An Overview Of Risk-Based Corrective Action (RBCA) For Petroleum Release Sites. John B. Gustafson and Curtis C. Stanley, Shell Development Company, Paul C. Johnson, Arizona State University, Dennis D. Rounds, South Dakota Petroleum Release Compensation Fund. Presently, most states require cleanup of soil and groundwater based on generic ARAR’s. Usually, little thought is given to site-specific factors which should be key in determining the appropriate level of cleanup. The use of generic ARAR’s also does little to help with effective site categorization and management. This issue is exemplified by the problems associated with many state TRUST funds and CERCLA (i.e., little effective prioritization, rapid fund depletion). Large amounts of money are being spent to cleanup sites which may pose little risk to human health or the environment. This is occurring because many agencies have nothing to base cleanups on other than ARAR’s which do not take beneficial use into account. For those states which are developing risk-based procedures, there appears to be little consistency of approach, with many of the requirements being overly conservative and difficult to implement. In response to needs expressed by regulatory agencies and industry, the American Society for Testing of Materials (ASTM) undertook the challenge to develop a standardized approach to risk-based corrective action (RBCA) for petroleum release sites. A diverse and balanced task group was established. This group was comprised of representatives from the USEPA, state regulatory agencies, state cleanup funds, environmental consulting firms, and petroleum, insurance, and banking industries. Recently, ASTM ES 38-94, ”Guide for Risk-Based Corrective Action at Petroleum Release Sites” was approved as an ASTM Emergency Standard by the ASTM Committee on Standards. Since its formal approval (and even during the draft phase), this document has received considerable attention.

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