



DEPARTMENT OF
ECOLOGY
State of Washington

Toxics Cleanup Program Policy

Policy 310A

Resource Contact: Policy and Technical Support Staff

Effective: January 5, 1993

References: RCW 70.105D.030(2)(d)
WAC 173-340-310

Revised: December 17, 2009

Policy 310A Initial Investigations

The Model Toxics Control Act (MTCA), chapter 70.105D RCW, requires the Department of Ecology (Ecology) to initiate the investigation of a hazardous waste site after Ecology receives information that the site may pose a threat to human health or the environment. The purpose of the initial investigation is to determine whether a release or threatened release of a hazardous substance may have occurred that warrants further action under MTCA. The initial investigation also provides the initial investigator with an opportunity to encourage cleanup of easily remediated releases.

This policy provides guidance regarding the initial investigation process set forth in WAC 173-340-310, including guidance regarding the following:

- Whether an initial investigation is required;
- Whether another agency or a consultant may conduct the initial investigation;
- What tasks must be completed as part of the initial investigation;
- What decision must be made based on the initial investigation;
- Who must make that decision;
- Who must be notified of the decision; and
- How the site will be tracked.

As part of the initial investigation, the investigator must also begin the process of identifying potentially liable persons (PLPs). For guidance regarding the identification of PLPs, see POL 500B, Identification of Potentially Liable Persons.

1. Ecology must determine whether an Initial Investigation is required

Pursuant to WAC 173-340-310(2), whenever Ecology receives a release report or combined release and action report, Ecology must evaluate the report to determine whether an initial investigation is required. An initial investigation is required whenever Ecology believes that all of the following apply to the situation:

- a. There may be a release or threatened release to the environment;
- b. The release or threatened release is of a hazardous substance; and
- c. The release or threatened release may pose a threat to human health or the environment.

When determining whether an initial investigation is required, Ecology must consider each site on its own merits. In other words, Ecology must not lump the site together with adjacent sites and consider the cumulative threat posed by the sites.

If Ecology determines that an initial investigation is required, Ecology must complete the investigation within ninety (90) calendar days of receiving the release report.

Typically, release reports and combined release and action reports are processed by the Regional Environmental Response Tracking System (ERTS) coordinator and referred to the Toxics Cleanup Program (TCP) for evaluation.

2. Certain Releases do not require an Initial Investigation

Pursuant to WAC 173-340-310(3), even if Ecology determines that an initial investigation is warranted because it believes there may be a release or threatened release of hazardous substances that may pose a threat to human health or the environment, Ecology does not need to conduct an initial investigation if:

- a. The circumstances associated with the release or threatened release are known to Ecology and have previously been or are currently being evaluated by Ecology or another appropriate government agency. Examples include, but are not limited to, the following:
 - Home heating oil tank releases addressed by the Pollution Liability Insurance Agency (PLIA). Ecology expects that PLIA will address all home heating oil tank releases unless ground water or surface water is impacted from the release, adjacent properties are impacted from the release, contamination is pooling on the ground surface, or heating oil is causing fume problems in buildings.
 - Drug labs addressed by the Spill Response Program and/or local health districts/enforcement agencies.
 - Sites where a cleanup has been conducted and a report has been submitted to Ecology for review under the Voluntary Cleanup Program. In these cases the elements of an initial investigation described in **Section 5**, below, should be incorporated into the review.
- b. The release is governed by a permit and meets the conditions of the permit; or
- c. The release is exempt from reporting under WAC 173-340-300(3) (see POL 300, Site Discovery – Reporting Releases).

In these instances, Ecology may, but is not obliged to, conduct an initial investigation in response to the release report.

3. Ecology may rely on Others to conduct an Initial Investigation

Pursuant to WAC 173-340-310(4), Ecology may rely on another government agency or a consultant under contract with Ecology to conduct an initial investigation on its behalf, provided:

- a. The agency or consultant is not suspected of having contributed to the release or threatened release;
- b. The agency or consultant has no other conflict of interest; and

- c. The agency or consultant provides Ecology with all information required to evaluate the release.

Although Ecology may rely on another government agency or a consultant under contact with Ecology to conduct an initial investigation, Ecology is responsible for making the decision regarding further action based on that investigation. See **Section 7** of this policy.

