MANAGING RCRA CORRECTIVE ACTION

2020 CONSTRUCTION COMPLETE GOAL

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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
• 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.)
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
DEP & EPA project managers – routine coordination

DEP & EPA Managers meet quarterly to discuss issues & schedules.
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