

APPENDIX IV-C CORRECTIVE MEASURE STUDY OUTLINE

The purpose of the corrective measure study (CMS) portion of the RCRA corrective action process is to identify and evaluate potential remedial alternatives for the releases of hazardous constituents that have been identified at the Facility through the RFI or other investigations to need further evaluation. The scope and requirements of the CMS are balanced with the expeditious initiation of remedies and rapid restoration of contaminated media. The scope and requirements of the CMS should be focused to fit the complexity of the site-specific situation. It is anticipated that Permittee's with sites with complex environmental problems may need to evaluate a number of technologies and corrective measure alternatives. For other facilities, however, the evaluation of a single corrective measure alternative may be adequate. Therefore, a streamlined or focused approach to the CMS may be initiated. Information gathered during any stabilizations or interim measures will be used to augment the CMS and in cases where corrective action goals are met, may be a substitute for the final CMS.

Regardless of whether a streamlined/focused or a detailed CMS is required, a CMS Work Plan and CMS Report are generally required elements. The requirements for a full, detailed CMS are listed below. The New Mexico Environment Department (NMED) has the flexibility not to require sections of the plan and/or report, where site-specific situations indicate that all requirements are not necessary. Additionally, the NMED may require additional studies besides those discussed below in order to support the CMS.

I. CORRECTIVE MEASURES STUDY WORK PLAN

A. Elements of the CMS Work Plan

The Corrective Measures Study Work Plan shall include at a minimum the following elements:

1. A brief site-specific description of the overall purpose of the CMS;
2. A brief description of the corrective measure objectives, including proposed target media cleanup standards (e.g., promulgated Federal and State standards) and preliminary points of compliance or a description of how a risk assessment will be performed (e.g., guidance documents);
3. A brief description of the specific corrective measure technologies and/or corrective measure alternatives which will be studied;
4. A brief description of the general approach to investigating and evaluating potential corrective measures;

5. A detailed description of any proposed pilot, laboratory and/or bench scale studies;
6. A proposed outline for the CMS Report including a description of how information will be presented;
7. A brief description of overall project management including overall approach, levels of authority (include organization chart), lines of communication, project schedules, budget and personnel. Include a description of qualifications for personnel directing or performing the work;
8. A project schedule that specifies all significant steps in the process and when key documents (*e.g.*, CMS Progress Reports, draft CMS Report) are to be submitted to the NMED; and
9. A detailed Public Involvement Plan.

II. CORRECTIVE MEASURES STUDY (CMS) REPORT

The detail of a CMS may vary based upon the complexity of the site, on-going Interim Measures, etc. However, the CMS Report may include the following elements:

A. Introduction/Purpose

The Permittee shall describe the purpose of the CMS Report and provide a summary description of the project.

B. Description of Current Situation

The Permittee shall submit a summary and an update to the information describing the current situation at the Facility and the known nature and extent of the contamination as documented by the RCRA Facility Investigation (RFI) Report. This discussion should concentrate on those issues which could significantly affect the evaluation and selection of the corrective measures alternative(s). The Permittee shall provide an update to information presented in the RFI regarding previous response activities and interim measures which have been, or are being implemented at the Facility. The Permittee shall also make a facility-specific statement of the purpose for the response, based on the results of the RFI. The statement of purpose should identify the actual or potential exposure pathways that should be addressed by corrective measures.

C. Establishment of Proposed Media Specific Cleanup Standards

The Permittee shall describe the proposed media cleanup standards and point of compliance. The standards must be either background, promulgated Federal and State standards or risk-derived standards. If media clean-up standards are not proposed, then NMED will unilaterally propose setting media clean-up standards to either background, promulgated Federal and State standards or the most conservative risk-derived standards.

D. Identification, Screening and Development of Corrective Measure Technologies

1. Identification: List and briefly describe potentially applicable technologies for each affected media that may be used to achieve the corrective action objectives. Include a table that summarizes the available technologies.

The Permittee should consider innovative treatment technologies, especially in situations where there are a limited number of applicable corrective measure technologies.

2. Screening: The Permittee shall screen the corrective measure technologies to eliminate those that may prove infeasible to implement, that rely on technologies unlikely to perform satisfactorily or reliably, or that do not achieve the corrective measure objective within a reasonable time period. This screening process focuses on eliminating those technologies which have severe limitations for a given set of waste and site-specific conditions. The screening step may also eliminate technologies based on inherent technology limitations.

Site, waste, and technology characteristics which are used to screen inapplicable technologies are described in more detail below:

- a. *Site Characteristics:* Site data should be reviewed to identify conditions that may limit or promote the use of certain technologies. Technologies whose use is clearly precluded by site characteristics should be eliminated from further consideration.
- b. *Waste Characteristics:* Identification of waste characteristics that limit the effectiveness or feasibility of technologies is an important part of the screening process. Technologies clearly limited by these waste characteristics should be eliminated from consideration. Waste characteristics particularly affect the

feasibility of in situ methods, direct treatment methods, and land disposal (on/off-site).

- c. **Technology Limitations:** During the screening process, the level of technology development, performance record, and inherent construction, operation, and maintenance problems should be identified for each technology considered. Technologies that are unreliable, perform poorly, or are not fully demonstrated may be eliminated in the screening process. For example, certain treatment methods have been developed to a point where they can be implemented in the field without extensive technology transfer or development.
3. ***Corrective Measure Development:*** The Permittee shall assemble the technologies that pass the screening step into specific alternatives that have the potential to meet the corrective action objectives for each media. Options for addressing less complex sites could be relatively straightforward and may only require evaluation of a single or limited number of alternatives. Each alternative may consist of an individual technology or a combination used in sequence (i.e., treatment train). Different alternatives may be considered for separate areas of the Facility, as appropriate. List and briefly describe each corrective measure alternative.

