

7.1.6 Corrective Action

Corrective Action conditions should address any past contamination from the operation of the Subpart X Unit(s). Ground water monitoring of Subpart X areas should be covered under the ground water (40 CFR Part 264 Subpart F) provisions that are applicable to the unit(s). Remember to include all potential constituents from the waste, any casing materials, and degradation and treatment constituents. This is important since corrective action hazardous constituents may not include all the types of munition by-products or components. Maintenance problems can also be addressed by corrective action if there is a potential for releases of hazardous constituents.

Permit conditions should include compliance with Corrective Action at the Facility (General RCRA Section 3004(u)) and Corrective Action Beyond the Facility Boundary (RCRA Section 3004(v)). All Solid Waste Management Units (SWMUs) should be addressed on all contiguous property owned and/or operated by the Permittee(s). The administrative record should identify all SWMUs in the RCRA

Facility Assessment. The record should identify what type of corrective action is determined necessary for each unit, including no corrective action required at this time. The permit should address only those units requiring corrective action at the time the permit is issued. Conditions should include sections for “Newly Identified SWMUs or Releases”, “Corrective Action for New SWMUs or Releases” and “Dispute Resolution” for any corrective action activities.

Corrective Action and Subpart X requirements may also need to address conditions concerning future land use provisions. This is necessary to provide for risk assessment recommendation implementation, thus, locking in the land use for the term of the permit. Land use changes can be addressed through permit modifications. Institutional controls may also need to be addressed in the permit conditions.