


Environmental Special Topics

Due Diligence Records Review

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Roll Call for District Offices.

Good afternoon and welcome to this Environmental Special Topics: Due Diligence in Records Review presentation. My name is Jakub Olesiak and I will be your instructor for this session. This presentation was developed to provide you with a brief primer on performing environmental records reviews to obtain information to enable you to determine whether contaminated soil, groundwater or materials may exist within a Department construction or maintenance project ROW. This is part of the Environmental Due Diligence (EDD) effort that the Department must complete as part of construction or maintenance projects. In cases of utilizing shoulder cuttings for clean fill the basic level of due diligence is a visual inspection unless there is known or considerable potential for contamination. If the fill does not pass visual inspection due to stained soil or evidence of dumping such as paint cans or 55-gallon drums a records review may be necessary. Records review may also be necessary in stockpile divestitures and lease agreements.

But please understand that this is intended to be an overview of where environmental records can be accessed and provide a simple example of one on-line search. The intent is to provide those within PennDOT that wish to perform with guidance, a list of resources to access various environmental information, some things to keep in mind through this database review, and an idea of how much time this requires.

A few housekeeping points that we want to remind you of. Please put any of your cell phones and your office phone on mute for the duration of this presentation. This is so that background noise does not disturb your colleagues. The Webex utility that you see on your screen has a number of functions. There are three icons which I want to identify for everyone. The first icon appears to be two people, which gives you a list of individuals in the web conference. The second is a chat box and that opens the chat function. If you have a question during the presentation you can either click the 'raise your hand' button and unmute your phone to ask the question or enter it into the chat box. Your question can be reviewed by me and others in this room, and allows us to determine whether to answer the question immediately, determine that the question will be answered in a subsequent slide, or whether we should address it at the end of the presentation.

Lastly, I want to remind you, if it has not already happened, to pass the sign-in sheet among the attendees. Please submit the filled out sign-in sheet to your training coordinator promptly after this training has been completed.

Now that we've taken care of those few housekeeping items....I know your time is important, so let's get started.

Records Review

Introduction

The purpose of the records review process is to conduct a paper study of the records which are practically reviewable*, as determined by the District and relevant to the project study area for indications of hazardous and environmentally sensitive waste(s), practice(s), or material(s). (Publication 281)



According to Publication 281 Waste Site Evaluation Procedures for the Highway Project Development Process:

Practically reviewable is defined in Publication 281 as “records that are readily available and pertinent to the investigation at hand”.

The records review process is an important part of due diligence. It provides a general snapshot of environmental concerns in an area, which in turn allows you to narrow in on specific properties and issues. As you may well know, it is also easy to be quickly inundated by the sheer volume of records that can be obtained for even a single site let alone a number of properties.

In the following slides we will give examples of regulatory databases, records used to identify site setting and history, as well as provide tips to make the process easier.

We are going to be summarizing both the records review lists for Management of Fill Policy and Phase I ESAs together; the specific review list for EDD related to Management of Fill is available in Appendix D of Publication 281 and Appendix C for Phase I site assessments. As I have mentioned earlier there will be specific situations where you may need to engage in records review.

Records Review

Records Review Process

- Site(s) Identification
- Detailed Note-taking
- Tips and What to Look For
- Records Review – Available Sources
- Conclusions - Further Investigation



First, before a records review is to be conducted, you have to identify the site(s) for which you are seeking information. This can be more difficult than it sounds. Therefore the first issue that we will be reviewing is site identification. We are going to summarize the different problems associated with identifying and searching for sites. This includes narrowing in on particular sites that appear to have more problematic histories and delineating spatial boundaries of concern in order to save valuable time and review potential contaminant migration from adjoining properties.

Our second topic will be the importance of detailed note-taking due to the considerable amount of information in the records review process. This will allow you to keep track of sites that have multiple aliases and narrow in on properties with clear issues. This will also help you keep track of databases and sources of records that have already been utilized, and document that you have followed recommended procedures specified in Publication 281 and the Management of Fill Policy.

Our third topic will be tips for the records review process and particular issues to look for. These are typically the common sources of contamination including: leaking underground storage tanks, service stations, facilities that produce hazardous wastes, dry cleaning facilities, and cleanup sites.

This will be followed by an overview of the various sources recommended in a records review due diligence in Publication 281.

Finally, we will reflect upon how this information will be interpreted and potentially suggest additional investigation or specific conclusions. Also, we will discuss how this data compliments the site visit and potential file review if warranted.

Records Review

Site Identification:

- Multiple names or site identification numbers
- Historic names of sites may differ from present names
- Property boundaries may overlap
- Spelling, address, or other database errors
- Ownership name or regulatory ID may differ from other identification



The difficulty with site identification is generally around how the property is identified within public records. We will provide an example later in this presentation that shows site identification issues and how they will affect your search.

Regulatory agencies may maintain site information under a number of alternative names or site identification numbers for a site in regulatory databases.

There is also the potential that historical sites may have different names, addresses, ownership, or regulatory ID. Sites may be identified by a historic name rather than a current one.