4. Investigator must complete Training prior to conducting Initial Investigation

TCP staff who conduct initial investigations must complete all required training specified in the TCP Safety Plan prior to conducting an initial investigation. Completion of a risk assessment course is recommended prior to conducting unsupervised initial investigations.

5. Investigator must complete Specified Tasks during Initial Investigation

As part of the initial investigation, the investigator must:

- a. **Complete an Initial Investigation Site Visit Health and Safety Checklist (Attachment A);**

The investigator must complete the checklist prior to any on-site inspection activity or entry into contaminated or potentially contaminated areas.

- b. **Conduct a site visit;**

A site visit may or may not include site entry. The site investigator must not enter the site or work in the vicinity of a hazard if the investigator is not adequately protected and trained (see also Section 4 of this policy). The investigator must notify the owner or operator prior to entering property if the owner or operator is known, or can readily be identified by the investigator (see also POL 800, Property Access).

- c. **Complete an Initial Investigation Field Report (Attachment B); and**

The investigator must complete the report form after conducting the investigation, including the site visit. As part of the report, the investigator must make a recommendation regarding what, if any, further action is required at the site.

- d. **Identify owners and operators and, as appropriate, potentially liable persons (PLPs).**

The investigator must identify the current or most recent owner or operator of the site during the investigation. The investigator should also identify any other easily identifiable PLPs. For guidance regarding the identification of PLPs, see POL 500B, Identification of Potentially Liable Persons.

6. Investigator may conduct Limited Sampling during Initial Investigation

The investigator may conduct limited sampling during the initial investigation for one or more of the following reasons:

- a. To determine whether there has been a release or threatened release of hazardous substances that poses a threat to human health or the environment;

- b. To determine whether action under MTCA is required or whether action under another authority is appropriate;
- c. To determine whether an interim or emergency action is required under MTCA;
- d. To identify the source of the hazardous substance; or
- e. To avoid a lost opportunity if sampling is delayed.

If sampling is conducted, the sampling results should be entered into Ecology's Environmental Information Management (EIM) database.

7. Investigators should encourage Quick and Permanent Cleanups of Soil-only Sites during the Initial Investigation.

If investigators make the following determinations about the site during an initial investigation, then they should encourage willing owners and operators to quickly clean up the site:

- The releases at the site impact or threaten only the soil, and an evaluation of the soil to vapor pathway is not required under WAC 173-340-740 or 173-340-745.
- The soil at the site can be cleaned up permanently (i.e., without the need for institutional or engineered controls).

To facilitate and encourage the cleanup of such sites, Ecology may also do the following:

- Extend the initial investigation for up to an additional ninety (90) calendar days (i.e., six months after receiving the release report). Ecology may extend the initial investigation for more than ninety (90) calendar days, but only if the owner or operator demonstrates that more time is necessary to complete the cleanup and provides a plan and schedule for completing the cleanup within that time.
- Provide limited technical assistance to the owner or operator without charge.

If such sites are cleaned up before Ecology makes a decision regarding further action, then Ecology should review the cleanup without charge before making a decision regarding further action.

8. Ecology must make a Decision regarding Further Action within Thirty Days of completing the Initial Investigation

Pursuant to WAC 173-340-310(5), Ecology must make a decision regarding further action within thirty (30) calendar days of completing the initial investigation. Although Ecology may rely on another government agency or a consultant under contract with Ecology to conduct an initial investigation and make a recommendation regarding further action (see **Section 3** of this policy), Ecology is still responsible for making the decision regarding what, if any, further action is required at the site. The final decision will be made by the TCP Regional Section Manager or designee.

Ecology's decision must be based on the information contained in Ecology's site file, which must include the required initial investigation forms (**Attachments A and B**) and any other information known to Ecology regarding the site.

Based on that information, Ecology must make one of the following determinations:

a. There is no site that ever required action under MTCA.

Ecology may determine there is no site that ever required action under MTCA. Ecology may make this determination if:

- There was no release or threatened release of hazardous substances; or
- There was a release or threatened release of hazardous substances, but it never posed a threat to human health or the environment.

The determination that a release or threatened release did not pose a threat to human health or the environment must be based on factors other than the implementation of any remedial action to clean up the release.

