

Remediation Waste Management:

Corrective Action
Management Units
[CAMU] &
Temporary Units [TU]

What are CAMUs and TUs?

- Flexible ways to manage wastes, water, soils, sediments, and debris at a remediation site
- Waste management units used in certain situations after a facility application and agency review and approval
- A 1993 rule adopted by CT
- A 2002 final federal rule not yet adopted by CT
- All of the above

Definitions

- TU = Temporary unit
- tanks or container storage areas used to treat or store hazardous remediation wastes during remedial activities [40 CFR 264.553]
- “temporary” = used for no more than two years [up to one year + one possible one-year extension]

Definitions, continued

- CAMU = Corrective action management unit
- Special unit under RCRA for treating, storing, or disposing of hazardous remediation wastes managed during site cleanup
- 2002 final rule created new term: “CAMU-eligible waste” to make wastes eligible to be managed in a CAMU a sub-category of “remediation wastes”

CAMU [1993] CT adopted

- CAMUs are land-based
- CAMUs used for on-site treatment, storage, or disposal of hazardous wastes managed for implementing cleanup. Process (“as-generated”) wastes not allowed and DEP can use “discretionary kickout” to exclude other wastes.
- Consolidation or placement of cleanup wastes into a CAMU is not considered land disposal and does not trigger Land Disposal Restrictions [LDRs] or create a unit subject to Minimum Technology Requirements [MTRs].
- CAMUs can be temporary or permanent [i.e., can close after removing waste or become a disposal unit]

Final 2002 Amendments to CAMU Rule

- Defines “CAMU-eligible wastes” as distinct from “remediation waste” by specifying ineligible wastes
- Establishes design and operating standards in more detail for CAMUs in which waste will remain after closure
- Establishes treatment requirements for wastes placed in CAMUs, including minimum treatment standards
- Requires more specific info requirements for CAMU applications and public notice and comment opportunity
- Establishes new requirements for CAMUs used only for treatment and storage
- Allows (“grandfathers”) certain types of existing CAMUS and allows them to continue to operate under the 1993 rule.

Status of CAMU Rules

- February 16, 1993 EPA rule
- Groups sued EPA
- HWIR-Media [1996] proposed withdrawal of CAMU rules
- Final HWIR-Media [1998] kept CAMU
- February 11, 2001 lawsuit settled
- January 22, 2002 amendments to CAMU rule finalized

Relation to HWIR-Media

- ◆ HWIR-Media Proposed Rule (1996) proposed withdrawal of CAMU rule because broad reforms would replace need for CAMU
- ◆ Changed definitions of remediation waste and remediation waste site
- ◆ Expanded applicability to non-RCRA Corrective Action sites
- ◆ HWIR-Media Final Rule (1998) creates “staging piles” as part of subpart S

2002 Amendments to CAMU rule

- January 22, 2002—too new to be incorporated in last CT regs update
- Final rule reflected February 11, 2001 court settlement regarding CAMU
- Grants interim authorization for the 2002 amendments to states that are authorized for the 1993 CAMU rule
- Under consideration for adoption in next CT regs update

Final CAMU 2002 rule *also*

- Amends “staging piles” to allow mixing, blending, and other similar operations to prepare wastes for management or treatment [CT did not adopt “staging piles” (HWIR-Media)]
- Adds a new provision allowing off-site placement of hazardous CAMU-eligible waste in hazardous waste landfills if treated to meet CAMU treatment standards
- Changes the title of 40 CFR 264, subpart S from “Corrective Action for Solid Waste Management Units” to “Special Provisions for Cleanup”