Typically, you may not only be reviewing one site, but also adjoining properties as they can potentially impact a number of surrounding properties. It is important to properly delineate site boundaries as historical boundaries may be different than current ones. It may be difficult to delineate what historic activities are inside or outside the area of concern.

Although it may sound strange it is very common for there to be errors in site spelling, address or site ID in records or databases which may make the process more difficult.

Finally current ownership may affect site information and regulatory ID.

Records Review

Note-taking

- Continue to update notes with new regulatory information identified including:
 - Present and past site names, aliases, identification numbers, addresses, etc.
- Mark potential sites where further investigation or file review may be warranted and identify additional information necessary



It is important to keep notes on all these alternative names, uses, historic ownership, and regulatory IDs. This will be useful while establishing a site history, conducting a file review, site investigation, and during reporting. Continue to update these notes when new information is identified.

In addition, a list of sites, potential concerns, and data gaps where more information is necessary will also be useful not only in the database review stage but also in the subsequent file review or site visit.

We should point out that your notes become part of the EDD record. The thoroughness of your efforts may be judged based on your notes which must be maintained for five years in the case of the Management of Fill Policy.

Records Review

Database and Records Review Tips

- Identify your site on a map
- Historical use information, if available, may inform site information in other regulatory review sections
- Use multiple iterations of site names, aliases, owner names, and identification numbers
- Database URLs change periodically
- Local governments, fire departments, and historical societies may have valuable information



Here are some tips to consider during the process.

You can use Google, Google Earth, Mapquest, or Bing Maps to identify a current street map and aerial photograph of your site. This will help you when comparing information from other spatial information reviewed in subsequent slides.

It is important to get historical use information early because this may identify previous operations on a specific site that can be investigated during subsequent portions of the database, records, or file review. Obtaining a full list of site names and aliases from current and historical information will help prevent you from repeating database or file reviews.

When conducting your database review, it is important to learn the functionality of the website, including case sensitivity and geographic functions. Different iterations of names and addresses may help. If no information is found by site name or identification number, you can search by location and identify the site on a long list or through spatially coded databases if this functionality is available. A zip code based search may result in a significant amount of site files. Internet Explorer allows you to search through long lists more rapidly through the drop-down menu "edit: find on this page" or control F.

The database URL information that is provided later in the presentation has a likelihood of changing over time. If you are conducting database reviews on a regular basis, then it will be important to keep up with these websites. If these URLs expire, you can search the appropriate US EPA or PA DEP section to find the desired database.

While it is easy to rely on databases, state and federal records, there can be a significant benefit to using local records. Sometimes, historical societies and local municipalities will have some of this information online but most likely in-person reviews are necessary. Instead of showing up at the county office, if you don't know what kind of historic records they have or how far they go into the historical record, call and ask. Local governments, often at the county level have online databases for title records. Sometimes, these records are privatized which means additional costs will be incurred.

Records Review

What to look for

- Publication 281 Section 4.0 has a comprehensive list of historic site activities and their potential waste or chemical product problems.
 - Hazardous Waste Cleanup Sites
 - Leaking Underground Storage Tanks (LUSTs)
 - Fueling, Service Stations, or Drycleaners
 - ACT 2 Cleanup Sites, Environmental Liens
 - National Priority List sites
 - Historic Waste Disposal Sites
 - Hazardous Waste Generators (LQG, SQG, CESQG)



Contaminated sites including hazardous waste cleanup sites and leaking underground storage tanks will often be in the databases provided. However, that does not suggest that all potential contamination has been identified by regulatory agencies.

Within the records review, the investigator should give special attention to hazardous waste cleanup sites, sites that have or have had storage tanks on site (e.g. service stations, fueling facilities, etc.), and look for any regulatory enforcement history or records of tank leakage, removal, and/or closure. This includes ascertaining whether there is an open claim on Pennsylvania's Underground Storage Tank Remediation Indemnification Fund (USTIF). Furthermore, the investigator should identify whether there are any environmental liens on the property, activity use limitations, there are nearby historic waste disposal sites, or if sites are presently hazardous waste generators – particularly sites that have a history of violations.

If no such public records exist, reviews of aerial photographs, titles, or Sanborn fire insurance maps may identify historic evidence of environmental impact that is not in the regulatory record.

Records Review

Publication 281 Recommended Phase I Checklist

- Federal Databases
- PA Databases
- Regional PA DEP Site Records
- Physical Sources Setting
- Historical Use Information



There are a number of sources available which can be utilized to find environmentally sensitive information. Federal Databases, PA Databases, Regional PA DEP Site Records, Physical Sources Setting, and Historic Use Information are general types of information recommended in Publication 281.

In the following slides we will review what specific sources are available in these databases and information types.

Records Review

Federal Databases – US EPA

- NPL Site List
 - <http://www.epa.gov/superfund/sites/npl/pa.htm>
- CERCLIS List
 - <http://www.epa.gov/superfund/sites/cursites/>
- Facility Index / Facility Registry System
 - http://www.epa.gov/enviro/html/fii/fii_query_java.html



National Priority List (NPL) (Superfund). The NPL is a subset of the Comprehensive Environmental Response, Compensation, and Liability Act, Information System (CERCLA, CERCLIS) that is maintained by the US EPA and identifies over 1,200 sites for priority cleanup due to hazardous waste contamination under the Superfund Program. Superfund sites are the worst of the worst as far as environmental cleanup is concerned and NPL sites may encompass relatively large areas.

