NEIC

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MULTI-MEDIA PRIORITY RANKING OF SELECTED FEDERAL FACILITIES

PUGET SOUND

May 1989

National Enforcement Investigations Center, Denver

U.S. Environmental Protection Agency

Office of Enforcement

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF ENFORCEMENT AND COMPLIANCE MONITORING

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Joel K. Mattern

NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
Denver, Colorado

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INTRODUCTION

EPA Region X, the Puget Sound Water Quality Authority (Authority) and the Washington Department of Ecology (Ecology), requested November 1988 that the National Enforcement Investigations Center (NEIC) rank Puget Sound area federal facilities according to their relative potential for having environmental problems.* These facilities were ranked using a modified version of NEIC's Multi-Media Priority Ranking Model which has been successfully used to rank federal facilities in the various EPA Regions.

Facilities are ranked using environmental rating criteria based on the type and magnitude of activities in the various media which actually or potentially could cause environmental contamination [Table 1]. These activities include past and present hazardous waste** generation and management, wastewater discharges, air emissions, and hazardous and toxic materials handling and storage. To rate the Puget Sound facilities, additional environmental criteria related to the Puget Sound Water Quality Management Plan were estabiished. These criteria address stormwater/nonpoint runoff, sediment contamination, natural resources/wetlands/shellfish, industrial pretreatment, spills, pesticides use, and compliance with environmental statutes and regulations.

Rating points for new environmental rating criteria were assigned by regulatory and enforcement personnel from EPA, Ecology, and the Authority who are the most knowledgeable about the status of various environmental conditions at each of the Puget Sound federal facilities.

The facility rating is not compared with any fixed number to indicate whether the installation is environmentally "good" or "bad." Rather, the rating indicates whether there is the potential, when compared with other installations, for major environmental problems (i.e., the higher the rating the greater the potential for environmental problems at the facility and, thus, further evaluation may be warranted).

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* *Environmental problems, as generally used here, are directly related to the release of contaminants and habitat degradation.*

** *As defined in 40 CFR 261*

Table 1

PUGET SOUND FEDERAL FACILITY ENVIRONMENTAL RATING CRITERIA

	Hazardous Waste Management[1]					Site Contamination			
Rating	Quantity Generated (m tons/Year)	Storage Capacity (gal.)	Treatment Capacity (gal./day)	Disposal Capacity: Landfill (acres-ft.)	Disposal Capacity: Land Application (acres)	Seriousness	Soil/Water Contamination	Sediment Contamination	Bulk Storage of Hazardous Material
0	0	0	0	0	0	No[2]	No[2]	No	No[2]
1	<12	<10,000	<1,000	-	-	-	-		-
2	12-50	10,000-100,000	1,000-50,000	-	-	Low or suspected[3]	Potential or suspected[3]		Known
3	50-500	>100,000	>50,000	≥5	<10	Medium or unknown	-	Potential or suspected	-
4	500-50,000	-	-	≥5	≥10	High	-		-
5	>50,000	-	-		-	NPL[4]	Known[5]	Known	-

	Wastewater Discharges[6]				Toxic Substances		Air Emissions			Water Supplies
Rating	Flow Rate (mgd)	SIC[7] Toxicity Group	On-base Industrial[8] Pretreatment	Suspected Toxic Discharge	PCB Use	Pesticide Use (lbs/year)	Number of Criteria Pollutants[9] Discharged at ≥100 Tons Per Year	Discharge to Nonattainment Areas	Suspected Hazardous Air Pollutant[10] Discharges	No of Persons Supplied
0	No[2]	<3	No industrial waste generated	No[2]	No[2]	0	No[2]	No[2]	No[2]	No[2]
1	-	-	Wastes generated	-	-	<250	0[11]	-	-	<1,000
2	< 5	-	but pretreated	Suspected[3]	Suspected[3]	250-500	1	-	-	≥1,000
3	.5-1 5	≥3	Wastes pretreated but	Known	-	500-2,500	2	1[12]	-	-
4	1.5-2 5	-	with potential problems	-	Known	2,500-5,000	>2	2[13]	Yes	-
5	>2.5	-	Wastes generated with no pretreatment	-	-	>5,000	-	>2	-	-

Table 1 (cont.)

