Name and Location of Site

Environmental Record Review

Prepared for (Name of Entity)

Technical Assistance for Brownfields Program - EPA Region 1

Date, 2023

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# EXECUTIVE SUMMARY

*Provide a concise and clear summary of the findings, opinions, and conclusions of the report. Provide key evidence used to justify the identification of areas of concern (AOCs) and recommendations for further investigation (if any). The Executive Summary should not present any information that is not presented in the body of the report. Write the Executive Summary after the main report is completed.*

# SECTION 1 INTRODUCTION & OBJECTIVES

*1. Identify the municipal entity that requested this Record Review*

*2. Identify the subject property/properties*

*3. Identify the Objectives of the Record Review: this should have been provided by the municipality. Such purposes may include establishing the scope of subsequent investigations, preparing to apply for a brownfield assessment or cleanup grant, collecting information to be used to help the municipality decide whether to acquire the property, preparing to solicit proposals from prospective buyers/developers, etc.*

*4. Describe the procedures and limitations of the Record Review: This should clearly state what information sources were used. It should also include a disclaimer:*

***This report was prepared as a tool to help [name the municipal entity] to review and organize existing environmental information regarding the site and to help plan the next steps in the assessment of site environmental conditions. This report does not fulfill any state or federal rules or regulations. Should any party undertake investigations suggested herein, a qualified environmental professional should be retained to plan and execute such investigations.***

# SECTION 2 SITE INFORMATION

*If there are previous environmental assessment reports, most will contain a good description of the site that you can adapt for your purposes. Note that a report more than a few months old may contain outdated information. Businesses on the site may have changed, buildings may have been demolished or built, cleanup may have occurred, etc. Cite references for all information.*

## 2.1. Property Description & Existing Conditions

* *Identify the Site by address(es) and municipal tax identifications (tax assessor’s parcel I.D. or Map/Block/Lot number(s), and latitude and longitude. Include a property boundary map, ideally from a GIS system, showing parcel boundaries, parcel identifications, and background layers that help to show the site’s physical layout. Aerial/satellite images are often useful backgrounds.*
* *Describe the development on the property – the number, types, sizes, ages of all buildings and structures, site utilties, access to roads/railroads/navigable waters*
* *List ownership, past and present, with dates of occupancy*
* *Describe the site’s applicable zoning*
* *Provide a brief summary of the operational history of the property. (Details regarding operational history should be presented in the Section on Historical Records Review – Section 3.1 in this suggested format)*

## 2.2. Environmental Setting

* *Describe the site’s physical setting – topography, geology, hydrology, wetlands, floodplains. Also describe the surrounding area – is it rural, suburban, or urban; residential, commercial, industrial, mixed.*

## 2.3. Materials Handling and Permitting History

* *List known or likely materials managed currently and in the past, and describe the use, storage, handling and disposal of hazardous substances, hazardous and non-hazardous wastes, petroleum, etc.*
* *Describe any environmental permit history, and the history of any violations of environmental rules, regulations, or permit conditions*
* *Other pertinent information*

Insert a site location map, preferably based on USGS topographic mapping or orthographic images. If the site is large enough, show and label its boundaries. Be sure to include enough of the surrounding area to allow the reader to know the precise location

*Figure 1: Site location map*

Insert a site plan (or more than one site plan). This can be adapted from existing site plans available from previous reports, if such plans are of good quality, or drawn using a base map or aerial/satellite imagery. Label property boundaries and major features such as buildings and other features that are referenced in your report.

