



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

AUG 28 1992

Ms. Linda Dietz
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Mail Stop, #82
Lester, PA 19113-2090

Dear Ms. Dietz:

In July of 1990, the National RCRA Implementation Study recommended that national guidance be developed to ensure consistency among regional offices in setting priorities. To deal with our RCRA corrective action responsibilities, the Environmental Protection Agency developed the National Corrective Action Prioritization System (NCAPS).

Since August 1991 Region I of the Environmental Protection Agency has been working on evaluating the potential risk posed by all RCRA Treatment, Storage and Disposal facilities in the Region using NCAPS. (The attached fact sheet provides a brief overview of this system). The final outcome of this evaluation is a ranking for each facility as a high, medium, or low significance facility.

These rankings will be used as a tool in prioritizing the order in which facilities are considered for corrective action, with high significance facilities generally being addressed first. However, after considering other relevant factors such as facility compliance history or the requirements of existing permits, EPA may elect to work on high, medium and low facilities in any order. Factors which will lead EPA to consider a medium or low significance facilities ahead of high significance facilities include such considerations as the requirements of existing permits and facility compliance history. The decision to require corrective action at a given facility will be based on the site specific information underlying the ranking and site specific circumstances.

As of April 18, 1991 the USN Portsmouth Naval Shipyard facility (RCRA ID# NH7170022019) located in Portsmouth, NH was ranked as a high significance facility.



If you have any questions on the ranking process, how the ranking will be used, or the ranking of your facility please contact Ernest Waterman at (617) 223-5511.

Sincerely,



Matthew Hoagland, Chief
ME, NH, & VT Waste Regulation Section

cc: Stacey Ladner ME DEP
James Tayon

SUMMARY SHEET

The National Corrective Action Prioritization System

Introduction

In 1984, Congress amended the Resource Conservation and Recovery Act (RCRA), and provided EPA with broad new authorities to require cleanup, or "corrective action", at hazardous waste management facilities. Corrective action can involve a wide variety of activities, including cleanup of contaminated environmental media such as soils and ground water, treatment of the sources of contamination, and actions to control or prevent exposure to contamination. Corrective actions can be required at facilities that have RCRA permits as well as at facilities that are operating under "interim status."

Currently, there are approximately 4,300 facilities that treat, store or dispose of hazardous wastes, which can be compelled to take corrective action when necessary. Some facilities are very large and have extensive contamination problems which rival the largest Superfund sites. Other facilities have relatively minor environmental problems. Still others will not need remedial action at all. Given this diversity, the large number of RCRA facilities, and the technical complexities of remediation, EPA and the States must set priorities in deciding which facilities should receive attention, and when.

It is EPA's policy to compel corrective action at the "worst sites first". As a result, the Agency has developed a system for assessing the relative environmental cleanup priority of RCRA facilities, called the National Corrective Action Prioritization System (NCAPS). This system is intended to provide a nationally consistent approach to assessing site factors that drive cleanup priority decisions.

About NCAPS

NCAPS is a computer-based system that considers a variety of environmental factors in assessing the priority of sites, such as the types and volumes of wastes present, contaminant release pathways, and the potential for exposure to contaminants by humans and ecosystems. In this sense, the system is similar to the Hazard Ranking System (HRS) used by the Superfund program. However, NCAPS is designed to be a less resource intensive system to use, and provides priority rankings with less site data than is normally required for HRS scoring.

NCAPS generates a High, Medium or Low ranking for each facility. The ranking is based on an evaluation of four pathways of actual or potential contamination (ground water, surface water, air and soils) and nationally-established criteria for determining

High/Medium/Low. The information needed for running the system is usually obtained from initial assessments of facilities conducted by EPA or authorized States. EPA expects that such assessments (commonly called RCRA Facility Assessments, or RFAs) will have been completed, and NCAPS rankings determined, for nearly all RCRA facilities by the end of 1993.

A facility's ranking may change based on new or additional information or as a result of a remedial action at the site. Consequently, the rankings generated by the NCAPS system may also change. In addition, the Agency expects some refinements to NCAPS will be made based on the operating experience of EPA and the authorized States. Such changes could also affect the scores of some sites.

How NCAPS Rankings Will be Used

EPA and the authorized States use the High/Medium/Low rankings to identify the general priority for initiating cleanup of facilities through either permits or enforcement orders. However, a facility's NCAPS ranking is not the only factor in determining when corrective action will be initiated. Other factors, such as the enforcement history of the facility, the need to address the facility in the context of a regional environmental initiative (e.g., EPA's Great Lakes Initiative), or other special conditions at the site, can also play a role in determining which facilities are a High priority for corrective action.

In addition to corrective action, the RCRA program is responsible for ensuring that hazardous waste management facilities comply with a wide range of "prevention" requirements, which are designed to minimize the risk of future contamination problems. To this end, issuing operating permits and enforcing RCRA regulatory requirements are also important program priorities. Balancing and integrating the cleanup and prevention goals of the RCRA program is a continuing challenge for EPA and the States. Further information on EPA's overall strategy for implementing the RCRA program is provided in the EPA RCRA Implementation Plan, which is updated annually and is available from EPA Regional Offices or the RCRA Hotline (see below).

For Further Information

Further information on the NCAPS system may be obtained by contacting RCRA program staff in EPA's Regional Offices. Inquiries may be directed to:

Region I	(617) 573-5700
Region II	(212) 264-2301
Region III	(215) 597-8131
Region IV	(404) 347-3454
Region V	(312) 886-7579
Region VI	(214) 655-6700
Region VII	(913) 551-7050

Region VIII (303) 293-1720
Region IX (415) 744-1730
Region X (206) 553-1261

RCRA Hotline 1-800-424-9346
(703) 920-7672 (Virginia)