PUGET SOUND FEDERAL FACILITY ENVIRONMENTAL RATING CRITERIA

	Stormwater/Nonpoint Runoff			Natural Resources/ Wetlands/Shellfish[14]		Compliance with Environmental Statutes and Regulations	Spills[15]
Rating	Area of Impervious Surfaces (acres)	Potential Contamination (No. of sources)[16]	Collection/ Treatment (percent)	Extent Inventoried[17]	Protection Program	Degree of Noncompliance[18]	Spills[19]
0	0-10	0	95-100	All	Yes	No known	No spills, good response capabilities and BMPs
1	10-25	1	75-95	-	-	-	-
2	25-50	2	50-75	Partial	Partial[20]	-	-
3	50-100	3	25-50	-	-	One NOV[21]	Reported spills, fair response capabilities and BMPs
4	100-250	4	5-25	-	-	Minor[22]	-
5	>250	>4	0-5	None	None	Major[23]	Reported/suspected spills, no response capabilities or BMPs

1. *The minimum rating for any facility generating hazardous waste, regardless of any storage, treatment or disposal activities is 3. Facilities with RCRA storage, treatment and/or disposal activities are assigned subcategory ratings, as indicated in the table. An additional point is added to facilities if they are both a generator and TSD (see text)*
2. *No = No known or suspected activity in this activity category or subcategory*
3. *Suspected means that information suggests nonspecific activity in the subcategory.*
4. *NPL means the facility is listed or has been proposed for listing on the National Priorities List.*
5. *Facilities with known or potential contamination of drinking water supplies are assigned two additional rating points (total of 7)*
6. *Includes known discharges to municipal wastewater treatment plants*
7. *SIC Toxicity Group [a number from 1(lowest) to 5(highest)] is an indication of potentially harmful health effects related to a specific Standard Industrial Classification (SIC) code (see text)*
8. *Industrial wastes include any waste which is not domestic or noncontact cooling water.*
9. *As defined in 40 CFR 50*
10. *Hazardous air pollutant (40 CFR 61) emission sources with or without other air sources*
11. *Facility has point source emissions but does not have the potential to discharge at ≥100 tons per year per pollutant*
12. *Facility discharges one nonattainment pollutant in nonattainment area for that pollutant*
13. *Facility discharges two nonattainment pollutants in nonattainment area for those pollutants*
14. *A rating of 0 should be given to any facility where no natural habitat exists. Where natural habitat does exist, it is assumed that the absence of a habitat inventory or protection program represents a risk to that resource.*
15. *Rating is based on the frequency of spills, the facility's ability to respond to spills, and the best management practices (BMPs) being implemented to prevent spills (including an updated SPCC plan).*
16. *Sources of potential contamination could include hazardous material storage, munitions handling/storage/repair, aircraft maintenance/operations, ship repair/building, vehicle maintenance, and residential/agricultural uses.*
17. *The more acres of non-inventoried habitat the higher the rating.*
18. *May receive rating points for noncompliance in each media.*
19. *Rating points are doubled for total rating.*
20. *Indicates the presence of some natural resources that are not fully covered by a habitat protection program.*
21. *Any notice of violation (NOV) issued over the last 5 calendar years*
22. *More than one notice of violation issued over the last 5 calendar years.*
23. *Failed to comply with Administrative Order.*

METHODS

The following nine federal facilities located in the Puget Sound area were selected for prioritization:

1. Defense Fuel Supply Point, Mukilteo
2. Fort Lewis
3. McChord Air Force Base
4. Naval Submarine Base, Bangor
5. Naval Supply Center, Manchester
6. Naval Undersea Warfare Engineering Station, Indian Island
7. Naval Undersea Warfare Engineering Station, Keyport
8. Puget Sound Naval Shipyard, Bremerton
9. Whidbey Island Naval Air Station

