ground water. _____

VI. ADDITIONAL FACTORS BASED ON PROPOSED REVISIONS TO THE HRS FOR THE GROUND WATER PATHWAY

- Identify if any sources lie within a Wellhead Protection Area as designated according to Section 1428 of the Safe Drinking Water Act.¹ _____
- Determine if the site is located in an area of karst terrain. _____

VII. SURFACE WATER PATHWAY

- Discuss the probable surface runoff patterns from the site to surface waters. _____
- Discuss whether the facility is located in surface water (e.g., marsh, swamp) or a floodplain. _____
- From a topographic map, calculate and discuss the slope between the point where hazardous substances begin to migrate and the probable point of entry into the surface water body. _____
- Describe surface water bodies of concern within the 152-mile target distance limit. _____

¹Factor based on proposed revisions to the HRS.

²Distance based on proposed revisions to the HRS.

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○ Identify if surface water drawn from intakes within 15¹ miles from the probable point of entry is used for any of the following purposes:

- irrigation of commercial food or forage crops (5-acre minimum)
- commercial livestock watering
- commercial food preparation
- commercial/industrial purposes other than drinking water, recreation, or fishery uses

● Identify and discuss the nature and size of any of the following targets within the 15¹-mile target distance limit:

- population served by intakes drawing drinking water
- population associated with recreational use²
- sensitive environments (including fresh water or coastal wetlands [5-acre minimum] and critical habitats of a federally-designated endangered species)
- economically important resources (e.g., shellfish)²

● Discuss any qualitative, quantitative, or circumstantial (e.g., contaminated surface water downstream of the site) evidence of a release to surface water.

VIII. ADDITIONAL FACTORS BASED ON PROPOSED REVISIONS TO THE HRS FOR THE SURFACE WATER PATHWAY

○ From a topographic map, estimate the size (in acres) of the upgradient drainage area from the site.

¹Distance based on proposed revisions to the HRS.
²Factor based on proposed revisions to the HRS.

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- Discuss the average annual stream-flow in the vicinity of the site. _____
- Discuss any biological sampling that might assess the food chain and recreational impacts. _____
- If fisheries (recreational or commercial) exist within the 15-mile target distance limit, assess each of the following:
 - acreage of oceans, large lakes, or rivers _____
 - acreage of ponds or lakes fed by low-volume streams _____

IX. ADDITIONAL FACTORS BASED ON PROPOSED REVISIONS TO THE HRS FOR THE AIR PATHWAY

- Determine the population within a four-mile radius of the site (allocated in 1/4, 1/2, 1, 2, 3, 4-mile ring distances). _____
- Determine the distance to the nearest residence or regularly occupied building as measured from any onsite emission source. If onsite, determine how many residents or workers occupy the building. _____
- Determine the distance to the following land uses within a four-mile radius:
 - commercial/industrial _____
 - residential _____
 - schools _____
 - parks _____
 - agricultural _____
- Identify, locate, and discuss any nearby fresh water or coastal wetlands (5-acre minimum) or critical habitats of federally-designated endangered species that could be affected by a release. _____

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- Discuss any quantitative or qualitative evidence of a release to air.
- Determine particulate source mobility value (see Figure 2-3 in the proposed rule).

X. ADDITIONAL FACTORS BASED ON PROPOSED REVISIONS TO THE HRS FOR THE ONSITE EXPOSURE PATHWAY

- Discuss any qualitative or quantitative evidence of onsite soil contamination. If there is no evidence of onsite soil contamination, then it is not necessary to answer the following questions.
- Determine the onsite population (i.e., people living or attending school or day care on contaminated property).
- Determine the population within one mile of the site (i.e., individuals who live or go to school within one mile of the site).
- Describe any restrictions/barriers on accessibility to onsite waste materials.
- Identify and discuss any onsite terrestrial sensitive environments.
- Describe the area of surface contamination (both on and off site).
