

## ATTACHMENT 5

### SCOPE OF WORK FOR A CORRECTIVE MEASURES STUDY

#### PURPOSE

The purpose of the Corrective Measures Study (CMS) is to identify and evaluate potential remedial alternatives to address contaminant releases from a facility.

#### SCOPE

A Corrective Measures Study Workplan and a Corrective Measures Study Report are, unless otherwise specified by the Department of Toxic Substances Control (Department), required elements of the CMS. The Scope of Work (SOW) for the Corrective Measures Study Workplan and Report describe what should be included in each document. The SOWs are intended to be flexible documents capable of addressing both simple and complex site situations. If the Owner/Operator or Respondent can justify, to the satisfaction of the Department, that sections of a plan and/or report are not needed in the given site specific situation, then the Department may waive that requirement.

The scope and substance of the CMS should be focused to fit the complexity of the site-specific situation. It is anticipated that Owner/Operator's or Respondent's of sites with complex environmental problems may need to evaluate a number of technologies and corrective measure alternatives. For other facilities, however, it may be appropriate to evaluate a single corrective measure alternative.

The Department may require the Owner/Operator or Respondent to conduct additional studies beyond what is discussed in the SOWs in order to support the CMS. The Owner/Operator or Respondent will furnish all personnel, materials and services necessary to conduct the additional tasks. The SOW for the Corrective Measures Study Workplan and Report are specified below:

#### A. Corrective Measures Study Workplan

The purpose of the Corrective Measures Study (CMS) Workplan is to specify how the CMS Report will be prepared. The CMS Workplan shall, at a minimum, include the following elements:

1. A brief project summary;
2. A site-specific description of the overall purpose of the CMS;

3. A description of the proposed media cleanup standards and points of compliance that will be used in the corrective measures study report. Include the justification and supporting rationale for the proposed media cleanup standards and points of compliance. The proposed media cleanup standards must be based on available promulgated federal and state cleanup standards, risk based analysis, data and information gathered during the corrective action process (e.g., from RCRA Facility Investigation, etc.), and/or information from other applicable guidance documents. The Department may require that the Owner/Operator or Respondent conduct a risk assessment to gather information for establishing cleanup standards. Based on the CMS Report and other information including public comments, the Department will establish final cleanup standards and points of compliance as part of the remedy selection process.
4. A description of the specific corrective measure technologies and/or corrective measure alternatives which will be studied;
5. A description of the general approach to investigating and evaluating potential corrective measures;
6. A detailed description of any proposed treatability, pilot, laboratory and/or bench scale studies. Proposed studies must be further detailed in either the CMS Workplan or in separate workplans. Submittal times for separate workplans must be included in the CMS Workplan project schedule;
7. A proposed outline for the CMS Report including a description of how information will be presented;
8. A description of overall project management including overall approach, levels of authority (include organization chart), lines of communication, budget and personnel. Include a description of qualifications for personnel directing or performing the work; and
9. A project schedule that specifies all significant steps in the process and when key documents (e.g., CMS Report) are to be submitted to the Department.

## **B. Corrective Measures Study Report**

The CMS Report shall, at a minimum, include the following elements:

### **1. Introduction/Purpose**

Describe the purpose and intent of the document.

### **2. Description of Current Conditions**

The Owner/Operator or Respondent shall include a brief discussion of any new information that has been developed since the RCRA Facility Investigation Report was finalized. This discussion should concentrate on those issues which could significantly affect the evaluation and selection of the corrective measure alternative(s).

### **3. Proposed Media Cleanup Standards**

The Owner/Operator or Respondent shall describe and justify the proposed media cleanup standards and points of compliance.

### **4. Identification and Screening of Corrective Measure Technologies**

#### **a. Identification**

List and briefly describe potentially applicable technologies for each affected media that may be used to achieve the media cleanup standards. The Owner/Operator or Respondent should consider including a table that summarizes the available technologies.

The Owner/Operator or Respondent should consider innovative treatment technologies, especially in situations where there are a limited number of applicable corrective measure technologies. Innovative technologies are defined as those technologies for source control other than incineration, solidification/stabilization and pumping with conventional treatment for contaminated ground water. Innovative treatment technologies may require extra initial effort to gather information, analyze options and to adapt the technology to site specific situations. However, in the long run, innovative treatment technologies could be more cost effective. Treatability studies and on-site pilot scale studies may be necessary for evaluating innovative treatment technologies.