The above facilities are ranked using environmental rating criteria based on the type and relative level of activity in the following 10 categories:

1. Hazardous waste management
2. Site contamination (known and potential)
3. Wastewater discharges
4. Toxic substances, including polychlorinated biphenyls (PCBs)
5. Air emissions
6. Drinking water supplies
7. Stormwater/nonpoint runoff
8. Natural resources/wetlands/shellfish
9. Permit compliance
10. Spills

The above categories generally reflect pertinent activities regulated by one or more of six Federal environmental statutes and one or more of three Washington State environmental statutes: Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response Compensation and Liability Act (CERCLA), Clean Water Act (CWA), Toxic Substances Control Act (TSCA), the Clean Air Act (CAA) and the Safe Drinking Water Act (SDWA), Water Pollution Control Act (WPCA), State Environmental Policy Act (SEPA),

and the Shoreline Management Act (SMA), respectively. An explanation on how facilities are ranked in each category follows.

HAZARDOUS WASTE MANAGEMENT (RCRA)

This category ranks facilities according to the potential for environmental contamination through hazardous waste generation and management. For rating purposes, the category is divided into four activity subcategories: (1) Hazardous waste quantity generated, (2) waste storage design capacity, (3) waste treatment design capacity, and (4) waste disposal design capacity. These general subcategories are used because this information is readily available and covers a wide range of hazardous waste management activities.

The major information source for this category is the EPA Hazardous Waste Data Management System (HWDMS), a computer database which includes information submitted by hazardous waste generation and/or handling facilities as part of RCRA Part A and/or Part B permit applications. The data includes hazardous waste quantities and types generated, types of hazardous waste handling activity and waste processes design capacities. Information is obtained from Region RCRA files if the computer database is incomplete.

The minimum rating for any facility generating hazardous waste is 3 [Table 1]. This accounts for activities involving actual generation and any short term or small quantity management of waste. Generating facilities with RCRA storage, treatment or disposal activities are rated according to the relative level of activity in each subcategory. An additional rating point is assigned to these facilities to account for potential problems involved in the actual waste generating process(es).

Subcategory ratings and any additional rating points are combined to provide the overall rating for each facility for "Hazardous Waste Management" [Table 2]. For example, a facility generating 12 metric tons of hazardous waste annually, having 10,000 gallons of container storage capacity and 1,000 gallons per day tank treatment capacity, using the rating criteria [Table 1], receives 2 rating points for waste quantity generated, 2 points for storage, 2 points for treatment, and 1 point for being both a waste generator and TSD

facility [Table 1, footnote 1] or 7 points total for hazardous waste management. This ranking indicates the relative potential to contaminate the environment through hazardous waste management.

SITE CONTAMINATION (INCLUDING CERCLA)

This category ranks facilities according to the actual, suspected, or potential for site contamination from either past operations or the present bulk storage of hazardous materials (acids, fuel oil, gasoline, etc).* The category is divided into four activity subcategories: (1) Seriousness of site contamination problems, (2) contamination of soil and water, (3) sediment contamination, and (4) bulk storage of hazardous materials.

Information was obtained from the following EPA computer data bases: FINDS, Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS), and the Compliance Data System (CDS). Region file information supplemented this data. FINDS lists all known or suspected facility sites which were contaminated from past activities. CERCLIS tracks these sites and identifies those which are proposed for, or listed on, the National Priority List (NPL). Region files contain reports of any EPA/State or Department of Defense site investigations (such as preliminary assessments) for the suspected CERCLA sites. Preliminary Assessment and Installation Restoration Program reports rate the "seriousness" of site problems as low, medium or high and, if known, indicate the type of site contamination (soil, water). Information on sediment contamination was derived from the collective knowledge of federal and state personnel familiar with dredging or sediment sampling activities that may have been conducted at each facility. CDS lists installations with bulk storage facilities for hazardous materials (fuel oil, gasoline) through its inventory of volatile organic air emissions.

