



State of Oregon
Department of
Environmental
Quality

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Site Assessment

Introduction

Site Assessment (SA) is an integral part of DEQ's Cleanup Program. As the entry point into DEQ's Voluntary Cleanup and high-priority cleanup programs, SA performs a critical "gatekeeping" function. SA staff examine sites where releases of hazardous substances have occurred or may have occurred, to determine whether these sites may be threatening human health or the environment.

The SA Program evaluates many property types, from small commercial lots to roadside chemical spills to large industrial facilities. The program assesses all hazardous substances that can contaminate soil, surface water, sediments, groundwater, or air. Program components are: *discovery*; *evaluation/ranking*; *recommending further action*; and *listing*. Each of these program elements is discussed below.

Discovery

Discovery refers to how SA staff learn of contaminated or potentially contaminated properties. This may occur by:

1. referral from other DEQ programs or from other public agencies;
2. reports of chemical spills;
3. citizen complaints;
4. contamination appearing on adjacent properties;
5. data submitted voluntarily by property owners or their representatives; or
6. SA staff research to discover sites that could affect Vulnerable Areas in Oregon.

SA staff perform quick reviews of all new site information and focus first on those sites with the greatest potential to threaten human health or the environment. At this time, SA adds new sites to DEQ's Environmental Cleanup Site Information (ECSI) database. ECSI is an electronic tracking system of sites with known or potential contamination, as well as sites that have been cleaned up; it is updated as sites progress through different stages of the cleanup process.

Evaluation/Ranking

Site Assessment's first documented action at a site is called a *screening*, which is a brief review of readily available information on site history, contamination, and ways that human or environmental receptors could be exposed to site contamination. Screenings are desktop exercises

that occasionally include site visits, but rarely involve DEQ sampling. Screenings culminate in general recommendations for further site action that include priority rankings (low, medium, or high). Priorities are assigned based on threats from contamination and the urgency in implementing further actions. SA staff use a ranking tool developed within DEQ, the *Site Assessment Prioritization System* (SAPS) to guide their assignment of site priorities. Screenings are usually documented in written *Strategy Recommendations*.

At certain sites, DEQ staff will conduct a Preliminary Assessment (PA). This involves a detailed evaluation of facility operational history, waste-management practices, past sampling data (if available), and potential exposure pathways. PAs incorporate site visits and sometimes include limited sampling. However, sampling at this stage more commonly occurs during an *Expanded Preliminary Assessment* (XPA), which is designed to determine whether contamination suspected at a site is in fact present.

The ECSI database, which is available to the public, summarizes results of SA evaluations.

Recommending Further Action

Depending on the amount of information available and the nature of site contamination, SA may recommend that the property owner conduct a PA, an XPA, a remedial investigation (RI), or a removal action. At some sites, all that is needed is further documentation or analysis indicating that hazardous substances pose no significant threats. At a few other sites, SA staff may be able to determine from existing data that *no further action* is necessary. For sites needing further action, SA may offer facility owners and operators the following options: 1) participate in DEQ's Voluntary Cleanup Program or Independent Cleanup Pathway; 2) conduct further actions independently (i.e., without any DEQ involvement); or 3) wait for DEQ to initiate further action under the state's enforcement authority.

The SA Program tracks its costs in performing site evaluations, and notifies property owners or operators of this policy at the beginning of the screening process. DEQ seeks to recover these costs when SA recommends further investigation or cleanup at a site.

Confirmed Release List

For public notification purposes, state law requires DEQ to maintain a Confirmed Released List (CRL) and an Inventory of Hazardous Substance Sites (Inventory). The CRL is a list of sites with documented releases of hazardous substances. The Inventory is a subset of the CRL, consisting of contaminated sites where a PA (or equivalent) has been completed and where further investigation or cleanup is needed to protect human health and the environment. In most cases, DEQ listing decisions originate from SA staff recommendations.

If a site meets the criteria for listing, DEQ notifies owners/operators of its proposal to add the site to the CRL and/or Inventory, and permits comments on the proposed listing. In its listing decision letter, DEQ responds to all substantive issues raised in comment letters. DEQ may decide not to list a site if new information demonstrating that the site does not meet the criteria for listing is submitted during the 45-day comment period.

For More Information

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