



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

August 13, 1996

Mr. William Skwersky
Environmental Protection Specialist
HUD-PA State Office
Wanamaker Building
100 Penn Square East
Philadelphia, PA 19107

Subject: EPA Sole Source Aquifer Review of HUD Projects

Dear Mr. Skwersky:

Thank you for your call yesterday, as we briefly discussed what HUD projects EPA would review if located within a Sole Source Aquifer (SSA). The following guidelines should help you in determining which projects EPA is interested in reviewing under the SSA program, and which projects are not subject to review.

A project is considered for EPA SSA review if all three of the following questions can be answered with "yes":

- (1) is the project/action located in an area designated as a Sole Source Aquifer,
- (2) is the project/action partially federally funded, and
- (3) does the project/action have the potential to create a 'significant hazard to public health' by adversely impacting ground water either during construction or after completion and facility is in operation.

To assist you in evaluating question # 3, EPA considers the following projects to NOT pose a significant hazard to public health, and therefore are generally excluded from SSA review.

- (1) in urbanized areas (e.g., Philadelphia, PA and Wilmington, DE, etc.), single or multi-unit housing developments, community centers and schools that will use existing public water and sewer.
- (2) rehabilitations or improvements to infrastructure already in place, such as water and sewer line replacement, fire hydrant installations, curb cuts, building renovations that don't involve significant expansion, street light and sign installment, road repavement, etc.
- (3) individual loans/mortgages/grants made to homes/homeowners.
- (4) properties sold by the federal government.

Attachment 11

Printed on Recycled Paper



REC'D BY
AUG 16 2 03 PM '96

Projects that EPA will review under the SSA program are:

- (1) any facility that will store, transport, generate or use hazardous substances on site.
- (2) projects requiring new wastewater and sanitary sewer facilities.
- (3) projects at sites where past incidences of contamination are known to have occurred.
- (4) projects in suburban and country areas that will require substantial creation of impervious surfaces, such as parking lots, rest areas, roadways, etc.
- (5) facilities that will have on-site underground/above ground storage tanks.
- (6) facilities in unsewered areas that will require a septic system that will serve 50 or more people.
- (7) projects requiring an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA).
- (8) projects that may impact wetlands or other critical habitat such as areas with threatened, rare or endangered species.
- (9) projects requiring the addition or deletion of water in large quantities from the aquifer due to major changes in surface drainage patterns or withdrawal from the aquifer.
- (10) solid waste disposal sites
- (11) new airports or expansion, such as runway extensions
- (12) energy related projects

If it is unclear whether the proposed project/action will significantly impact the aquifer, feel free to consult with EPA on whether the project should be evaluated for impacts.

The list of projects EPA will review includes non-HUD projects in case you want to share this list with other agencies that you work with that may have questions about SSA review.

If you have any questions in the future, please call me at (215) 566-5786.

Sincerely,



Barbara Smith
SSA Project Manager