CERCLIS as mentioned above, contains data on potentially hazardous waste sites that have been reported to the US EPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the CERCLA. The CERCLIS contains sites which are either proposed to be or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL. Sites are removed from NPL once appropriate remedial actions have been completed, whereas they are never removed from the CERCLIS.

Facility Index System (FINDS) / Facility Registry System (FRS) contain both facility information and 'pointers' to other sources that contain more detail. This includes a wide array of databases maintained by the US EPA on active sites and cleanup sites and retrieves selected facility data from 17 national systems. CERCLIS or Superfund Information System, Brownfields, AFS (Air Emissions), Integrated Data for Enforcement Analysis (IDEA), toxic release inventory system (TRIS), Safe Drinking Water Information System (SDWIS), Permit Compliance System (PCS), National Emissions Inventory (NEI), Resource Conservation and Recovery Act (RCRA Info), Toxic Substances Control Act (TSCA), and Emissions Inventory System (EIS).

Records Review

Federal Databases - continued

- RCRA TSD Facilities List (optional) – PA DEP Bureau of Waste Management
 - <http://www.portal.state.pa.us/portal/server.pt?open=514&objID=589612&mode=2>
- RCRA Generators List (optional) – US EPA
 - <http://www.epa.gov/enviro/index.html> EnviroFacts
 - <http://www.epa.gov/reg3wcmd/ca/pa.htm> (Corrective Action)
- ERNS List (optional) – US Coast Guard National Response Center
 - <http://www.nrc.uscg.mil/download.html>



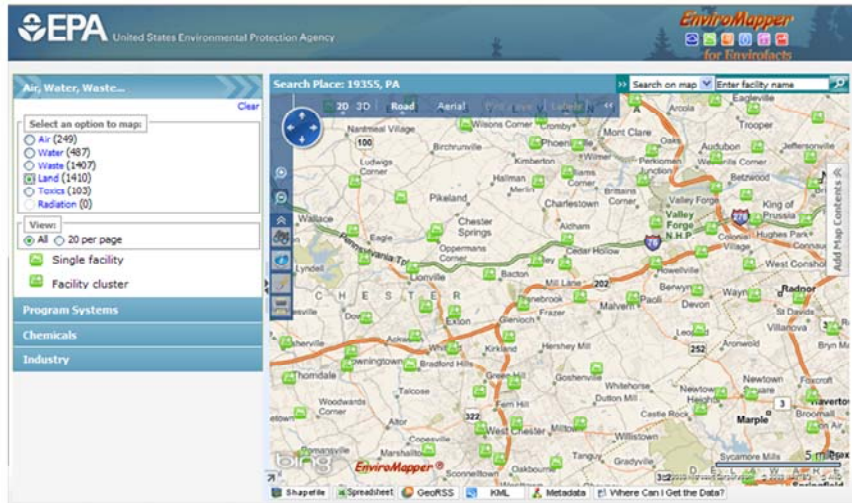
Resource Conservation and Recovery Act (RCRA) Treatment Storage and Disposal Facilities (TSD) for hazardous waste are identified in Publication 281 as federal database. I provided the URL for a state specific list is available through the PA DEP Bureau of Waste Management, Solid Waste Management Program. Since we are focusing on Pennsylvania it will be easier to reference this list than one related Federal Database.

For the RCRA Generators List I provided the information for EnviroFacts – which is a one-stop shop for a number of database searches including: CERCLIS or Superfund Information System, Brownfields, RCRA, AFS (Air Emissions), ECHO (Enforcement Compliance History Online)– Integrated Data for Enforcement Analysis (IDEA), Facility Registry System (FRS), ICR (Information Collection Rule), Toxic Release Inventory (TRI), and the Safe Drinking Water Information System (SDWIS). This can be quite useful in your records review process.

The following three databases are optional and the first two are likely to overlap with the Facility Registry System mentioned in the previous slide. Now the reason that the first two databases are referenced as optional is that they relate to facilities that generate or handle hazardous waste. There are certainly thousands of facilities across the USA that generate or handle hazardous waste that do so in compliance with applicable regulations. Because a facility generates or handles hazardous waste does not necessarily suggest that they dispose of it in an improper manner.

Emergency Response Notification System (ERNS) records and stores information on reported releases of oil and hazardous substances. ERNS records are maintained by the National Response Center, United States Coast Guard; and are available for download by year from 1982 forward. These Excel files are searchable by NRC Report Number, Calltype, Incident Date, Location County, City, State, Suspected Responsible Company, Type of Incident, Incident Cause, Medium Affected, and Material Involved. Scanning individual databases by year to determine if there was a spill incident in proximity to your site likely goes past what would be considered practically reviewable. Therefore this database is optional.

Records Review



US EPA EnviroMapper:

<http://www.epa.gov/emefdata/em4ef.home>



Envirofacts also has an EnviroMapper application where you can use spatial data to identify: Air Emissions (AIRS/AFS), Superfund Sites (CERCLIS), Toxic Releases Inventory sites (TRI), Hazardous Waste Facilities (RCRAInfo), Water Discharges (PCS), and Brownfields (ACRES). I have provided you with a direct link where you can search by zip code or other spatial information.