Ecology may also determine, though, that action under another authority is still appropriate and refer the complaint to that authority.

If you make this determination, then go to **Section 9** of this Policy.

b. There is a site, but action under another authority is appropriate.

Ecology may determine there is a site, but that action under an authority other than MTCA is appropriate to clean up that site. Such authorities include, but are not limited to, the following:

- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. 9601 et seq.
- Solid Waste Disposal Act (SWDA), 42 U.S.C. 6901 et seq.

If you make this determination, then go to **Section 10** of this Policy.

c. There is a site, but no further action is required under MTCA.

The owner or operator may attempt to clean up the site before Ecology conducts or completes an initial investigation. In such cases, Ecology may review the cleanup during the investigation to determine whether further action is necessary under MTCA to clean up the site.

However, Ecology should only make a no further action (NFA) determination based on an initial investigation if:

- The release impacted or threatened only the soil, and an evaluation of the soil to vapor pathway is not required under WAC 173-340-740 or 173-340-745; and
- The cleanup of the soil is permanent (that is, no institutional or engineered controls are necessary as part of the cleanup).

If you make a NFA determination, then go to **Section 11** of this Policy.

d. There is a site and further action is required under MTCA.

Ecology may determine further action is required under MTCA to clean up the site. If so, then Ecology must also determine whether one or more of the following actions are necessary:

- Site hazard assessment.
- Emergency action.
- Interim action.

If you make this determination, then go to **Section 12** of this Policy.

Ecology's decision regarding the need for and type of action based on the initial investigation does not preclude it from requiring some other action in the future based on a reevaluation of the site or additional information.

9. Next Steps if there is No Site that ever required Action.

a. Tracking

Ecology will do the following to track its determination and the site:

- i. Submit its determination to the Regional Coordinator of the agency's Environmental Response Tracking System (ERTS) for entry on that System.
- ii. If action under another authority is appropriate, refer the complaint to the government agency or program responsible for exercising that authority.

However, Ecology will not enter or track the cleanup of the suspected release on the Program's Integrated Site Information System (ISIS) database.

b. Notification

If requested by an owner or operator, then Ecology will provide written notification of its determination to that owner or operator. The notification may be a copy of the ERTS sheet showing Ecology's determination.

Staff should also consider whether it is necessary to send the owner or operator an educational mailing discussing ways to prevent releases.

10. Next Steps if Further Action is appropriate under Another Authority.

a. Tracking

Ecology will do the following to track its determination and the site:

- i. Submit its determination to the Regional Coordinator of the agency's Environmental Response Tracking System (ERTS) for entry on that System.

- ii. Refer the site to the government agency or program responsible for exercising the other authority.
- iii. Enter and track the cleanup of the site on the Program's Integrated Site Information System (ISIS) database if the other authority used is one of the following:
 - Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. 9601 et seq.
 - Solid Waste Disposal Act (SWDA), 42 U.S.C 6901 et seq.
 - Hazardous Waste Management Act (HWMA), Chapter 70.105 RCW.
 - Water Pollution Control Act, Chapter 90.48 RCW, but only if such authority is used by the Toxics Cleanup Program to supplement its MTCA authority. Do not enter or track cleanups of spills conducted or required by the Spills Program under this authority.

Ecology should not enter or track cleanups conducted under other authorities.

The Ecology program that will manage the cleanup will be responsible for entering data into the ISIS database.

b. Notification

If requested by an owner or operator, Ecology will provide written notification of its determination to that owner or operator. The notification may be a copy of the ERTS sheet showing Ecology's determination.

11. Next Steps if No Further Action is required under MTCA.

a. Tracking

Ecology will do the following to track its determination and the site:

- i. Submit its determination to the Regional Coordinator of the agency's Environmental Response Tracking System (ERTS) for entry on that System.
- ii. Enter the site on the Program's Integrated Site Information System (ISIS) database, with a status of No Further Action (NFA). The site will be reported on the NFA list.

b. Documentation

Ecology will document its No Further Action (NFA) determination and place that document in the site file. At a minimum, the document must identify and describe the following:

- i. The site.
- ii. The uses of the property where the releases at the site occurred.