*Figure 2: Site location map*

# SECTION 3 RECORDS REVIEW

## 3.1 Historical Records Review

*Summarize the history of the site using available sources of information. The objective of compiling and analyzing historical property information and developing a history of the*

*previous uses of the subject property, adjoining properties, and surrounding area is to help identify the likelihood of past uses having led to environmental areas of concern in connection with the subject property. You should thoroughly summarize the historical development, ownership, and uses of the property, including the activities that were conducted there. For example, if a historic use of a property included metals fabricating, did activities include metal plating, cutting, and grinding, or degreasing, etc. After reviewing available sources of information, identify significant gaps that remain in your understanding of the site’s history.*

*You may find useful information about the general site history in previous environmental reports that will help you to complete Section 3.1.1. However, this Section* ***is not*** *for summarizing specific environmental history, such as the results of queries of environmental databases or the findings of site-specific environmental reports; such environmental site history should be summarized in Section 3.2.*

*As for the format, we have suggested subsection titles, but you should feel free to summarize this information in whatever format best suits your project. One option may be a large table, with column headings such as “date”, “data source”, “summary of historical information.” It is fine to have tables like this spill onto multiple pages. If you use a format like this, it is better to present all information chronologically in a single table, than to make multiple tables – one for each source of information (Sanborn Maps, Aerial Photos, Topographic Maps, etc.).*

### **3.1.1. Summary of Historical Information from Previous Site Investigations (if applicable)**

*If reports of previous site investigations are available, you may be able to obtain important historical information from these documents. However, be aware that some reports do a poor job of reviewing site history, leaving many gaps or making errors. If you find conflicting information, you should reference the sources of the information and describe the discrepancies. It is better to indicate that information is uncertain, than to repeat mistakes others have made. Again, this section* ***is not*** *for details regarding previous investigations or remediation, which you will summarize in Section 3.2.*

### **3.1.2. Summary of findings from Sanborn Maps**

### **3.1.3. Summary of findings from Aerials**

### **3.1.4. Summary of findings from Topographic Maps**

*In addition to the reports of previous site studies, helpful historical resources include Sanborn Maps or other historic fire insurance mapping, historical aerial photography (often available digitally from state and university libraries and private vendors), published local street directories, local or county clerks and tax assessors, historic topographic maps available from USGS, local government agencies, including building departments, land use departments (e.g., planning & zoning, inland wetlands, conservation commissions); and other historical resources (e.g., books; magazines; theses; dissertations; archives of local, state and university libraries; museums; and community organizations. Occasionally, you will find a rare book, written by a local author, and providing detailed information about historic businesses and industries).*

*Sanborn fire insurance maps are often highly detailed and are valuable sources of information about historical facilities. Sanborn maps published before 1928 is available from digital collections of the Library of Congress; however, Sanborn Maps published or copyrighted after 1928 are available only from the holder of the copyright, Environmental Data Resources, Inc.*

*Note that other companies also produced detailed fire insurance mapping. If your area of interest is a historically urban or industrial area, and is not covered by Sanborn mapping, there is a chance it was mapped by a different company, such as the Associated Factory Mutual Insurance Company, Associated Mutual Insurance Company or other regional insurance company. Such maps may be available from various library collections, the Library of Congress or through various libraries that can be accessed via jstor.org. Although there is no single repository of these various maps, you may get lucky with a quick internet search for such mapping, or even by searching local libraries or the collections of a local historical society.*

## 3.2 Regulatory Records Review

*The purpose of the records review is to obtain and review records that will help identify areas of concern in connection with the subject property. Spend some time reviewing examples of the reports of Phase I Environmental Site Assessment Reports to see how consultants summarize the results of their regulatory reviews.*

### **3.2.1 Summary of EDR findings**

*For most brownfield sites, a key component of the Regulatory Records Review will involve a search of available state and federal environmental databases. Private database search companies, such as Lightbox Environmental Data Research, Inc., (EDR) offer this service for a fee, providing rapid access to dozens of databases that are maintained by USEPA and other federal agencies, as well as state and county environmental agencies. However, you can access many federal databases, and some state databases via the internet.*

*If you were provided with a current EDR report, you should include it as an appendix to your report. There is no reason to re-create all of this information, but you do need to know what is in the EDR report, and summarize the main findings in your report. Be aware that the EDR reports frequently contain a great deal of information that will not pertain directly to your site, but is generated as a result of searches of databases within a specified radius of your site. Focus primarily on the information directly related to your site. Occasionally, you will find EDR information that suggests other properties have the potential to affect your site – such as nearby or adjacent properties that are at higher elevations than your site, which may suggest that groundwater contaminants may flow toward your site from these other properties. A plume of contaminants migrating in groundwater toward your site from another property is definitely an important fact.*

### **3.2.2 Summary of Previous Environmental Records**

A second key component of the records review is the review of available environmental reports. These may be provided by your municipal client, obtained in digital format via online document portals of state environmental agencies or USEPA, or discovered as part of a search of hard copy files made available by state or federal agencies. Your task will be to summarize each document. This information is easily organized and most useful in a table format - see suggested format below. List documents in chronological order. Each row should be for one document. If your project involves more than one property, keep the information separate and use more than one table to present this information.