This slide shows the results of a search based upon our office zip code that I conducted in the URL that is linked above. As you can see on the left you have your choice of types of sites to look for. EnviroMapper will have spatially coded information but it will not have site details that you would find in EnviroFacts so it is best to use the two sites together in order to see facilities in an area and to obtain specific site details. In the EviroMapper application you can also use your mouse on the map to go into greater detail.

I will show you this quick on the website in order to make it more apparent.

Records Review

PA DEP Databases – Bureau of Waste Management

- Priority List / HSCA Remedial Action List – Environmental Cleanup Program
 - <http://www.portal.state.pa.us/portal/server.pt?open=514&objID=589565&mode=2>
- Operating Municipal Waste Landfills Lists – Solid Waste Management Program
 - http://www.portal.state.pa.us/portal/server.pt/community/solid_waste/14077/waste_generation_and_disposal_information/589707



Pennsylvania has a number of environmental databases including:

The PA Priority List is no longer operational so I have provided you with the Hazardous Sites Cleanup Act (HSCA). This database has a list of hazardous sites in Pennsylvania and is maintained by the PA DEP Bureau of Waste Management, Environmental Cleanup Program.

The Operating Municipal Waste Landfills List provides information for current municipal landfills. It is maintained by the PA DEP Bureau of Waste Management, Solid Waste Management Program. The URL I have provided also has links to Pennsylvania hazardous waste TSDFs, Municipal Waste Sites, and Residual Waste Sites.

Records Review

PA DEP Databases- continued

- Hazardous Waste Inventory - eFACTS
 - <http://www.ahs2.dep.state.pa.us/eFactsWeb/>
- Regulated UST List (optional) – Storage Tanks Program
 - <http://www.portal.state.pa.us/portal/server.pt?open=514&objID=589736&mode=2>
- Leaking UST List – Storage Tank Cleanup Program
 - <http://www.portal.state.pa.us/portal/server.pt?open=514&objID=589714&mode=2>

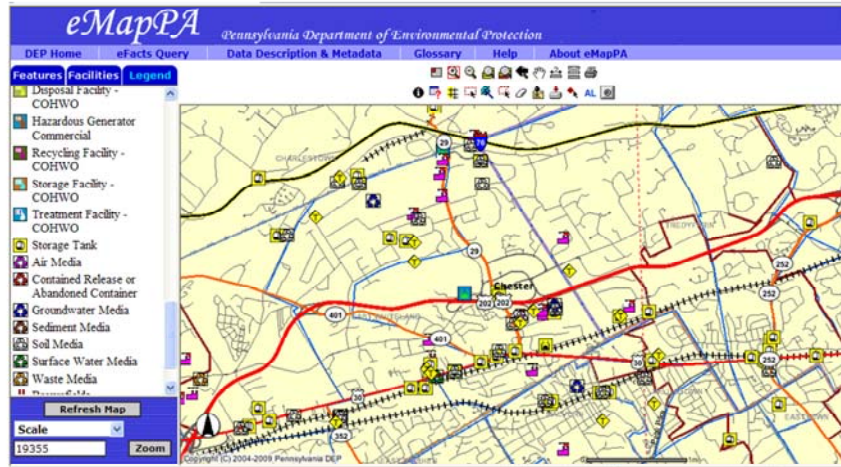


The PA DEP Environment, Facility, Application, Compliance Tracking System (eFACTS) is a searchable database that has information for all facilities that are regulated by the PA DEP. These include storage tank locations, residual waste operations, municipal waste operations, land recycling cleanup locations, EPA Toxic Release Inventory, Commercial Hazardous Waste Operations, and Brownfield Sites.

The Regulated tanks list is maintained by the PA DEP Bureau of Waste Management, Storage Tanks Program. This is an optional list because the facilities that are listed on it have regulated storage tanks, but this does not necessarily imply that they have related contamination.

The Leaking Underground Storage Tank (LUST) list is available as an excel file from the PA DEP, and it is updated regularly. When downloaded, you can search and sort the file under a number of variables. The file is maintained on the Storage Tank Program website.

Records Review



PA DEP eMapPA

<http://www.emappa.dep.state.pa.us/emappa/viewer.htm>



eMapPA is probably less intuitive and has less functionality than EnviroMapper but can provide your search with the same location-based details related to Envirofacts data in an area. Obtaining site-specific information with eMapPA is not possible, so it is good to use it in conjunction with eFACTS.

In order to search by zip code, look at the drop-down menu under the Refresh Map icon in the lower left-hand side of the screen. It will allow you to search by location in a pop up window which will open up. I will show you this quick on the website in order to make it more apparent.

If you look at the left side of the screen there are also tabs where you can have specific features on the map as well as a legend that identifies specific sites of concern. Again I searched for 19355 database near our office. We can see files for storage tanks, affected soil and groundwater media in the area.