- iii. The sources and causes of the releases at the site.
- iv. The hazardous substances released at the site.
- v. The horizontal and vertical extent of soil contamination located at the Site.
- vi. The soil cleanup standards established at the Site.
- vii. The cleanup performed at the Site.

c. Notification

If requested by an owner or operator, Ecology will provide written notification of its No Further Action determination to the owner or operator. Staff should provide such notification before the site is entered on the ISIS database.

12. Next Steps if Further Action is required under MTCA.

a. Tracking

Ecology will do the following to track its determination and the site:

- i. Submit its determination to the Regional Coordinator of the agency's Environmental Response Tracking System (ERTS) for entry on that System.
- ii. Enter and track the cleanup of the site on the Program's Integrated Site Information System (ISIS) database. The site will be reported on the Confirmed and Suspected Contaminated Sites (CSCS) list.

The Ecology program that will manage the cleanup will be responsible for entering data into the ISIS database.

b. Notification

Ecology will provide written notification of its Further Action determination to the owner, operator, and any potentially liable persons known to Ecology. Staff should provide such notification before the site is entered on the ISIS database. The written notification must include the following:

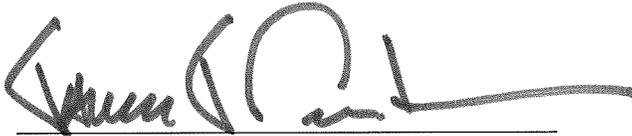
- i. The basis for Ecology's determination.
- ii. Information regarding the cleanup process provided for in chapter 173-340 WAC.
- iii. A statement that it is Ecology's policy to work cooperatively with persons to accomplish prompt and effective cleanups.
- iv. A person or office of Ecology to contact regarding the contents of the letter.

- v. A statement that the letter is not a determination of liability and that cooperating with Ecology in planning or conducting a remedial action is not an admission of guilt or liability.

To provide such notification, staff should use the boilerplate letter available on the Program's intranet web site. This letter is commonly referred to as the "early notice letter."

If Ecology also determined that an emergency or interim remedial action was required to address the threat to human health or the environment posed by the release or threatened release of hazardous substances, then Ecology may require that those persons located within the potentially affected vicinity be notified of that threat. The method and nature of the notification must be determined on a case-specific basis using the methods specified in WAC 173-340-600. Ecology may require the owner or operator of the facility to provide such notification, provided the request is made in writing.

Approved:



James J. Pendowski, Program Manager
Toxics Cleanup Program

Policy Disclaimer: This policy is solely to guide Ecology staff, and is not intended to impose any mandatory duties or obligations on Ecology. It does not create rights, substantive, or procedural, enforceable by any party in litigation. Ecology may act at variance with this policy or change or withdraw this policy at any time.

Attachments:

- Attachment A – Initial Investigation Site Visit Safety and Health Checklist
- Attachment B – Initial Investigation Field Report



INITIAL INVESTIGATION SITE VISIT SAFETY AND HEALTH CHECKLIST

I. SITE LOCATION INFORMATION

	ERTS Number	Date of Investigation
	Arrival Time	First Visit Yes <input type="checkbox"/> No <input type="checkbox"/>
Site Name		
Site Location		
Closest City	County	

II. PURPOSE OF SITE VISIT/ACTIVITY

Site Inspection	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Site Evaluation	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Well Drilling	Yes <input type="checkbox"/>	No <input type="checkbox"/>

III. SAMPLING

Ground Water	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Air	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Surface Water	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Drums	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Soil	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other	Yes <input type="checkbox"/>	No <input type="checkbox"/>

IV. EMERGENCY CONTACTS

Police	Nearest Hospital/Emergency Facility Name
Fire Department	Address _____
Ecology	Phone _____

V. PHYSICAL HAZARDS

Unstable stacks/piles <input type="checkbox"/>	Noise/source <input type="checkbox"/>	Temperature <input type="checkbox"/>
Confined spaces <input type="checkbox"/>	Electrical <input type="checkbox"/>	Slippery/tripping <input type="checkbox"/>
Construction/machinery <input type="checkbox"/>	Pits/trenches <input type="checkbox"/>	Radioactive materials <input type="checkbox"/>
Weather <input type="checkbox"/>	Steep slopes <input type="checkbox"/>	
Overhead <input type="checkbox"/>	Traffic <input type="checkbox"/>	
Other (explain) _____		

