

DTSC's Removal Action Work Plan (RAW) Quick Reference Guide

A Removal Action Work Plan (RAW) is one of two types of cleanup selection documents that may be prepared for a site, pursuant to Health and Safety Code Section 25356.1. It applies to cleanups that are projected to cost less than two million dollars.

A RAW may be required when DTSC determines, based on information obtained during characterization activities, that further action is required to address contamination at levels that pose a health risk to existing and/or future property users or that may be an ongoing source of contamination to the environment. Cleanup goals established in the RAW must be compatible with current and planned uses and ensure protection of human health and the environment. Contaminated sites are generally cleaned up to levels that allow for unrestricted, commercial/industrial, or recreational uses. A deed restriction ([Land Use Covenant](#)) will be required for cleanups that do not meet unrestricted use levels.

RAW Objectives

- Present and evaluate existing site conditions;
- Establish appropriate cleanup goals;
- Evaluate alternatives; and
- Identify recommended alternative that is protective of human health and the environment.

RAW [Public Participation Requirements](#)

Specific requirements will vary, but generally if there are no special circumstances, DTSC follows California Health and Safety Code Sections 25358.7, 25356.1(e), and 25395.96(1).

1. Conduct a survey to determine community needs and preferences
2. Develop a mailing list, approx. ¼ mile radius around the site
3. Hold a public comment period and invite community feedback
4. Develop and distribute an informational flyer
5. Publish a notice in local newspapers
6. Revise the RAW based on comments received

DTSC will approve the cleanup document for implementation upon completion of the public outreach processes and other statutory requirements.

RAW Content

- Site Description – Include current site conditions, ownership and operational history, site characterization activities conducted, any response actions taken, nature and extent of contamination, and risk assessment/evaluation.
- **Conceptual Site Model (CSM)** – Discussion of the relationship between contaminant sources and receptors through migration and exposure paths.
- Removal Action Objectives (RAOs) – Identify goals or objectives to be achieved by the removal action.
- Identify Removal Action Alternatives – Develop and analyze removal action alternatives, at a minimum, consider effectiveness, implementability, and cost.
- Engineering Evaluation/Cost Analysis (EE/CA) – Provide a comparison of alternatives, technical and cost evaluation, selection of a preferred alternative, and explanation of the basis for the selection.
- Implementation Details – Include details on all aspects of removal action implementation, including confirmation sampling and waste disposal.
- Sampling and Analysis Plan – Provide confirmation sampling, along with corresponding Quality Assurance Plan to confirm effectiveness of RAW, if applicable.
- Long Term Stewardship – Describe deed restrictions and any operation & maintenance requirements, if applicable.
- Health and Safety Plan – Outline methods that will be employed during the removal action to ensure the health and safety of workers and the public.
- Schedule of Activities – Include a detailed project schedule.
- Public Involvement Process – Describe public participation activities.
- **California Environmental Quality Act** – Outline the CEQA approach for the removal action.
- Administrative Record – Provide a list of all documents and information relied on or considered during the removal action selection process