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**TITLE:** Guidance for Establishing the National Priorities  
List

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3. Title GUIDANCE FOR ESTABLISHING THE NPL					
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEB 2 1982

OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSE

OSWER Directive 9320.1-01

MEMORANDUM

SUBJECT: Guidance for Establishing the National Priorities List

FROM: William N. Hedeman, Jr., Director *William N. Hedeman*  
Office of Emergency and Remedial Response

TO: Superfund Coordinators  
Regions I-X

Introduction

The announcement of the Agency's Interim Priorities List on October 23, 1981, marked a milestone in the implementation of CERCLA. In addition to defining targets for early Superfund action, the interim list gave us an opportunity to establish working relationships with the States and provided valuable experience for implementing the expanded priorities list mandated under CERCLA. The quality and timeliness of the work and the spirit of cooperation demonstrated by the States and Regions was impressive. I request that you express to the States our appreciation for the excellent work they did in support of the interim list and solicit their continuing cooperation in compiling the National Priorities List.

In order to develop a National Priorities List of at least 400 sites, it is essential that the Regions and States continue the work of identifying candidates and evaluating them. This guidance describes the plan for the initial steps for establishing the National Priorities List and provides detailed guidance on our short-term objectives.

OERR is continuing work on the the Hazard Ranking System as a component of the National Contingency Plan (NCP). We are currently reviewing the results of scoring for the interim list and will revise the scoring system where appropriate. However, it is extremely important to note that we foresee no major changes in the data required to rank sites. Consequently, the States and Regions should proceed to develop data needed to score sites.

data exist. Rather, a list of candidate sites will provide the basis for planning field work to be conducted during the next few months, as discussed in the next section.

A national total of approximately 800 candidates, roughly three times the number submitted for the interim list, is desirable. Based on our analysis of national site inventories, the anticipated Regional totals would be: Region I, 70-75; Region II, 100-110; Region III, 85-90; Region IV, 100-110; Region V, 140-150; Region VI, 95-100; Region VII, 45-50; Region VIII, 30-35; Region IX, 70-75; Region X, 25-30. However, these are not Regional quotas, and there is no specified minimum or maximum number of sites that a Region or State should identify as candidates.

The States and Regions should identify and list the candidates by February 19, 1982. Sites identified after that date will also be considered, but you should identify as many candidates as possible by the deadline. Reporting of the results to Headquarters is discussed in a later section.

#### Inventory of Data

The Agency is requesting that each State inventory available information on the candidates, identifying those areas where further investigative work is needed. These inventories will form the basis for EPA/State work plans for site investigations to support the priorities list. For your convenience, we have attached a checklist of the data needed to calculate Hazard Ranking Scores. It may not be necessary to obtain all data elements to accurately rate a site since in many cases only one pathway is involved. However, data relevant to direct contact and fire/explosion hazards should be included where appropriate.

#### EPA/State Work Plans

As soon as possible after the data inventories have been completed, the Regions should meet with each State to develop a plan for acquiring the data necessary to set priorities. The plans will include estimates of the resources needed, scheduling, and division of responsibility between the Region and State. The purpose of the work plans, beyond establishing responsibility for investigations, is to facilitate allotment of resources (e.g., FIT subcontracting, lab contractors, etc.) and scheduling.

#### Reports to Headquarters

Since the purpose for requesting States to identify candidates and cooperate in developing work plans is to ensure that resource allocations and scheduling are reasonable, Headquarters is requesting only summary information from the Regions. You should report the following items on a State-by-State basis to me by March 5, 1982: number of candidates;

NATIONAL PRIORITIES LIST  
CHECKLIST OF DATA REQUIREMENTS

Site Name: \_\_\_\_\_

Notes: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

<u>DATA ELEMENT/PATHWAY</u>	<u>Available</u>	<u>Not Appropriate</u>
<u>Ground and Surface Water and Air</u>		
1. Waste physical state	_____	
2. Persistence	_____	
3. Toxicity	_____	
4. Quantity	_____	
<u>Ground Water</u>		
1. Monitoring data OR		_____
la. Depth of aquifer	_____	
lb. Net precipitation	_____	
lc. Permeability	_____	
2. Ground water use	_____	
3. Distance to nearest down- gradient well	_____	
4. Population served by wells within 3 miles	_____	
<u>Surface Water</u>		
1. Monitoring data OR		_____
la. Slope and terrain	_____	
lb. Rainfall intensity	_____	
lc. Distance to surface water	_____	
ld. Flood potential	_____	
2. Surface water use	_____	
3. Critical habitats	_____	
4. Population served	_____	
<u>Air</u>		
1. Monitoring data		_____
2. Waste reactivity	_____	
3. Incompatibility	_____	
4. Toxicity	_____	
5. Distance to nearest population	_____	
6. Population within 1 mile	_____	
7. Critical environments	_____	
8. Land use	_____	