

4.5.6 Existing Quality of Surface Waters and Surface Soils, Including Other Sources of Contamination and Their Cumulative Effect on Surface Waters and Surface Soils

This information should be included in the environmental and risk assessments. The information presented probably will be a combination of information from state reports, USDA soil survey reports, and analytical data obtained from sampling and analysis upgradient and down gradient of the unit. The discussion must certify that there are no other sources of contamination or provide a detailed discussion of other sources of contamination and the types of hazardous constituents being released. The discussion also must include information about

interactions among hazardous constituents released by the units and other hazardous constituents and their effects on surface waters, wetlands, and soils.

Typical information deficiencies the permit writer may identify in the discussion provided include:

- A lack of discussion of potential cumulative effects of contamination from the unit on soil, surface waters, or wetlands
- A lack of adequate discussion of the current soil or water quality