VI. CHEMICAL HAZARDS

Solvents (volatile) <input type="checkbox"/>	Explosives <input type="checkbox"/>	Flammable <input type="checkbox"/>
Oxidizers <input type="checkbox"/>	Corrosives <input type="checkbox"/>	Carcinogens <input type="checkbox"/>
Dusts <input type="checkbox"/>	Pesticides <input type="checkbox"/>	
Gases, vapors <input type="checkbox"/>	Metals <input type="checkbox"/>	
Other (explain) _____		
Infectious agents _____		

VII. INSTRUMENTATION

Survey Equipment:	
A. CGI – Multimeter (O2, LEL, H2S, CO): #	Calibration date
B. TIP (PID): #	Calibration date
C. OVA (FID): #	Calibration date
D. RAM 1 (particulate): #	Calibration date
E. Sensidyne tubes (specify type):	F. Radiation Meter: #
G. Other (explain):	

Action Levels:				
	Suspected Contaminant	Instrument Type	Action Level	Sample Numbers
1.				
2.				
3.				
4.				
5.				
6.				
Note: Survey results may be included on the site map.				

VIII. REQUIRED PERSONAL PROTECTIVE EQUIPMENT

Level of Protection	Level B <input type="checkbox"/>	Level C <input type="checkbox"/>	Level D <input type="checkbox"/>
Comments _____			
Body	Head	Hands	Footwear
Tyvec <input type="checkbox"/>	Hardhat <input type="checkbox"/>	Gloves <input type="checkbox"/>	Workshoes <input type="checkbox"/>
Keppler <input type="checkbox"/>	Goggles <input type="checkbox"/>	Outer <input type="checkbox"/>	CPC Boots <input type="checkbox"/>
Saranex <input type="checkbox"/>	Earplugs <input type="checkbox"/>	Inner <input type="checkbox"/>	Booties <input type="checkbox"/>
Raingear <input type="checkbox"/>	Faceshield <input type="checkbox"/>	Specify Type _____	Steel-toes shoes <input type="checkbox"/>
Overalls <input type="checkbox"/>	Safety glasses <input type="checkbox"/>	_____	Waders <input type="checkbox"/>
Other _____	Ear muffs <input type="checkbox"/>	-	Insulated liners <input type="checkbox"/>
_____	Hood <input type="checkbox"/>	_____	
_____	Respirator <input type="checkbox"/>	-	
Respiratory Protection	Level 8* <input type="checkbox"/>	Level C* <input type="checkbox"/>	Level D <input type="checkbox"/>
Comments _____			
* Level B use shall require TCP staff to obtain the services of Level B trained personnel.			
** ELSA - Supplied air to be used as backup for escape only.			
Full face w/new cartridge <input type="checkbox"/>		Half face w/new cartridge <input type="checkbox"/>	

VIII. REQUIRED PERSONAL PROTECTIVE EQUIPMENT (continued)

Miscellaneous Equipment:

Drinking Water	<input type="checkbox"/>	Radio	<input type="checkbox"/>	Binoculars	<input type="checkbox"/>
Eye wash	<input type="checkbox"/>	Electrolyte drink	<input type="checkbox"/>	Flashlight	<input type="checkbox"/>
Camera	<input type="checkbox"/>	Fire extinguisher	<input type="checkbox"/>		
Other (explain) _____					

IX. POTENTIAL EXPOSURE

Total time on site: _____ hours and _____ minutes

Known chemical exposure: _____

Protected? Unprotected?