Records Review

Regional DEP Site Records

- PA DEP Regional File Review
 - Contaminated Sites
 - Well and Groundwater Contamination Records
 - Emergency Release Reports
 - http://www.portal.state.pa.us/portal/server.pt/community/regional_resources/13769
- Remediation Projects (Land Recycling Program Act 2 Cleanup Sites)
 - http://www.portal.state.pa.us/portal/server.pt/community/program_results/10310



Hazardous Substances Control Act (HSCA), ACT 2, and Leaking Underground Storage Tank (LUST) lists mentioned in previous slides have information concerning contaminated sites. It is unlikely to be considerably detailed information, but rather it describes the facility, a contaminant of concern, and potentially the status of the site in relation to PA DEP actions (closed, in progress, etc).

Site-specific records from the PA DEP can be obtained by submitting a records review request to the appropriate regional office. Each regional office will have a link to contacting their records section to schedule a file review. To save time it may be worthwhile to schedule a file review in advance or on the day of a site visit or concurrently with visits to other local offices to obtain alternative records. I would suggest that this takes approximately three hours and you should bring a check to make copies. Your regional records review contact can tell you how many files you have for a specific site which will give you a better indication on scheduling with other records review or site visits.

Act 2 sites include Act 2 - Site Lists include: Completed Sites & In Progress, Engineering and Institutional Controls, Act 2 – Non-Use Aquifer Determinations (Excel). The first database is not searchable, but rather a long list indexed by counties. The latter two databases are in Excel files which you can search.

Records Review

Physical Setting Sources

- USGS 7.5 Minute Topographical Maps - USGS
 - [http://store.usgs.gov/b2c_usgs/usgs/maplocator/\(ctype=areaDetails&carearea=%24ROOT&layout=6_1_61_48&uiarea=2\)/.do](http://store.usgs.gov/b2c_usgs/usgs/maplocator/(ctype=areaDetails&carearea=%24ROOT&layout=6_1_61_48&uiarea=2)/.do)
- Soil Survey – USDA
 - <http://websoilsurvey.nrcs.usda.gov/app/>
- Groundwater Maps (optional) - PA DCNR
- Bedrock Geology Maps (optional)
- Surficial Geology Maps (optional)
 - <http://www.dcnr.state.pa.us/topogeo/pub/index.aspx>



Current topographic maps are available through the US Geological Survey. You can search by address and you will obtain a PDF Topographical Map.

The web soil survey is an application that can be used to determine soil characteristics in a specific area. It is maintained by the US Department of Agriculture. You can search by address, state and county, lat long, etc. The website allows you to create a PDF of the local soil characteristics. As a tip: make sure that your area of concern is large enough to be accurate.

The Pennsylvania Geological Survey has publications available concerning the geology and groundwater resources of a number of Pennsylvania counties. The PA Department of Conservation and Natural Resources makes this information available.

Records Review

Historical Use Information

- Aerial / Historical Photographs – Penn State University or PA Geological Survey Library
 - <http://www.pennpilot.psu.edu/>
 - <http://www.dcnr.state.pa.us/topogeo/library/index.aspx>
- Sanborn® Fire Insurance Maps
- Property Tax Files
- Recorded Land Titles
- Zoning / Land use records
- Local Street Directories
 - Local government (County, Municipality, Township), historical society, local library



PennPilot which is maintained by Penn State University has historic aerial photographs across Pennsylvania. Additional aerial photographs can be accessed through a file review at the PA Geological Survey Library which is in Middletown, PA.

Sanborn maps and other similar records may be available at the local library, historical society, or the municipality. Sanborn maps are particularly interesting because they provide a lot of historical information, in some cases going back to the late 1800s, in a very detailed form (fire insurance maps). They often have enough detail to identify historic land uses, including storage tanks, furnace locations, and material stored, etc.

It is important to determine which records are available at which locations. A few phone calls can often allow you to determine which historic information is available where. This will vary across county and municipality.

Land title, property tax information, and zoning / land use records are often available for order through a title service typically connected to a county website. There may be a fee for this service and typically this review is conducted by the PennDOT Right-of-Way for property acquisitions.

Local Street Directories are likely to be available at your local library.

Historical resource documents also include prior site investigations or other records of activity on the site that may potentially impact the environment.

Records Review

Conclusions & Further Investigation

- Prior reports from site owners: Phase I ESAs, Phase II, Tank Closure Reports, or other supplementary documentation
- File Review with the PA DEP or Freedom of Information Act (FOIA) request with the US EPA
- Potential concerns to focus upon during Site visits



Additional information can be made available by current site owners if these types of investigations have been conducted by environmental consulting firms on their behalf.

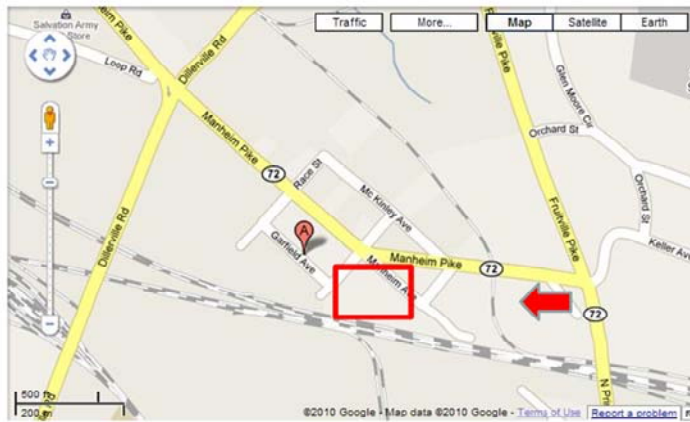
If they have had these studies conducted but are uncooperative in providing this information, some of these files may be available through file review if they were submitted to the PA DEP as part of a tank closure or remediation project.