#### **b. Screening**

Technologies must be screened to eliminate those that may prove

unfeasible to implement given the existing set of waste and site-specific conditions. The screening is accomplished by evaluating technology limitations (e.g., for volume, area, contaminant concentrations, interferences, etc.) and using contaminant and site characterization information from the RCRA Facility Investigation to screen out technologies that cannot be fully implemented at the facility. The screening process must focus on eliminating those technologies which have severe limitations for a given set of waste and site-specific conditions (e.g., depth to ground water and aquitards). As with all decisions during the CMS, the screening of technologies must be fully documented. This is especially true if the screening step indicates that only one corrective action technology should proceed to the next step and be evaluated in detail. List the corrective action technologies selected for further evaluation. Also document the reasons for excluding any corrective action technologies. The Owner/Operator or Respondent should consider including a table that summarizes the findings.

## **5. Corrective Measure Alternative Development**

Assemble the technologies that pass the screening step into specific alternatives that have potential to meet the corrective action objectives. 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 of technologies used in sequence (e.g., treatment train). Depending on the site specific situation, different alternatives may be considered for separate areas of the facility. List and briefly describe each corrective measure alternative.

## **6. Evaluation of Corrective Measure Alternatives**

The four corrective action standards and five remedy selection decision factors described below shall be used to evaluate the corrective measure alternatives. All alternatives must meet the corrective action standards before the remedy selection decision factors are used for further evaluation.

The corrective action standards are as follows:

- o Be protective of human health and the environment;
- o Attain media cleanup standards;
- o Control the source(s) of releases in order to reduce or eliminate, to the extent practicable, further releases of hazardous wastes (including hazardous constituents) that may pose a threat to human health and the environment; and

- o Comply with any applicable federal, state, and local standards for management of wastes.

The remedy selection decision factors are as follows:

- o Short- and Long-Term Effectiveness;
- o Reduction of Toxicity, Mobility and/or Volume;
- o Long-Term Reliability;
- o Implementability; and
- o Cost.

The corrective action standards and decision factors are described in further detail below.

a. Be Protective of Human Health and the Environment

Describe in detail how each corrective measure alternative is protective of human health and the environment.

This standard for protection of human health and the environment is a general mandate of the RCRA statute. The standard requires that remedies include any measures that are needed to be protective. These measures may or may not be 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 a contaminated drinking water supply.

b. Attain Media Cleanup Standards

Describe in detail the ability of each corrective measure alternative to meet the proposed media cleanup standards.

c. Control the Sources of Releases

Describe in detail the ability of each corrective measure alternative to control the sources of releases.

A critical objective of any remedy must be to stop further environmental degradation by controlling or eliminating further releases that may pose a threat to human health and the environment. Unless source control measures are taken, efforts to cleanup releases may be ineffective or, at best, will essentially involve a perpetual cleanup. Therefore, an effective

source control program is essential to ensure the long-term effectiveness and protectiveness of the corrective action effort.

The source control standard is not intended to mandate a specific remedy or class of remedies. Instead, the Owner/Operator or Respondent is encouraged to examine a wide range of options. This standard should not be interpreted to preclude the equal consideration of using other protective remedies to control the source, such as partial waste removal, capping, slurry walls, in-situ treatment/stabilization and consolidation.

d. Comply With Any Applicable Standards for Management of Wastes

Discuss how any specific waste management activities will be conducted in compliance with all applicable state or federal regulations (e.g., CAMU closure requirements, land disposal restrictions).

e. Short- and Long-Term Effectiveness

Each corrective measure alternative must be evaluated with regard to its effectiveness in protecting human health and the environment and meeting the proposed media cleanup standards. Both short- and long-term components of effectiveness must be evaluated; short-term referring to the construction and implementation period, and long-term referring to the period after the remedial action is complete. Estimate approximately how much time it will take to implement each corrective measure alternative, the length of time before initial beneficial results are obtained, and the length of time required to achieve the proposed media cleanup standards.

