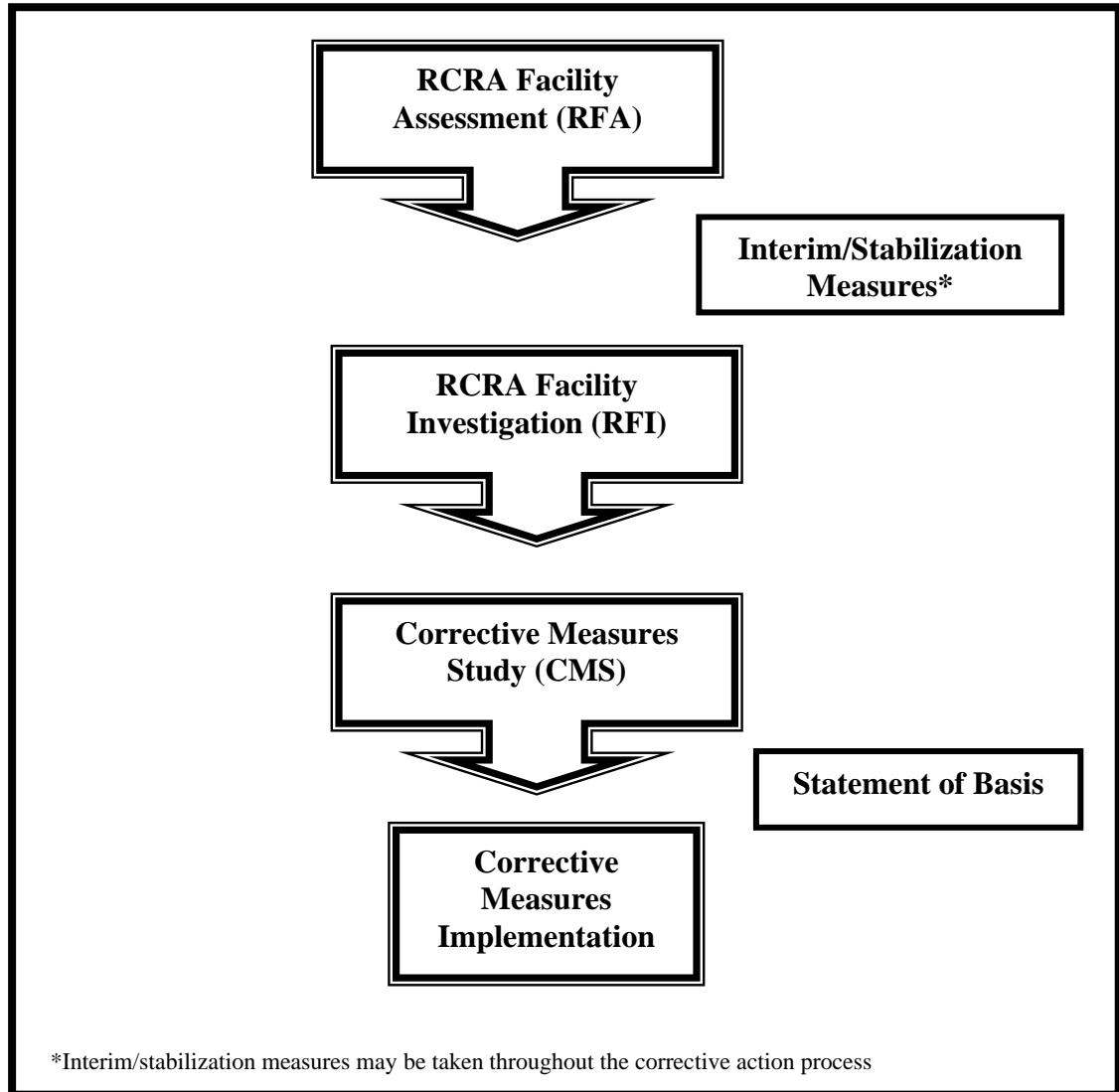


Figure A. Flowchart of the RCRA Corrective Action Process



Corrective Action Process

The corrective action process generally comprises six activities. These activities are not always undertaken as a linear progression towards final facility cleanup, but can be implemented flexibly to most effectively meet site-specific corrective action needs. Figure A shows a flowchart of the corrective action process.

1. RCRA Facility Assessment (RFA)

Often the first activity in the corrective action process is the RFA. The objective of the RFA is to identify potential and actual releases from SWMUs/AOCs and make

preliminary determinations about releases, the need for corrective action, and interim measures.

2. RCRA Facility Investigation (RFI)

The RFI takes place when releases, or potential releases, have been identified and further investigation is necessary. The purpose of the RFI is to gather enough data to fully characterize the nature, extent, and rate of migration of contaminants to determine the appropriate response action.

A site-wide risk assessment is also conducted as part of the RFI. The risk assessment studies the health risks from potential exposure to the contaminants at the site.

3. Corrective Measures Study (CMS)

After the RFI is completed and the regulatory agency determines that cleanup is necessary, the regulatory agency may require the owner/operator to conduct a CMS. The purpose of the CMS is to identify and evaluate cleanup alternatives, called corrective measures, for releases at the facility. The recommended measures are reviewed by the regulatory agency. The regulatory agency then selects what it believes is the best remedy, given the site-specific considerations.

4. *Statement of Basis*

After review of the CMS, the Department produces a document which describes the basis for remedy selection and provides the public with an opportunity to comment on the proposed remedies. Following public input, the remedy is finalized and included in the permit. When selecting remedies the following are considered: short- and long-term reliability and effectiveness; reduction of toxicity, mobility, or volume of hazardous constituents; implementability; and costs. In addition, proposed remedies must satisfy the following criteria:

- Be protective of human health and the environment;

- Control the sources of releases thereby reducing or eliminating, to the maximum extent practicable, further releases posing a threat to public health and the environment;
- Attain media clean-up standards; and
- Comply with applicable waste management standards.

5. Corrective Measures Implementation (CMI)

Once a remedy has been selected, the facility enters the CMI phase of corrective action. During the CMI, the owner/operator of the facility implements the chosen remedy.

6. *Interim/Stabilization Measures*

Stabilization measures can be implemented at any time in the corrective action process to address ongoing releases and environmental threats in the near-term. Stabilization measures are established in an effort to control or abate immediate threats to human health and the environment and prevent or minimize the further spread of contamination.