Your online and records reviews should generally be conducted prior to your site visit as this information is meant to prepare you for your site visit;

- if there are multiple properties, which ones you should spend more time at;
- should you look for evidence of USTs including vent or fill pipes;
- is there stressed vegetation that would indicate contamination, or topographic anomalies that would provide evidence of dumping, are there transformers on site, etc.

Records Review

Example: Environmental Recovery Corporation 1076 Old Manheim Pike Lancaster, PA 17601



The example that we have selected for this presentation is a project in the vicinity of 1076 Old Manheim Pike, in Lancaster County. The first place I will generally look is Google map to identify the specific site location.

This is the site that we are acquiring or repairing a nearby road. As I can tell you from visiting the aforementioned site, the location of the A is actually not correct. The site is southeast of the A between the railroad and Old Mainheim Pike.

Records Review



Example:

**Google
Earth**

2010

This is the same location on Google Earth. The red box is approximately the same area as the prior slide. As I have mentioned before, even Google Earth is wrong.

This give us a better idea of the build-out in the area, whether it is residential, commercial or agricultural, etc.

This is also a 2009 or 2010 era photograph. Some of you may also be familiar with Google street view or Bing maps Birds-eye view, which is a function that you can also use to get a closer view.

Records Review



Example:

**Google
Earth**

1992



Google Earth will actually allow you to go back as far as sometimes 1982 aerial photographs. The function for historical aerials is located on the clock button at the top of the Google Earth Image. This is the same site, but with a 1992 photograph (you can see the clock highlighted at the top of the page) – all available on Google Earth

Within the red box, you can see above ground storage tanks in the lower right-hand corner, but flipping back to the 2010 map, the tanks are not there and it is an empty lot. There are also two buildings visible in the upper left-hand corner that are no longer in place. As we can see here on Google Earth the site is also listed as Lancaster Oil Co. and not Environmental Recovery Corporation.

This is the type of information we will see that will enable us to surmise that contaminated soil or other materials may exist at this location, and may have impact to the project.

Records Review

Example – Facility Registry System

Facility Registry System (FRS)
You are here: [ERA Home](#) [Envirofacts](#) [FRS](#) [Report](#)

Facility Detail Report

Report on Error

FRS

LANCASTER OIL CO
1062 OLD MANHEER ZONE
LANCASTER, PA 17603
EPA.Facility_ID: 110094596148

Legend

- Selected Facility
- EPA Facility of Interest
- State/Tribe Facility of Interest

The facility locations displayed come from the FRS Spatial Coordinates tables. They are the best representative locations for the displayed facilities based on the accuracy of the collection method and quality assurance checks performed against each location. The North American Datum of 1983 is used to display all coordinates.

Not Here

LANCASTER OIL CO

© 2011 Microsoft Corporation © 2011 NAVTEQ © AEG

bing

pennsylvania
DEPARTMENT OF TRANSPORTATION

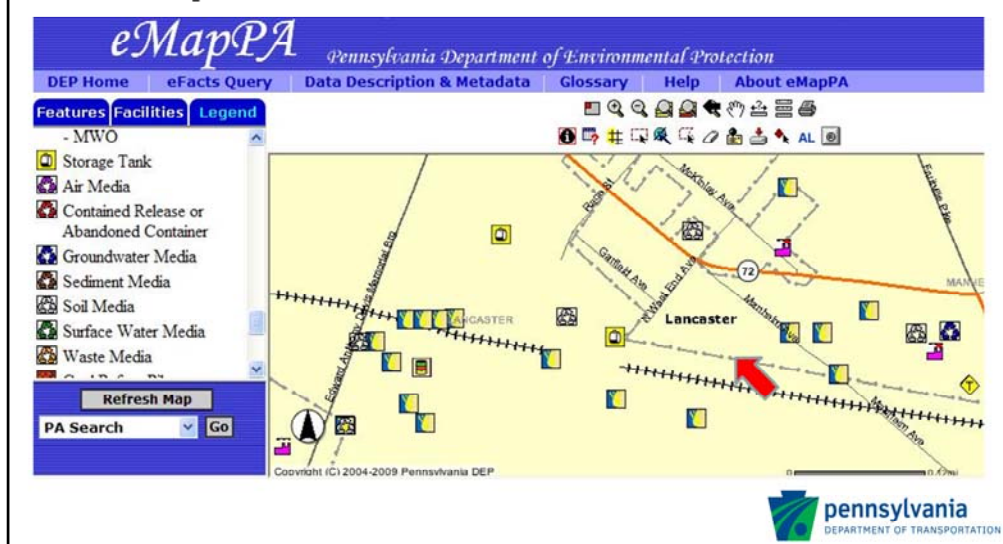
What is wrong with this picture?