X. SAFETY RECOMMENDATIONS/CAUTIONS FOR FUTURE VISITS TO THIS SITE

XI. TEAM MEMBERS

Checklist completed by (please print)	
Signature	
Date	Time



INITIAL INVESTIGATION FIELD REPORT

ERTS Number _____

SITE NAME _____

SITE LOCATION INFORMATION

Contact Person Name	Title	Phone No.
Mailing Address	City	Zip + 4
Site Location	Closest City	County
Quarter-Quarter _____	Section _____	Township _____
Longitude: Degree _____	Minute _____	Second _____
Latitude: Degree _____	Minute _____	Second _____

INSPECTION INFORMATION

Inspection Date	Inspection Time	Type of Entry Notice
Photographs	Yes <input type="checkbox"/> No <input type="checkbox"/>	Weather: Clear <input type="checkbox"/> Partly Cloudy <input type="checkbox"/> Overcast <input type="checkbox"/>
Videotape	Yes <input type="checkbox"/> No <input type="checkbox"/>	Precipitation _____ Temperature _____
Samples	Yes <input type="checkbox"/> No <input type="checkbox"/>	Wind Direction _____ Wind Speed _____

RECOMMENDATION

No Further Action:	
Release or threatened release does not pose a threat <input type="checkbox"/>	Site Hazard Assessment <input type="checkbox"/>
No release or threatened release <input type="checkbox"/>	Interim Action <input type="checkbox"/>
Educational mailing <input type="checkbox"/>	Emergency Action <input type="checkbox"/>
Refer to another program/agency <input type="checkbox"/>	Independent Cleanup Action <input type="checkbox"/>
	In Progress <input type="checkbox"/>
	Completed <input type="checkbox"/>
Name _____	
Comments _____	

DEPARTMENT REVIEW

Investigator _____	Date _____
Approved by:	
Unit Supervisor: _____	Date _____
Section Manager: _____	Date _____

OBSERVATIONS

Description of observations: _____

Description of past practices likely to be responsible for contamination: _____

Activities or practices responsible for contamination:

- | | | | |
|------------------------|--------------------------|-------------------|--------------------------|
| Spill | <input type="checkbox"/> | LUST | <input type="checkbox"/> |
| Pesticide disposal | <input type="checkbox"/> | Tank | <input type="checkbox"/> |
| Landfill | <input type="checkbox"/> | Improper handling | <input type="checkbox"/> |
| Drums | <input type="checkbox"/> | Improper disposal | |
| Other – Describe _____ | | | |

Are discharges permitted: No Yes
 If yes, describe _____

Standard Industrial Code(s)

CONTAMINANT(S)

AFFECTED MEDIA	CONTAMINANTS (#1-16: See contaminants key) Enter letter designating status of contaminant: AFF C = Confirmed, S = Suspected, P = Potential, R = Remediated, U = Unknown															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Ground Water																
Surface Water																
Drinking water																
Soil																
Sediment																
Air																

- | | | |
|------------------------------------|--------------------------------------|---|
| 1 Halogenated organic compounds | 7 Phenolic compounds | 13 Radioactive wastes |
| 2 Metals - Priority pollutants | 8 Non-halogenated solvents | 14 Conventional contaminants, organic |
| 3 Metals - Other | 9 Dioxin | 15 Conventional contaminants, inorganic |
| 4 Polychlorinated biPhenyls (PCBs) | 10 Polynuclear aromatic hydrocarbons | 16 Base/neutral organics |
| 5 Pesticides | 11 Reactive wastes | |
| 6 Petroleum products | 12 Corrosive wastes | |

SITE INFORMATION

Soil Type	Slope
Site vegetation/cover present:	
Forest <input type="checkbox"/>	Pasture/open field <input type="checkbox"/>
Bare soil <input type="checkbox"/>	Wetlands <input type="checkbox"/>
Brush <input type="checkbox"/>	Pavement <input type="checkbox"/>
Landscaped <input type="checkbox"/>	Surface water <input type="checkbox"/>
Other - Describe _____	
Are there any drinking water systems affected?	

Municipal, private, or both? (Circle one)	<input type="checkbox"/> Yes <input type="checkbox"/> No
How many people are estimated to be affected? _____	
Is there a potential for a release or threatened release to affect a drinking water source?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
Are there monitoring wells in the vicinity?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
Are there dry wells in the vicinity?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	

