

Background on the Corrective Action Management Unit Rule and Amendments (CAMU)

Original CAMU Regulations

The original CAMU regulations were promulgated on February 16, 1993.

Settlement reached on Pending litigation

In February 2000, the Environmental Protection Agency (EPA), the Environmental Defense Fund, the Natural Resources Defense Council and the Environmental Technology Council reached a settlement agreement on pending litigation over Corrective Action Management Unit (CAMU) regulations for remediation waste under the Resource Conservation and Recovery Act (RCRA). Corrective Action Management Units, or "CAMUs," are special units which facilitate treatment, storage, and disposal of hazardous wastes managed for implementing cleanup, and to remove the disincentives to cleanup that the application of RCRA to these wastes can sometimes impose. The settlement was filed in the U.S. Court of Appeals for the District of Columbia Circuit. Under the settlement, if EPA promulgates amendments to the CAMU rule described in the settlement and certain other conditions are met, the CAMU lawsuit will be dropped.

- February 11, 2000, EPA issued a Press Release, "[EPA Reaches Settlement on "CAMU" Rule](#) –2000 regarding the settlement.

Proposed Amendments to the CAMU Regulations

In August 2000, EPA proposed Amendments to the Corrective Action Management Unit Regulations: Proposed Rule. The Agency proposed amendments to the regulations governing CAMUs concerning: the types of wastes that may be managed in a CAMU, the design standards that apply to CAMUs, the treatment requirements for wastes placed in CAMUs, information submission requirements for CAMU applications, responses to releases from CAMUs, and public participation requirements for CAMU decisions. In addition, the proposed amendments would "grandfather" certain categories of CAMUs and create new requirements for CAMUs used only for treatment or storage (i.e., those in which wastes will not remain after closure). This proposed rule also requested comment on a potential change to the staging pile regulations. Finally, this rule proposed an approach to state authorization that would grant "interim authorization" for the proposed amendments to most states currently authorized for the CAMU rule and would expedite the authorization process for states authorized for corrective action but not the CAMU rule. The proposed amendments were intended to make clearer the Agency's general minimum expectations for CAMUs and to make the CAMU process more consistent and predictable, as well as more explicit for the public.

- August 22, 2000 – EPA proposed [Amendments to the Corrective Action Management Unit Rule](#). 65 FR 51080
- August 2000 – EPA issued an [Environmental Fact Sheet, "Amendments to the CAM Rule Proposed."](#) (EPA530-F-00-029)
- November 20, 2001 – EPA proposed the [Supplemental Proposal to the Corrective Action Management Unit Rule](#), 66 FR 58085, referred to as "the supplemental proposal."

Final Rule: Amendments to the Corrective Action Management Unit Rule

In January 2002, EPA promulgated amendments to the regulations governing CAMUs. EPA amended the 1993 CAMU rule in six ways.

- First, EPA established a specific definition, distinct from the definition of remediation waste, to govern the types of wastes that are eligible for placement in CAMUs.

- Second, the Agency established more detailed minimum design and operating standards for CAMUs in which waste will remain after closure, with opportunities for Regional Administrators to approve alternate design standards under certain circumstances.
- Third, the Agency established treatment requirements for wastes that are placed in CAMUs, including minimum treatment standards, with opportunities to adjust treatment requirements under certain circumstances.
- Fourth, EPA established more specific information requirements for CAMU applications and is explicitly requiring that the public be given notice and a reasonable opportunity for public comment before final CAMU determinations are made.
- Fifth, the Agency established new requirements for CAMUs that will be used only for treatment and storage.
- Sixth, the rulemaking "grandfathered" certain types of existing CA: ARuMUs and allows them to continue to operate under the 1993 rule.

The rulemaking amended the regulations for "staging piles" to expressly allow for mixing, blending, and other similar physical operations intended to prepare wastes for subsequent management or treatment. It also added a new provision allowing off-site placement of hazardous CAMU-eligible waste in hazardous waste landfills, if they are treated to meet CAMU treatment standards (somewhat modified). Finally, the rule granted interim authorization for these CAMU amendments to states that are authorized for the 1993 CAMU rule, and it expedited state authorization for the CAMU rule for states that are authorized for the RCRA corrective action program but not the 1993 CAMU rule.

- January 22, 2002 – EPA published the Final Rule, Amendments to the Corrective Action Management Unit Rule, 67 FR 2962