

# Superfund Site Assessment Program Toolbox: ASTSWMO Site Assessment Focus Group Report



**Walter Wright, Jr.**  
wwright@mwlaw.com  
(501) 688.8839

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The Association of States and Territorial Solid Waste Management Officials ("ASTSWMO") issued a September 2019 report addressing certain Comprehensive Environmental Response, Compensation, and Liability Act (i.e., Superfund) issues titled:

*Superfund Site Assessment Program Toolbox ("Report")*

The ASTSWMO Site Assessment Focus Group prepared the Report with assistance from the United States Environmental Protection Agency ("EPA") under a Cooperative Agreement.

The Superfund Site Assessment Program ("Site Assessment Program") is described as a partnership between EPA and the states and territories. The primary purpose of the Site Assessment Program is the identification of:

... releases or threat of releases of hazardous substances, pollutants, or contaminants that may endanger human health or the environment, and determine whether those sites qualify for inclusion on the National Priority List (NPL).

The *Report* notes that EPA has developed variations of the traditional site assessment process, the purpose of which is stated to "allow flexibility for efficiency and reduction of duplicate tasks" which are identified as:

- Pre-CERCLA Screening with sampling
- Preliminary Assessment with sampling
- Combined Preliminary Assessment/Site Inspection
- Abbreviated Preliminary Assessment

This *Report* is a follow-up to a previous ASTSWMO report published in August 2017. The goals of this Report are identified as:

- Report on the States' use of flexible approaches for document preparation during the Site Assessment process;
- Provide examples of the States' variations of traditional Site Assessments documents;
- Provide sample equipment checklists for field sampling activities;
- Provide a discussion of field screening tools used for air, soil, surface water and groundwater sampling; and
- Provide key findings and recommendations regarding the use of flexible approaches for the Site Assessment Program when conducting Site Assessment activities.

The Executive Summary of the *Report* identifies the following “key findings:”

- Of the 43 States who responded to the previous Research Tool, 29 States (67%) indicated that they have flexibility to streamline the documentation process when providing EPA with PCS deliverables;
- Of the 29 responding States indicating flexibility in streamlining the document process, 25 States (86%) have a Superfund Site Assessment Program Cooperative Agreement (CA) with EPA;
- The States’ use of current tools to streamline the document process, particularly the PCS, PA, Combined PA/SI, and APA, indicate that these tools are being utilized frequently by States;
- There is a desire to have a sampling checklist for use as part of field sampling efforts;
- There is a strong desire to understand the available field screening tools for use in sampling efforts conducted as part of PCS activities.
- A majority of the responding States (67%) favor streamlining documentation to improve reports, and the presence of a CA does not appear to have a significant effect on this trend; and
- In general, State responses indicated that the biggest area with “room for improvement” is related to communication between EPA and the States. States indicated that they wanted better and timelier interactions with EPA as many felt uninformed on updates and process improvements. Following communication, States indicated that they thought having more flexibility with EPA’s processes and corresponding reports would allow States to treat each site differently on a site-specific basis and not treat them as a “one size fits all” requirement.

Recommendations are identified as:

- Sharing of approaches utilized by different EPA Regions and States for the Site Assessment Process including the example documents and/or templates provided as part of this report;
- Training and possibly policy clarification efforts to ensure that EPA Regions and States are aware of the options and flexibility available to them under the Site Assessment Program;
- EPA and the States should have an open and more frequent dialogue regarding available flexibility during the Site Assessment Program process to allow States to treat each site differently on a site-specific basis and where possible, not apply “one size fits all” requirements; and
- EPA and ASTSWMO should work together to inform EPA Regions and States of updated EPA guidance and policies offering flexibility during the Site Assessment Program process

A copy of the *Report* can be downloaded [here](#).