Rating points are assigned to each facility for activity in each of the four subcategories using Table 1. Facilities with known contamination of drinking water supplies are assigned two additional rating points. The sum of these

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* *Even though the handling of bulk quantities of hazardous materials may not be regulated by CERCLA, it is included here because of its potential for site contamination.*

ratings is the facility's overall rating for "Site Contamination" and is presented in Table 2.

WASTEWATER DISCHARGES (CWA)

This category rates facilities according to the actual or potential impacts of wastewater discharges into receiving waters. The four subcategories used to rate facility activity in this category are: (1) average daily flow rate; (2) the Standard Industrial Classification (SIC)* code for the facility's waste generating activities and general wastewater type (industrial, sanitary, or both); (3) on-base industrial pretreatment; and (4) suspected discharge of toxic wastewater.

Information on the type and flow rate of wastewater discharges was obtained from the Permit Compliance System (PCS) and Region NPDES files. SIC codes and toxic discharge information for each facility are from the EPA databases and/or Region files. SIC codes are used to assign each facility to a SIC toxicity group. Each SIC toxicity group from 1 (lowest) to 5 (highest) correlates to the potential for harmful effects from wastewater discharges from a specific industry (as identified by the SIC code). The SIC Code/Toxic Pollutant Discharge Potential component of the NPDES permit ranking system used by EPA nationally to classify dischargers as "major" or "minor," is used to assign a SIC toxicity group to wastewater discharge facilities being ranked. Information on industrial pretreatment was derived from federal and state pretreatment coordinators who are familiar with waste handling operations at each facility.

Facilities were assigned a rating score of 0 if no industrial wastes** are generated [Table 1]. If industrial wastes are generated, but are pretreated before discharge to a treatment plant or landfill, the facility received a score of 1 or 2 (depending on the quantity of waste generated). If facilities pretreat industrial wastes and there are known or suspected problems with the pretreatment process, scores of 3 or 4 were assigned depending on the quantity generated. Facilities that generate industrial waste, and have no pretreatment

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* *The SIC is a number which describes an industry by the type of activity in which it is engaged.*

** *Industrial wastes include all wastes that are not domestic wastes or non-contact cooling water.*

of those wastes before they are sent to a treatment plant or landfill received scores of 5. Facilities known or suspected of discharging toxic wastewater are assigned additional rating points. Flow rates, general wastewater type, SIC toxicity group number, and suspected discharge of toxic wastewater are used as shown in Table 1 to assign ratings to each facility in each subcategory. Subcategory ratings are totaled to obtain the wastewater discharge ratings presented for each facility in Table 2.

TOXIC SUBSTANCES INCLUDING PCB STORAGE AND USE (TSCA)

This category rates facilities according to information regarding use of PCBs and pesticides. Information sources used to identify facilities storing/ using PCB compounds included: HWDMS, FINDS and Region files (including the A-106 database). Facilities are rated according to Table 1. Pesticide use information was derived from a report recently completed for EPA Region X titled Pesticides of Concern in the Puget Sound Basin, A Review of Contemporary Pesticide Usage. This report lists pounds of pesticide active ingredients that are applied each year by Department of Defense facilities located in Puget Sound counties. Facilities are rated according to pesticide usage ranging from less than 250 pounds per year (scored as 1 point) to greater than 5,000 pounds per year (scored as 5 points) [Table 1]. Category ratings for each facility are presented in Table 2.