### **3.2.3 Summary of Other Environmental Records (local files)**

*A third component of the records review include documents made available from local governmental agencies. Depending on the state, county, or municipality, such agencies may include the local planning and zoning commission, conservation commission, inland wetlands commission, fire department/fire marshal’s office, local health department or regional health district, water pollution control commission, etc. Some local agencies will give you important environmental information over the phone, but for most, you will need to visit their offices to review relevant files.*

| ***Document Title/Description and Date*** | ***Summary of Procedures and Main Findings, Conclusions and Recommendations*** |
| --- | --- |
| *Include Complete Title and Date, Identify “Prepared For…” and “Prepared By”*  *Note the purpose of the document. For example, was it prepared as part of a regulatory submittal or approval? Note the specific agency(ies) involved and any regulatory outcome, such as approvals issued.*  *Also identify how this report was obtained (i.e., was it provided to TAB by the municipality, or , and whether it was a complete document, or if it was missing any sections/appendices* | *If the document is from a regulatory agency (such as EPA or Dept of Environmental Protection, be sure to note whether the agency has ordered additional work. If a document is available from an online repository, include a web link.*  *Prepare a brief “executive summary.” If the Report already has an Executive Summary section, then this section should be easy to prepare. If not, then write short descriptions and use bulleted or numbered lists as much as possible.*  *Your executive summary of the previous report should describe “areas of concern” (AOCs) or “recognized environmental conditions” (RECs) or release areas that the authors identified, and should describe the procedures, findings, and conclusions of investigations of the AOCs/RECs/release areas. Don’t be redundant: if any such AOC/REC/release area is addressed more fully in later reports, you do not need extensive detail; instead, just briefly mention the work that was done under this particular report and refer the reader to your summary of the later report(s).Pay particular attention to the conclusions and recommendations of previous reports, as these will be useful in determining data gaps.* |

# SECTION 4. SITE RECONNAISSANCE

Summarize information obtained during your site reconnaissance. Start by describing how the reconnaissance was performed (i.e., walking tour, windshield survey, etc. – and be sure to list the areas and building interiors you did NOT examine. Provide a general overview of the site based on your reconnaissance and add photos with captions if they help to illustrate site features or environmental conditions.

Your scope was not to conduct a comprehensive reconnaissance; so be careful not to make too many conclusions or inferences. However, you may have observed conditions that have never before been documented. Your observations may also provide an update to previous investigations. For example, if an earlier environmental report indicated the presence of drums of waste in a particular location of the site, and your reconnaissance reveals that drums appear to still be present in the same location, you should include this information here..

# SECTION 5 FINDINGS AND CONCLUSIONS

Your conclusions should describe each AOC/REC you have identified through your record reviews and provide the justification for its inclusion as an AOC/REC. Describe the contaminant source(s) and the media affected (soil, groundwater, sediment, building materials). If available, include information regarding the extent of contamination (how large and deep is the release area, the groundwater plume, etc.?); the degree of contamination (concentrations of contaminants relative to applicable cleanup standards); the migration pathways (known or inferred); and other information that will help the reader understand the nature of the AOC. Each AOC should be evaluated as to its current status, i.e., has it been investigated fully, partly, or not at all? Is active cleanup in progress? Is the AOC subject to an environmental agency’s enforcement action or other regulatory cleanup requirement, and if so, has the AOC been addressed to the satisfaction of the applicable regulatory authorities?

Your conclusions should list any significant data gaps. Data gaps should have been identified in the reports of previous investigations or other documents, but some data gaps may be evident to you as you assemble and review available information.