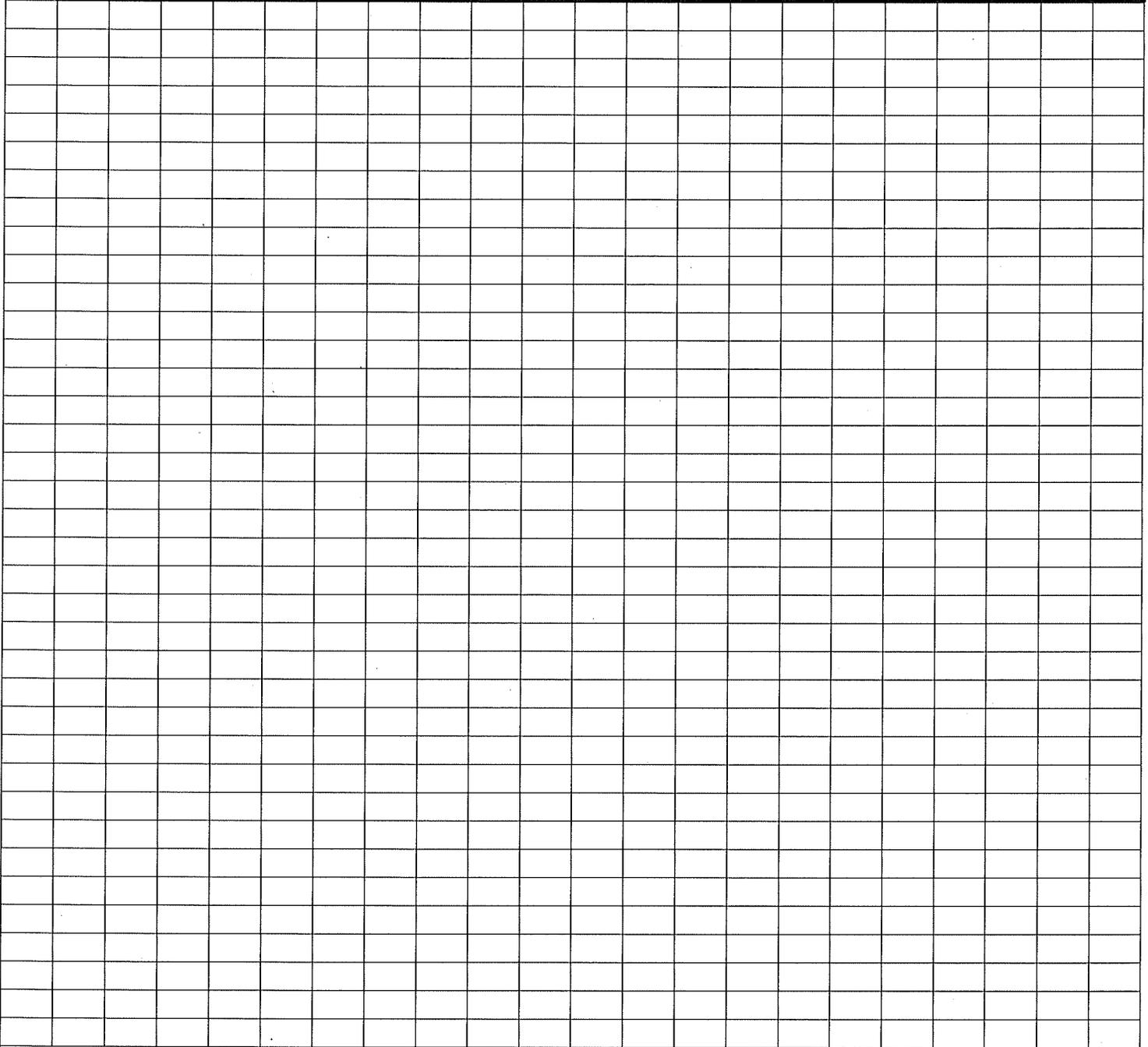
CONTAMINANT PATHWAYS AND TARGETS

	Ingestion	Inhalation	Contact
Ground Water			
Surface Water			
Drinking Water			
Soil			
Sediment			
Air			
Targets possible:			
Human, adult	<input type="checkbox"/>	Residential	<input type="checkbox"/>
Human, children	<input type="checkbox"/>	Industrial	<input type="checkbox"/>
		Commercial	<input type="checkbox"/>
Sensitive environments (See WARM Scoring Manual for definition):			
<input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, describe _____			

General Comments _____			

SITE MAP/DIAGRAM

Site Name



↑
North

Approximate scale: _____ inch = _____ feet

ERTS Number

County

Inspector

Date