AIR EMISSIONS (CAA)

This category rates facilities according to: (1) the number of criteria air pollutants (particulates, nitrous oxides, sulfur oxides, carbon monoxide, and volatile organic carbons) emitted through point sources; (2) emissions of hazardous pollutants; and (3) emission of pollutants into nonattainment areas, as shown in Table 1. The 100-tons-per-year rate for criteria air pollutants is used in the rating because that is the emission rate normally used to differentiate between major and minor point air emission sources. Facilities with point air emission sources, which do not have the potential to emit any criteria pollutants at greater than or equal to 100 tons per year, were given a ranking of 1 for that subcategory. Additional ranking points are assigned facilities which discharge hazardous air pollutants and/or emit nonattainment

pollutants into nonattainment air quality control regions for that pollutant. No attempt is made to incorporate fugitive emissions into the rating system.

Information on emission rates was obtained from the Compliance Data System (CDS), an EPA computer database containing information on permitted point air emission sources and Region files. Facilities are rated quantitatively according to Table 1. Results for each facility are presented in Table 2.

SAFE DRINKING WATER ACT (SDWA)

This category rates a facility's potential impact according to: (1) whether it handles its own drinking water supplies, and (2) the size of the population served by the facility. Information is obtained from the Federal Reporting Data System (FRDS), Public Water Source data. Table 1 identifies how the rating points are assigned.

STORMWATER/NONPOINT RUNOFF (CWA, WPCA)

The three subcategories used to rate facility activity in this category are: (1) area of impervious surfaces located on the facility, (2) number of sources of potential contamination, and (3) the presence and effectiveness of stormwater collection/treatment systems at the facility. Sources of potential contamination that were used to establish the relative rating of each facility include hazardous material storage, munitions handling/storage/repair, aircraft maintenance/ operations, ship repair/building, vehicle maintenance, and residential/ agricultural uses.

Information regarding stormwater/nonpoint runoff was derived from the collective knowledge of federal and state personnel familiar with facility operations, including personnel responsible for writing NPDES permits.

Rating points were assigned to each facility for activity in each of the three subcategories using Table 1. Area of impervious surfaces was rated according to a scale ranging from 0 to 10 acres (0 points) to greater than 250 acres (5 points). A facility's potential for contamination was rated according to the number of sources of contamination present (5 points were awarded to

facilities with greater than four potential sources of stormwater contamination). If a facility has no means of collecting or treating stormwater, it was given an additional 5 points. Facilities with partial means of collecting and/or treating stormwater/nonpoint runoff were rated by percentage collected and/or treated [Table 1].

NATURAL RESOURCES/WETLANDS/SHELLFISH (SEPA, SMA)

The two subcategories used to rate facility activity in this category are: (1) extent facility has inventoried natural resources, and (2) the existence of a protection program for existing natural resources. Information on natural resources, including the presence of wetlands and shellfish beds, was derived from the collective knowledge of federal and state personnel familiar with the environmental resources present at each facility.

Facilities were rated according to Table 1. A facility was given a rating of 0 if no natural habitat exists there. Where natural habitat does exist at a facility, it was assumed that the absence of a habitat inventory or protection program represents a risk to that natural resource and the facility was given more points. The more acres of non-inventoried habitat present at the facility the higher the rating.

PERMIT COMPLIANCE

This category rates facilities according to their degree of noncompliance with environmental statutes and regulations. Facilities which received any notice of violation (NOV) issued over the last 5 years were assigned a score of 3 rating points. Facilities which received more than one NOV over the last 5 years were assigned a score of 4 rating points. Facilities which failed to comply with an Administrative Order received a score of 5 rating points. Facilities received rating points for each media in which they were in noncompliance [Table 1].

Information regarding permit compliance was obtained from Compliance Monitoring and Enforcement Log Data found in HWDMS database's Evaluation, Violation, and Enforcement Report, PCS database's Significant Noncompliance

Report, CDS database's Significant Violators Report, and the Region X Enforcement and Compliance Inventory.

