

RCRA FIRST TOOL 1: Model Corrective Action Framework Meeting Agenda

Introduction

The CAF Meeting Agenda is the most important tool in the Toolbox. This is the initial entry to the RCRA FIRST process and the measurable RFI objectives that come from this meeting will anchor all subsequent activity and define the successful completion of the RFI.

It is critical that both the State/EPA and the facility do their homework prior to the meeting. This tool starts with a list of documents that should be exchanged at least 30 days prior to the meeting. Communication among the parties prior to the meeting is encouraged to verify that everyone is working with the same, most up-to-date versions of each document.

The meeting preparation, meeting, and development of a final CAF is expected to occur in 180 days or less.

Supporting Documents

Recommended Documents from Facility:

- Background information (items usually included in the Current Conditions Report)
- Stakeholder analysis with clear roles and responsibilities (e.g., facility, technical support, public facilitator, other)
- Closure information/post-closure information
- Relevant data from other programs

Recommended Documents from Lead Agency:

- Stakeholder analysis with clear roles and responsibilities (e.g., lead agency, support agency, technical support, public, facilitator, other)
- RCRA Facility Assessment
- Environmental indicator assessment
- Solid Waste Management Unit (SWMU) calling letter
- Permit/order
- Closure information/post-closure information
- Finalized summary of the CAF meeting and schedule of deliverables

Corrective Action Framework (CAF) Meeting Agenda

Time & Date
Location

Participants

- Lead Agency Project Manager*
- Lead Agency Supervisor*
- Lead Agency Technical Support (hydrogeologist, risk assessor, etc.)
- Lead Agency Legal
- Facility Project Manager*
- Facility Supervisor*
- Facility Technical Support (hydrogeologist, risk assessor, etc.)
- Facility Legal
- Support Agency

* *Suggested minimum participants*

Identification of Roles and Responsibilities

- *Lead Agency* – Provides legal and technical oversight of investigation to ensure facility is adequately characterized and approves workplans/reports.
- *Support Agency* – Provides technical guidance, represents support agency interests, and supports Lead Agency in formulating goals and expectations to obtain final concurrence.
- *Facility* – Collects and analyzes data, recommends path forward through process.

Topics for Discussion

- I. Introductions
- II. Reaffirm goals and objectives for CAF meeting and CAF process
- III. Discuss any permits or orders at the facility and remind all participants that the CAF process is not legally binding or intended to alter any legal requirements at the site unless the permit (or order, for interim status facilities) expressly incorporates the CAF
 - a. Discuss the dispute resolution process
- IV. Discuss Project Communication Plan
- V. Identify Roles and Responsibilities, including the elevation point of contact
- VI. Site Tour
 - a. Overview of facility/surrounding properties/environmental characteristics
 - b. Areas of Concern (AOCs)/SWMUs
 - c. Previous releases
 - d. RCRA regulated history
 - e. Other permitted activities (e.g., NPDES, Stormwater, Air)

- f. Receptors
 - g. Access or physical constraints
 - h. Other potential areas of investigation based on site history
 - i. Other
- VII.** Site Conceptual Model
- a. History
 - b. Current operations (e.g., facility and neighboring properties)
 - c. Current and reasonably-expected future site use
 - d. AOCs and SWMU description
 - e. Human health and ecological receptors
 - f. Exposure pathways
 - g. Constituents of concern/constituents of potential concern
 - h. Extent of known impacts
 - i. Discussion of unknowns and uncertainty with respect to current conditions
- VIII.** Goals and Expectations
- a. Land use/reasonably-expected further use in relation to characterization and remediation
 - b. Existing background conditions and consideration in RFI process
 - c. Use of historical data
 - d. Use of presumptive remedies
 - e. Expected groundwater use/process for addressing groundwater contamination including state, federal, and local requirements
 - f. Coordination with other programs
 - g. Potential facility process/land use/owner changes
 - h. Toxicity value/criteria changes
 - i. Expected risk range issues (target cancer risk and non-cancer hazard index)
 - j. Expected process for addressing remediation
 - i. Unknown sources
 - ii. Source removal vs. source control (containment)
 - iii. Use of risk based or pathway elimination approach
 - iv. Potential for determination of technical impracticability (TI)
 - v. Identification of areas with corrective action obligation
 - vi. Use of institutional controls and engineering controls
 - k. Other issues
- IX.** Discussion of interim measures
- a. Immediate interim measures
 - b. Future potential interim measures
- X.** Discussion of Items that may be included in the RFI workplan
- a. Elements of framework (e.g., Corrective Action Objectives)
 - b. Site conceptual model
 - c. Screening levels
 - d. Adaptive approach
 - e. Quality Assurance Project Plan (QAPP)

- i. Data quality objectives
 - ii. Standard operating procedures
 - f. Modeling
 - g. Use of historical data
 - h. Background conditions
 - i. Health and safety plan
 - j. Community involvement and environmental justice
 - k. Sampling approach/design
 - l. Sample analysis
 - m. Elements of RFI report
 - n. Workplan implementation schedule
- XI.** Other Potential Issues
 - a. Schedule of deliverables (e.g., RFI workplan)
 - b. Format for data/information exchange/submissions
 - c. Interim submission
 - d. Elements of RFI
 - e. Risk assessment
- XII.** Summary of Framework Meeting (brief written document by the end of the meeting)

Expected Session Outcomes

Expected outcomes correspond with Roman numerals in topic for discussion outline.

- I-V.** Common understanding of the roles and responsibilities of the regulatory authority (EPA and/or state) and facility as well as understanding the CAF process/meeting objectives
- VI.** Common understanding of the physical setting and constraints
- VII.** Common understanding of current conditions and site conceptual model (including data gaps)
- VIII.** Discussion and identification of goals and expectations for the regulatory authority (EPA and/or state) and facility including identifying methods to address any differences
- IX.** Common understanding of planned interim measures and/or a process to address interim measures that may be needed
- X-XI.** Common understanding of RFI workplan tasks with the goal of creating an approvable document with no revisions
- XII.** Finalized summary of the CAF meeting and schedule of deliverables (e.g., workplan)