When we conduct a search through the Facility Registry System the facility is listed not as Environmental Recovery Corporation but rather as Lancaster Oil Company which is a former facility name. The listing is at the correct address but at the wrong zip code, 17603. This means that EnviroFacts has geocoded the information at a completely different location.

A search by either facility name or by zip code through EnviroFacts would not have identified the facility. It also suggests that it can be valuable to use online mapping software first and cross reference regulator mapping systems with that information.

Records Review

Example – eFACTS



The PA DEP eFACTS eMapPA utility shows a number of concerns around the area including affected soil media and a storage tank in proximity based upon the legend on the left of the screen.

Records Review

eFACTS Database Search

Facility Search Results



Sort Order: Facility Name - ascending

Primary Facility (Facility ID)	Status	Program
LANCASTER OIL (596684) 1076 OLD MANHEIM PIKE LANCASTER, PA 17601 Manheim Township, Lancaster	Active	Land Recycling & Waste Management
LANCASTER OIL (597016) 1062 OLD MANHEIM PIKE LANCASTER, PA 17601 Manheim Township, Lancaster	Inactive	Land Recycling & Waste Management
LANCASTER OIL CO (596069) 1062 OLD MANHEIM PIKE LANCASTER, PA 17601 Manheim Township, Lancaster	Inactive	Land Recycling & Waste Management
LANCASTER OIL CO (596069) 1076 MANHEIM AVE LANCASTER, PA 17603 Manheim Township, Lancaster	Inactive	Land Recycling & Waste Management
LANCASTER OIL GP (550848) 1062 OLD MANHEIM PIKE LANCASTER, PA 17601 Lancaster City, Lancaster	Active	Land Recycling & Waste Management

<< < 1 of 1 > >> (5 records)

As we can see through the eFACTS database search there are multiple database entries for Lancaster Oil, but no Environmental Recovery Corporation, but at least they got the address correct.

As you can see each listing has a different site ID and status (inactive / active).

Records Review

Hazardous Waste Transporter List

LANCASTER OIL COMPANY DBA ENVIRONMENTAL RECOVERY CORPORATION OF PENNSYLVANIA
1076 OLD MANHEIM PIKE
LANCASTER, PA 17601

LICENSE # PA-AH 0679

LIC EXPIRES :04/30/2011
EPA ID # PAD987266749
PHONE # 717-393-2627

Site Search Details

Site Details

[South Central Regional Office](#)

[Site Search](#)

[Sites by County/Muni Search](#)

no paging

Site ID:	518981
Site Name:	LANCASTER OIL RECYCLER
Address:	1062 OLD MANHEIM PIKE LANCASTER, PA 17601
Status:	Active



The PA Hazardous Waste Transporter List was not mentioned in our database review it has some useful information in this case including the EPA ID which can be used in Envirofacts to identify the site property.

eFACTS listing shows Lancaster Oil Recycler not Lancaster Oil Company or Environmental Recovery Corporation.

Records Review

eFACTS Database Search

Facility Search Tank Remediation

Incident Name	Confirmed Release Date	Type	Cleanup Status	Cleanup Status Date
CONTAMINATION WAS OBSERVED DURING THE DECEMBER 1998 CLOSURE PROJECT FOR THE 5 USTS. (40425)	12/07/1998	UST (Petroleum)	Interim Remedial Actions Initiated or Completed	12/18/1998

Tank Remediation Search Details

No records matched the criteria.

Tank Remediation Search Milestone Details

Milestone Name:	Milestone Event Date:	Milestone Due Date:	Milestone Status:	Milestone Response Date:
BG/SW Site Char. Report Received - Background/Statewide	08/24/1999		Disapproved Citing Deficiencies	09/17/1999



Within eFACTS after reviewing a number of specific files, some issues were identified in relation to a tank closure, which is visible on the map in a previous slide. While it identified interim remedial actions as having been initiated or completed, the second file indicates that while the site characterization report was received it was disapproved.

We can assume from this that there may be some further investigation necessary to determine if the soil is contaminated. You may want to conduct a file review with the PA DEP or request files from the site owner to properly determine the extent of this potential contamination

Records Review

Example Summary

- **Time frame will depend upon amount of records**
- **Questions:**
 - What was different between individual records reviewed in this example?
 - What conclusions may we be able to draw from the example?



While I have gone over this in just a few slides the whole process of reviewing all these separate databases took a few hours.

So I am going to ask specific districts what they observed from this example. Feel free to answer the question by un-muting your phone or through the text box provided by webex.

If we review the example we can see that there were quite a few inconsistencies in site names, historic names, site locations, often representing database entry errors.

Tanks were removed in the late 90s, contamination was observed, their removal was not approved, the site may require further investigation. The site is also on the hazardous waste transporter list.

As we have seen there are numerous databases available on line and other local resources that we can use to identify the potential for a regulated substance to exist on a property and whether there is a chance to impact the PennDOT project. Much of this information discovered is non-definitive, suggesting additional investigation is necessary to determine whether soil or groundwater impact currently exists within the project site.