SPILLS (CWA)

This category rates facilities according to how frequent spills of oil and hazardous materials have been, how the facility is prepared to respond to spills, and what best management practices (BMPs) are being implemented to prevent spills from occurring at the facility (including the use of an updated SPCC plan). Information for this category was obtained from federal and state personnel who are familiar with the spill prevention and response programs at each of the facilities. A rating of 0 was given where there were no reported spills, the facility has the demonstrated ability to respond to a spill, and good BMPs are in place. Because of the potentially serious environmental problems that can result from spills, rating points were doubled for this category. A rating of 6 was given if spills had been reported and the facility response and BMPs were judged to be fair. A rating of 10 was given if there had been several reported or suspected spills at the facility, there has been no response capability demonstrated, and the facility has no BMPs in place to deal with spills.

RESULTS

The selected federal facilities are listed in decreasing order of their overall potential for environmental problems, as identified by the Multi-Media Priority Ranking Model [Table 2]. The rankings are not only useful in identifying the facilities with the highest potential for environmental problems, but also show those activities which need to be emphasized during inspections, and for implementation of the Puget Sound Water Quality Management Plan.

As previously stated, the facility rating was not designed to be compared to a fixed number to indicate whether an installation is environmentally "good" or "bad." Rather, the rating indicates whether there is potential, when compared with other installations, for major environmental problems. A high total rating indicates that, based on the type and level of onsite activities, a facility has a high probability of having environmental problems. It also indicates a more detailed evaluation of the facility may be warranted.

This ranking only provides an initial evaluation of the selected facility, based on available information, and should be supplemented by a more detailed analysis of Region files which includes a review of compliance status prior to any onsite investigations.

Table 2
PUGET SOUND FEDERAL FACILITIES POLLUTION POTENTIAL RANKINGS

CRITERIA	WHIDBEY ISLAND NAVAL AIR STATION	PUGET SOUND NAVAL SHIPYARD	FORT LEWIS
TOTAL RATING	**88**	**84**	**81**
Hazardous Waste Management	**6**	**8**	10
Quantity Generated	2	2	2
Storage Capacity	2	2	2
Treatment Capacity	1	3	3
Disposal Capacity	0	0	2
Site Contamination	**17**	**16**	**15**
Seriousness	5	4	5
Soil/Water Contamination	5	5	5
Sediment Contamination	3	5	1
Drinking Water Supplies	2	0	2
Bulk Storage	2	2	2
Wastewater Discharges	**13**	**13**	**10**
Flow Rate	3	5	5
SIC Toxicity Group	3	3	3
Industrial Pretreatment	5	2	2
Suspected Toxic Discharge	2	3	0
Toxic Substances	**9**	**5**	**9**
PCB Use	4	4	4
Pesticide Use	5	1	5
Air Emissions	**4**	**6**	**4**
Pollutants Discharged	4	2	4
Nonattainment Discharge	0	0	0
Hazardous Discharge	0	4	0

Table 2 (cont.)

CRITERIA	WHIDBEY ISLAND NAVAL AIR STATION	PUGET SOUND NAVAL SHIPYARD	FORT LEWIS
On-base Water Supplies	0	0	2
Stormwater/Nonpoint Runoff	**14**	**13**	12
Impervious Surface Area	5	5	5
Potential Contamination	5	3	5
Collection/Treatment	4	5	2
Natural Resources/ Wetlands/Shellfish	**8**	**6**	7
Extent Inventoried	4	3	4
Protection Program	4	3	3
Spills	**8**	**6**	**4**
Environmental Statutes/ Regulations Compliance	**9**	**11**	**8**
RCRA/CERLA	3	4	3
CWA	3	3	5
TSCA	3	4	0
CAA	0	0	0
TOTAL RATING	**88**	**84**	**81**

Table 2 (cont.)