The evaluation of short-term effectiveness must include possible threats to the safety of nearby communities, workers, and environmentally sensitive areas (e.g., oceans, wetlands) during construction of the corrective measure alternative. Factors to consider are fire, explosion, exposure to hazardous substances and potential threats associated with treatment, excavation, transportation and re-disposal or containment of waste material. Laboratory and/or field studies are extremely useful in estimating the effectiveness of corrective measures and should be used whenever possible.

The evaluation of long-term effectiveness must include possible threats to the safety of nearby community workers, and environmentally sensitive areas (e.g., oceans, wetlands) during operation of the corrective measure alternative.

f. Reduction of Toxicity, Mobility and/or Volume

Each corrective measure alternative must be evaluated for its ability to reduce the toxicity, mobility, and/or volume of the contaminated media. Reduction in toxicity, mobility, and/or volume refers to changes in one or more characteristics of the contaminated media by the use of corrective measures that decrease the inherent threats associated with the media.

Estimate how much the corrective measure alternative will reduce the waste toxicity, volume and/or mobility (compare initial site conditions to post-corrective measure conditions). In general, the Department strongly prefers corrective measures that have a high degree of permanence and reduce the contaminant toxicity, mobility and volume through treatment.

g. Long-Term Reliability

Each corrective measure alternative must be evaluated with regards to its long-term reliability. This evaluation includes consideration of operation and maintenance requirements.

Demonstrated and expected reliability is a way of assessing the risk and effect of failure. Discuss whether the technology or combination of technologies have been used effectively together under analogous site conditions, whether failure of any one technology in the alternative has an impact on receptors or contaminant migration, and whether the alternative would have the flexibility to deal with uncontrollable changes at the site (e.g., heavy rain storms, earthquakes, etc).

Operation and maintenance requirements include the frequency and complexity of necessary operation and maintenance. Technologies requiring frequent or complex operation and maintenance activities should be regarded as less reliable than technologies requiring little or straightforward operation and maintenance. The availability of labor and materials to meet these requirements must also be considered.

Most corrective measure technologies, with the exception of destruction, deteriorate with time. Often, deterioration can be slowed through proper system operation and maintenance, but the technology eventually may require replacement. Each corrective measure alternative shall 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 necessary or required level of effectiveness can be maintained.

h. Implementability of Corrective Measure Alternatives

The implementability criterion addresses the technical and administrative

feasibility of implementing a corrective measure alternative and the availability of various services and materials needed during implementation. Each corrective measure alternative must be evaluated using the following criteria:

**Construction and Operation:** Corrective measure alternatives must be feasible to implement given the existing set of waste and site-specific conditions. This evaluation was initially done for specific technologies during the screening process and is addressed again in this detailed analysis of the alternative as a whole. It is not intended that the screening process be repeated here, but instead to highlight key differences and/or changes from the screening analysis that may result from combining technologies.

**Administrative Feasibility:** Discuss the administrative activities needed to implement the corrective measure alternative (e.g., permits, public acceptance, rights of way, off-site approvals, etc.).

**Availability of Services and Materials:** Discuss the availability of adequate off-site treatment, storage capacity, disposal services, needed technical services and materials, and the availability of prospective technologies for each corrective measure alternative.

i. Cost

Develop a preliminary cost estimate for 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. Include a description of how the costs were estimated and what assumptions were used.

- o The preliminary capital cost estimate must consider all key costs including, at a minimum, costs for engineering, mobilization, demobilization, site preparation, construction, materials, labor, equipment purchase and rental, sampling, analysis, waste disposal, permitting and health and safety measures.
- o The preliminary operation and maintenance cost estimate must consider all key costs including, at a minimum, costs for labor, training, sampling, analysis, maintenance materials, utilities, waste disposal, waste treatment, permitting and health and safety measures.
- o Calculate the net present value of preliminary capital and operation and maintenance costs for each corrective measure alternative.

**7. Owner/Operator or Respondent's Recommended Corrective Measure Alternative**

The Owner/Operator or Respondent may recommend a preferred corrective measure alternative for consideration by the Department. 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.

Based on the CMS Report and other information including public comments, the Department will establish final cleanup standards, points of compliance and will select a final remedy for the facility.