So, have we completed sufficient due diligence? Is it sufficient enough to say that the project will not be affected by contaminated materials handling during construction? As much as I hate to state this, the answer of whether we've done enough is still, "Yes and no". We have discovered that the potential exists to warrant further investigation. And depending on the PennDOT project needs, this further investigation may, or may not conclude the research.

Records Review

Summary

- Site Identification Issues
- Detailed Note-taking
- Understanding Specific Issues to Look for
- Using Available and Easy to Access Resources
- Focusing on Conclusions and Further Investigation

Housekeeping



A records review may be necessary in specific circumstances. In cases of utilizing shoulder cuttings for clean fill the basic level of due diligence is a visual inspection unless there is known or considerable potential for contamination. If the fill does not pass visual inspection due to stained soil or evidence of dumping such as paint cans or 55-gallon drums a records review may be necessary. Records review may also be necessary in stockpile divestitures and lease agreements. This presentation has been delivered to demonstrate an appropriate level of environmental due diligence during this process.

We have explored a number of concerns related to site identification throughout this presentation including historical issues, as well as inconsistencies in regulatory databases.

By keeping detailed notes and cross referencing the multiple resources that we have outlined today you can typically identify the records that you are looking for.

After you have identified the appropriate records, focus on specific issues that provide evidence of contamination including (LUSTs, Environmental Liens, Remedial Action, Historic Activities, etc).

Along with the site visit and any other further investigation you should be able to determine potential sources of site contamination if any exist.

Housekeeping: Before we get to Q&A, I would like to thank everyone for attending and the Design Community Training Program for sponsoring this training session. Please remember to submit sign in sheets to your training coordinators. We would like to encourage you to submit feedback forms for this presentation to provide suggestions and help us improve this presentation as well as comment on things that you did or didn't like.

Records Review

Q&A



P:\penndot shared\Webinars\Environmental Special Topics

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If anyone has conducted a records review in the past, how have your experiences differed? Do you have any tips or suggestions from personal experience.

If you have any specific questions related to anything in this presentation you can contact the Pollution Prevention Section.

I want to thank you for your time. I also want to mention that the speaker notes and handouts for this presentation are posted on the shared drive, under webinars and environmental special topics.

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Federal Databases

- NPL Site List
 - <http://www.epa.gov/superfund/sites/npl/pa.htm>
- CERCLIS List
 - <http://www.epa.gov/superfund/sites/cursites/>
- Facility Index / Facility Registry System
 - http://www.epa.gov/enviro/html/fii/fii_query_java.html
- RCRA TSD Facilities List (optional)
 - <http://www.portal.state.pa.us/portal/server.pt?open=514&objID=589612&mode=2>
- RCRA Generators List (optional)
 - <http://www.epa.gov/enviro/index.html> EnviroFacts
 - <http://www.epa.gov/reg3wcmd/ca/pa.htm> (Corrective Action)
- ERNS List (optional)
 - <http://www.nrc.uscg.mil/download.html>
- EPA EnviroMapper:
 - <http://www.epa.gov/emefdata/em4ef.home>

Pennsylvania Databases

- Priority List / The HSCA Remedial Action List
 - <http://www.portal.state.pa.us/portal/server.pt?open=514&objID=589565&mode=2>
- Operating Municipal Waste Landfills Lists
 - http://www.portal.state.pa.us/portal/server.pt/community/solid_waste/14077/waste_generation_and_disposal_information/589707
- Hazardous Waste Inventory
 - <http://www.ahs2.dep.state.pa.us/eFactsWeb/>
- Registered UST List (optional)
 - <http://www.portal.state.pa.us/portal/server.pt?open=514&objID=589736&mode=2>
- Leaking UST List
 - <http://www.portal.state.pa.us/portal/server.pt?open=514&objID=589714&mode=2>
- eMapPA
 - <http://www.emappa.dep.state.pa.us/emappa/viewer.htm>

Regional DEP Site Records

- PA DEP regional file review
 - http://www.portal.state.pa.us/portal/server.pt/community/regional_resources/13769
- Remediation Projects (Land Recycling Program Act 2 Cleanup Sites)
 - http://www.portal.state.pa.us/portal/server.pt/community/program_results/10310

Physical Setting Sources

- USGS 7.5 minute topographical maps
 - [http://store.usgs.gov/b2c_usgs/usgs/maplocator/\(ctype=areaDetails&carearea=%24ROOT&layout=6_1_61_48&uiarea=2\)/.do](http://store.usgs.gov/b2c_usgs/usgs/maplocator/(ctype=areaDetails&carearea=%24ROOT&layout=6_1_61_48&uiarea=2)/.do)
- Soil Survey
 - <http://websoilsurvey.nrcs.usda.gov/app/>
- Groundwater maps (optional)
- Bedrock geology maps (optional)
- Surficial geology maps (optional)
 - <http://www.dcnr.state.pa.us/topogeo/pub/index.aspx>

Historical Use Information

- Aerial / Historical Photographs
 - <http://www.pennpilot.psu.edu/>
 - <http://www.dcnr.state.pa.us/topogeo/library/index.aspx>
- Sanborne® Fire Insurance Maps
- Property Tax Files
- Recorded Land Titles
- Local Street Directories
- Zoning / Land use records
 - Local government (County, Municipality, Township), historical society, local library