



Environmental Fact Sheet

EPA Issues Final Rules for Corrective Action Management Units and Temporary Units

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EPA's Corrective Action Program

Subtitle C of the 1976 Resource Conservation and Recovery Act (RCRA) created a comprehensive program for the safe management of hazardous wastes. In 1984, Congress passed the Hazardous and Solid Waste Amendments (HSWA), which mandated even stricter standards for the regulation of hazardous wastes. One of the key provisions of HSWA was the authority provided to EPA to compel "corrective action" for environmental problems that have resulted from historic waste management practices at hazardous waste facilities.

Since 1984, corrective action has become a major part of the RCRA program. More than 800 facilities are now in the process of investigating and cleaning up contamination problems. EPA estimates that as many as 4,000 RCRA facilities may eventually need some type of corrective action.

The actual cleanup of these facilities, as with Superfund sites, often involves excavating and managing large volumes of hazardous wastes, including contaminated soils, debris, sludges and other wastes. These cleanup wastes are subject to the same set of RCRA regulations that apply to management of newly generated hazardous wastes. However, EPA's experience with implementing the corrective action program has shown that application of these uniform, national standards has often been counterproductive when applied to the cleanup of individual sites. In many cases, the application of these standards, such as the RCRA land disposal restrictions (LDRs), has forced EPA to select remedies that are environmentally less effective and reliable, and in some cases more expensive, than alternative remedies that could otherwise have been available. For example, treatment



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standards requiring incineration often preclude the use of other effective treatment technologies that could be used in achieving a protective cleanup for a site.

Action Being Taken

In order to address these problems, EPA has finalized regulations that provide for the use of corrective action management units (CAMUs) when cleaning up sites under RCRA and Superfund. Use of the CAMU concept under these regulations will ensure cleanups that are fully protective, yet better tailored to actual site conditions. Under the rule, appropriate treatment requirements will be determined as part of the overall cleanup plan for a particular site. This is expected to result in more expeditious cleanups, and will promote the use of new, innovative treatment technologies. The use of CAMUs should decrease the volumes of cleanup wastes that must be incinerated, and increase the use of alternative treatment technologies that are appropriate for actual site and waste characteristics. In addition, EPA expects the new rule to result in less waste being hauled off-site, and overall, more treatment of greater volumes of cleanup wastes

The CAMU regulations contain important restrictions and safeguards that ensure the rule will be used to achieve more protective and effective cleanups. For example, newly generated process wastes cannot be managed in CAMUs, nor can wastes that originate from other clean-up sites. Technical requirements for groundwater monitoring, closure, and post-closure are also specified. In addition, the rule requires thorough public review and comment on CAMU decisions.

Based on the Regulatory Impact Analysis conducted for this rule, the use of

Glossary and Acronyms

Corrective Action Management Unit (CAMU)

An area within a facility that is designated for the management of remediation wastes generated during the implementation of specific corrective action requirements. CAMUs can only be designated by the EPA Regional Administrator.

Temporary Unit (TU): Temporary tanks and/or container storage area used solely for treatment or storage of hazardous remediation wastes during specific remediation activities. Designated by the Regional Administrator, such units must conform to specific standards, and may only be in operation for a pre-specified period of time.

Remediation Wastes: All solid and hazardous wastes, and all media (including ground water, surface water, soils and sediments) and debris that contain listed hazardous wastes, or which themselves exhibit a characteristic, that are managed for the purpose of implementing corrective action requirements.

Land Disposal Restrictions: A series of regulations restricting the land disposal (placement in or on land) of hazardous wastes as mandated by the 1984 HSWA amendments.

In Situ: In place.

RCRA: The Resource Conservation and Recovery Act, enacted in 1976.

HSWA: The Hazardous and Solid Waste Amendments, enacted in 1984.

CERCLA: Comprehensive Environmental Response, Compensation, and Liability Act. Also known as "Superfund". Enacted in 1980

SWMU: Solid Waste Management Unit

TSDF: Treatment Storage and Disposal Facility

RFA: RCRA Facility Assessment

MTRs: Minimum Technology Requirements

the CAMU concept is also expected to result in billions of dollars of cost savings for industry and Federal agencies.

In addition to the CAMU provisions, the final rule also will allow regulatory agencies to approve "temporary units" for remedial purposes. This provision will allow regulatory agencies to modify design standards for tanks and container storage units that are used for short-term treatment or management of remediation wastes.

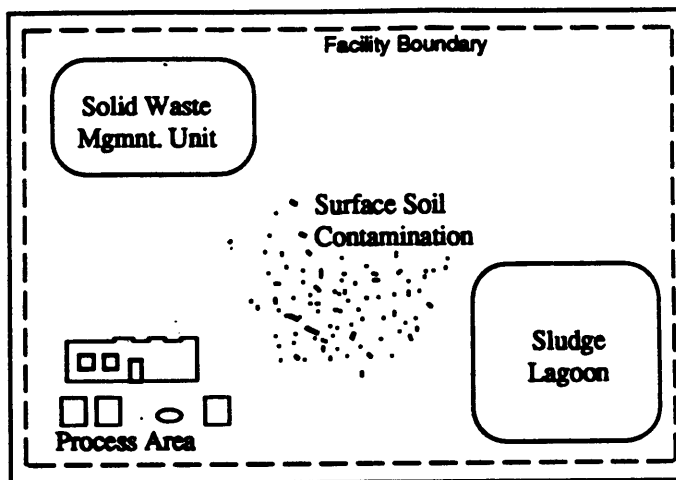
State Applicability

This rule will take effect shortly after publication, in States where EPA is implementing the RCRA corrective action program. In other States, the rules will not take effect until they are adopted by the State legislatures. Since the rule is considered "less stringent," adopting the CAMU rules will not be mandatory. However, EPA strongly encourages States to adopt these regulations.

Example 1

Before Remedial Activities

The remedial goal at this facility is to 1) treat and contain contaminated surface soil from the site, and (2) to stabilize and contain sludge wastes from the leaking sludge lagoon. In this case, the two waste streams have very different characteristics and require different treatment processes. In addition, they will require different ultimate containment methods.



After Designating CAMUs

(A) To allow for these differing waste characteristics and to minimize further contamination, the regulatory officials have designated two separate CAMUs to deal with the two remediation waste streams.

(B) Remediation wastes from the contaminated surface soil of the facility will be treated in treatment unit #1 and remediation wastes from the lagoon will be treated in unit #2. Both units may be temporary units authorized specifically for the remediation process.

(C) Treatment residuals can be placed in each CAMU without triggering the Land Disposal Restrictions. Each CAMU must be protective of human health and the environment. For the sludge lagoon (now CAMU #2), this may mean retrofitting the unit, even though it would not necessarily need to meet minimum technology requirements.