PUGET SOUND FEDERAL FACILITIES POLLUTION POTENTIAL RANKINGS

CRITERIA	MCCHORD AFB	BANGOR NAVAL SUBMARINE BASE	NUWES KEYPORT
TOTAL RATING	**77**	**75**	**73**
Hazardous Waste Management	**6**	**10**	**9**
Quantity Generated	3	4	4
Storage Capacity	2	3	2
Treatment Capacity	0	2	2
Disposal Capacity	0	0	0
Site Contamination	**14**	**18**	**19**
Seriousness	5	5	5
Soil/Water Contamination	5	5	5
Sediment Contamination	0	4	5
Drinking Water Supplies	2	2	2
Bulk Storage	2	2	2
Wastewater Discharges	**11**	**7**	**10**
Flow Rate	3	3	2
SIC Toxicity Group	3	3	3
Industrial Pretreatment	2	1	2
Suspected Toxic Discharge	3	0	3
Toxic Substances	**8**	**6**	**5**
PCB Use	4	4	4
Pesticide Use	4	2	1
Air Emissions	**8**	**4**	**4**
Pollutants Discharged	4	4	4
Nonattainment Discharge	4	0	0
Hazardous Discharge	0	0	0

Table 2 (cont.)

CRITERIA	MCCHORD AFB	BANGOR NAVAL SUBMARINE BASE	NUWES KEYPORT
On-base Water Supplies	**2**	**2**	**1**
Stormwater/Nonpoint Runoff	**13**	**13**	**11**
Impervious Surface Area	5	5	3
Potential Contamination	5	5	3
Collection/Treatment	3	3	5
Natural Resources/ Wetlands/Shellfish	**5**	**0**	**3**
Extent Inventoried	3	0	0
Protection Program	2	0	3
Spills	**4**	**6**	**7**
Environmental Statutes/ Regulations Compliance	**6**	**9**	**4**
RCRA/CERLA	3	3	4
CWA	3	0	0
TSCA	0	3	0
CAA	0	3	0
TOTAL RATING	**77**	**75**	**73**

Table 2 (cont.)

PUGET SOUND FEDERAL FACILITIES POLLUTION POTENTIAL RANKINGS

CRITERIA	MANCHESTER NAVAL SUPPLY CENTER	MUKILTEO DEFENSE FUEL SUPPLY POINT	NUWES INDIAN IS
TOTAL RATING	**52**	**51**	**50**
Hazardous Waste Management	**5**	**3**	**7**
Quantity Generated	3	2	2
Storage Capacity	1	0	2
Treatment Capacity	0	0	2
Disposal Capacity	0	0	0
Site Contamination	**16**	**14**	**15**
Seriousness	3	3	3
Soil/Water Contamination	5	5	5
Sediment Contamination	4	4	5
Drinking Water Supplies	2	0	0
Bulk Storage	2	2	2
Wastewater Discharges	**10**	**8**	**6**
Flow Rate	3	3	2
SIC Toxicity Group	3	3	3
Industrial Pretreatment	1	0	1
Suspected Toxic Discharge	3	2	0
Toxic Substances	**5**	**4**	**4**
PCB Use	4	4	4
Pesticide Use	1	0	0
Air Emissions	**0**	**2**	**1**
Pollutants Discharged	0	2	1
Nonattainment Discharge	0	0	0
Hazardous Discharge	0	0	0

Table 2 (cont.)

CRITERIA	MANCHESTER NAVAL SUPPLY CENTER	MUKILTEO DEFENSE FUEL SUPPLY POINT	NUWES INDIAN IS
On-base Water Supplies	**1**	**0**	**0**
Stormwater/Nonpoint Runoff	**3**	**4**	**5**
Impervious Surface Area	1	0	1
Potential Contamination	2	1	3
Collection/Treatment	0	3	1
Natural Resources/ Wetlands/Shellfish	**4**	**7**	**2**
Extent Inventoried	2	2	0
Protection Program	2	5	2
Spills	**1**	**5**	**3**
Environmental Statutes/ Regulations Compliance	**7**	**4**	**7**
RCRA/CERLA	4	1	4
CWA	3	3	3
TSCA	0	0	0
CAA	0	0	0
TOTAL RATING	**52**	**51**	**50**