E. Evaluation of a Final Corrective Measure Alternative

For each remedy which warrants a more detailed evaluation (i.e., those that passed through the screening step), including those situations when only one remedy is being proposed, the Permittee shall provide detailed documentation of how the potential remedy will comply with each of the standards listed below. These standards reflect the major technical components of remedies including cleanup of releases, source control and management of wastes that are generated by remedial activities. The specific standards are as follows:

1. Protect human health and the environment.
2. Attain media cleanup standards set by NMED.
3. Control the source of releases so as to reduce or eliminate, to the extent practicable, further releases that may pose a threat to human health and the environment.
4. Comply with applicable standards for management of wastes.
5. Other factors.

In evaluating the selected alternative or alternatives, the Permittee shall prepare and submit information that documents that the specific remedy will meet the

standards listed above. The following guidance should be used in completing this evaluation.

1. Protect Human Health and the Environment

Corrective action remedies must be protective of human health and the environment. Remedies may include those measures that are needed to be protective, but are not directly related to media cleanup, source control or management of wastes. An example would be a requirement to provide alternative drinking water supplies in order to prevent exposures to releases from an aquifer used for drinking water purposes. Therefore, the Permittee shall provide a discussion of any short term remedies necessary to meet this standard, as well as discuss how the corrective measures alternatives meet this standard.

2. Attain Media Cleanup Standards

Remedies will be required to attain media cleanup standards. As part of the necessary information for satisfying this requirement, the Permittee shall address whether the potential remedy will achieve the remediation objectives. An estimate of the time frame necessary to achieve the goals shall be included. Contingent remedies may be proposed if there is doubt if the initial remedy will be successful (*e.g.*, contingent remedies to innovative technologies).

3. Control of Sources of Releases

The Permittee shall address the issue of whether source control measures are necessary, and if so, the type of actions that would be appropriate. Any source control measure proposed should include a discussion on how well the method is anticipated to work given the particular situation at the CSU, and the known track record of the specific technology.

4. Comply With any Applicable Standards for Management of Wastes

The Permittee shall include a discussion of how the specific waste management activities will be conducted in compliance with all applicable State and Federal regulations (*e.g.*, closure requirements, LDRs).

5. Other Factors

There are five general factors that will be considered as appropriate by NMED in selecting/approving a remedy that meets the four standards listed above. These five decision factors include:

- a. *Long-term reliability and effectiveness;*
- b. *Reduction in the toxicity, mobility or volume of wastes;*
- c. *Short-term effectiveness;*
- d. *Implementability; and*
- e. *Cost.*

Examples of the type of information to include are provided below:

- a. *Long-term reliability and effectiveness:* The Permittee may consider whether the technology, or combination of technologies, have been used effectively under analogous site conditions, whether failure of any one technology in the alternative would have any immediate impact on receptors, and whether the alternative would have the flexibility to deal with uncontrollable changes at the site. Operation and maintenance requirements include the frequency and complexity of necessary operation and maintenance. In addition, each corrective measure alternative should be evaluated in terms of the projected useful life of the overall alternative and of its component technologies. Useful life is defined as the length of time the level of effectiveness can be maintained.
- b. *Reduction in the toxicity, mobility or volume of wastes:* As a general goal, remedies will be preferred that employ techniques that are capable of eliminating or substantially reducing the potential for the wastes in SWMUs and/or contaminated media at the Facility to cause future environmental releases. Estimates of how the corrective measure alternative will reduce toxicity, mobility and or volume of the waste is required and may be accomplished through a comparison of initial site conditions to expected post-corrective measures conditions.
- c. *Short-term effectiveness:* The Permittee shall evaluate each corrective measure alternative for short-term effectiveness. Possible factors to consider are fire, explosion, exposure to hazardous constituents and potential threats associated with the

- treatment, excavation, transportation and re-disposal or containment of the waste material.
- d. *Implementability*: Information to consider when assessing implementability include:
- i. The administrative activities needed to implement the corrective measure alternative (e.g. permits, rights of way, etc.) and the length of time these activities will take;
 - ii. The constructibility, time for implementation, and time for beneficial results;
 - iii. The availability of adequate off-site treatment, storage capacity, disposal services, needed technical services and materials; and
 - iv. The availability of prospective technologies for each corrective measure alternative.
- e. *Cost*: The Permittee shall develop an estimate of the cost of each corrective measure alternative (and for each phase or segment of the alternative). The cost estimate shall include both capital and operation and maintenance costs. The capital costs shall include, but are not limited to, costs for: engineering, site preparation, construction, materials, labor, sampling/analysis, waste management/disposal, permitting, health and safety measures, etc. The operation and maintenance costs shall include labor, training, sampling and analysis, maintenance materials, utilities, waste disposal and/or treatment, etc. Costs shall be calculated as the net present value of the capital and operation and maintenance costs.

F. Justification and Recommendation of the Corrective Measure or Measures

The Permittee shall justify and recommend in the CMS Report a corrective measure alternative for consideration by NMED. Such a recommendation should include a description and supporting rationale for the preferred alternative that is consistent with the corrective action standards and remedy selection decision factors discussed above. In addition, this recommendation shall include summary tables which allow the alternative or alternatives to be understood easily. Trade-offs among health risks, environmental effects, and other pertinent factors shall be highlighted. The Secretary will select the corrective measure alternative or alternatives to be implemented based on the results presented in the CMS Report.