



MANAGING RCRA CORRECTIVE ACTION

2020 CONSTRUCTION COMPLETE GOAL

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6/13/2018





BCM Cases - Require NJDEP Approvals

- **RCRA GPRA 2020**
 - EPA Lead (12 sites) - No LSRP Required
 - DEP Lead - LSRP Required
- **Superfund/NPL**
- **DOD - No LSRP required**
- **Direct Oversight- LSRP Required**





RCRA sites

- 192 RCRA corrective action
- 104 RCRA GPRA 2020 Sites
 - Construction Completed - 44 sites
 - Scheduled Construction Complete by 2020 - 42 sites
 - Deferred to Superfund - 4 sites
 - DEP Enforcement - 1 site





RCRA GPRA 2020

- 1984 HSWA Amendments to RCRA includes Corrective Action.
 - Requires corrective action of the “Facility”
 - All contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste, or for managing hazardous secondary materials prior to reclamation. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them.





2020 Construction Completion Goal

Construction completion is a site-wide measure that documents the completion of physical construction of all cleanup actions, including actions to address all immediate threats and to bring all long-term threats under control.

EPA established a goal based on numbers of sites
Progress reported to HQ & Congress





RCRA GRPA 2020 sites Timeframes

- EPA Lead – under RCRA Orders and Permits
 - Follows EPA approvals & timeframes
- DEP lead site
 - Follow Tech Rule timeframes
 - Time extensions, as justified to complete remediation





EPA/DEP RCRA Coordination

- DEP & EPA project managers – routine coordination
- DEP & EPA Managers meet quarterly to discuss issues & schedules.





September 30th, 2020 Goal

- DEP project managers strive to meet both DEP and EPA Goals
 - Provide justification for schedules that need to be altered because of site specific reasons will not meet the 2020 goal
- Public Notice required for construction complete.





RCRA Corrective Action Resources

NJDEP resources

<http://www.state.nj.us/dep/srp/oversight>

EPA RCRA corrective action resources -

<https://www.epa.gov/enforcement/rcra-corrective-action-cleanup-enforcement>

EPAs 2020 list

<https://www.epa.gov/sites/production/files/2016-04/documents/2020scc.pdf>

