



Hazardous Waste Forum Clean Closure Guidance Development (As of April 4, 2011)

Subgroup Volunteers (so far)

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Current Status

Research regarding existing state and federal clean-closure guidance/information that can be used in development of this guidance is underway. Initial drafting of this guidance to incorporate and/or modify existing guidance/information and develop new guidance in areas not already covered in existing documents is pending. No additional suggestions or additions to areas specified in this outline have been received.

Introduction

History

Regulations at 40 CFR 264/265 and corresponding state regulations.

EPA's Memo of March 16, 1998 regarding risk based clean closure.

Purpose and application

State guidance development would be intended to provide state-specific clarification of the elements of the applicable regulations, EPA's memo and to define what is "true" clean closure, "risk-based" clean-closure and situations where clean-closure is not applicable (i.e., post-closure care is required). Q: Do we want this guidance to also apply to resource recovery facilities?

Issues

Background levels of facility specific constituents of concern in soil and related closure implications

Naturally-occurring background levels, particularly metals.

Anthropogenic background levels, particularly PAHs.

Regional

Tidball (metals in agricultural soils and other studies (use and/or usefulness))

Local

Potential use of local information (e.g., USACE Study of Blue Valley Industrial Corridor in KC)

Facility-/Site-Specific

Preconstruction sampling and/or other site specific studies

Closure sampling and analysis requirements (Data Quality Objectives, Quality Assurance/Quality Control, applicable guidance references)

Predication on approved/permitted waste codes (not what was/is actually managed at the facility (discussion of pitfalls)).

Environmental media sampling (soil, surface water, groundwater)

Sampling of foundation materials (e.g., concrete). This element can be particularly problematic if chemicals are present above method detection limits. There is some available guidance on sample collection but very little out there with respect to what to compare results to

Collection and use of wipe samples

Collection and use of rinsate samples

This issue may cross many boundaries and set precedent for other activities (e.g., resource recovery unit closures, corrective action, building decontamination and reuse projects, etc.).

Hazardous Waste Handling Equipment

Decontamination

Collection and use of wipe samples

Collection and use of rinsate samples

Equipment Reuse

For an identical purpose.

For a different purpose.

Equipment scrapping/recycling

Decontamination

Certificate of Destruction

Non-Clean Closure Issues

Groundwater Impacts

How groundwater impacts generally factor into closure/post-closure decisions (if groundwater is impacted due to releases from the regulated unit, post-closure required if exceed risk-based levels (includes hazardous waste storage areas that have to close dirty as a landfill)

Closure/post-closure Deferral to Corrective Action

Why might this happen, when and how? What happens post deferral?

Institutional Controls

Deed notices, survey plats, MOECA/environmental covenants. When needed. Regulatory basis. Application to closure activities.

Next Actions

Continue research on existing state and federal clean-closure guidance/information and prepare draft of Clean Closure Guidance document for initial subgroup review and markup. Revise guidance based on subgroup feedback and, if revised version is agreeable to the HWP/subgroup, distribute draft final version for broad stakeholder input making any additional changes prior to finalization.