



**Department of the Environment**

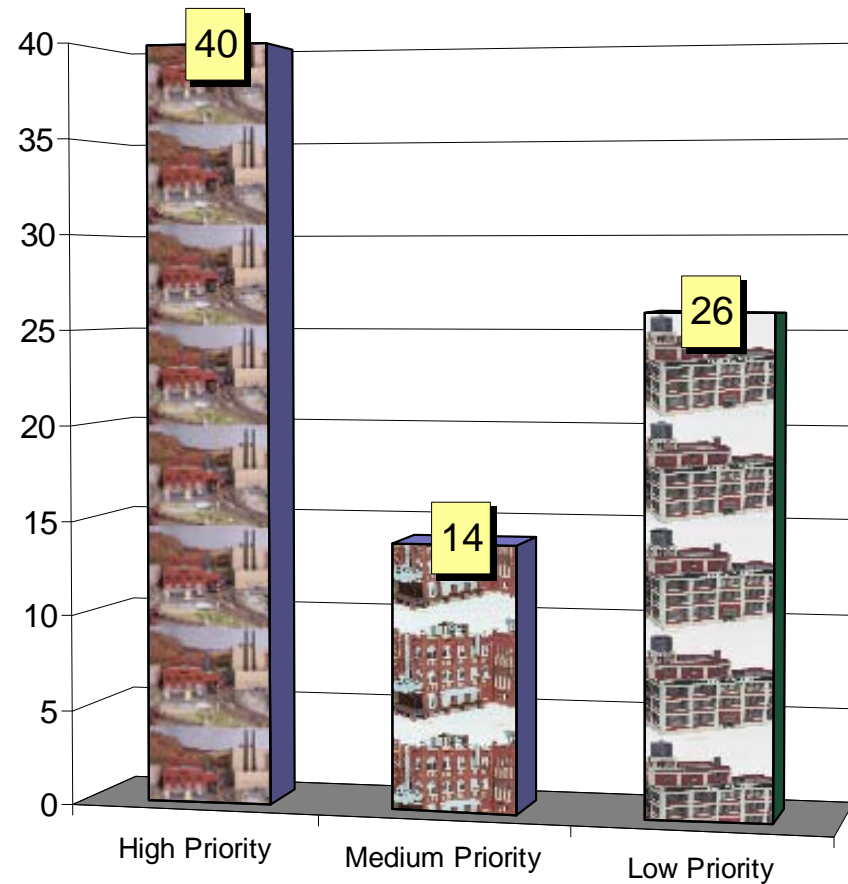
# **RCRA Corrective Action and State Voluntary Cleanup Programs**

**A Roadmap  
for Success**



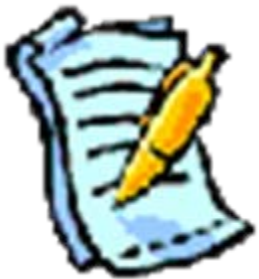
# Overview

- RCRA Corrective Action (CA) in Region 3
  - EPA Region 3 oversees CA
  - How Many Sites?



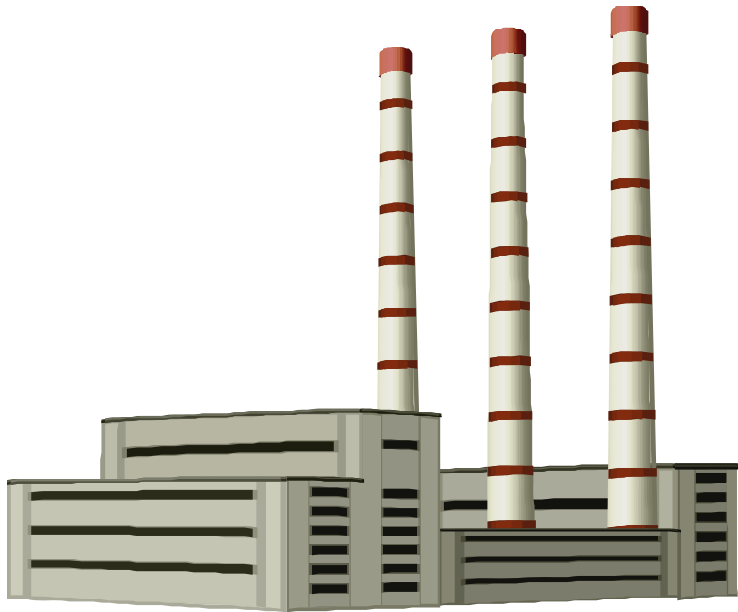
# Overview (Cont'd)

- Voluntary Cleanup Program
  - Purpose is to encourage redevelopment of sites
    - Provides liability protection and financial incentives
  - Program achievements since its creation in 1997
    - Received applications for 303 Properties
    - 137 Properties Received a No Further Requirement Determination (NFRD) and 26 Properties received a Certificate of Completion (COC)



# Overview (cont'd)

- Almost any property can enter the VCP
- Sites excluded from participation include:



- Sites with Controlled Hazardous Substance (CHS) permits
- National Priority List (NPL) sites
- Sites under active enforcement, unless the applicant is an inculpable person

# Overview (cont'd)

- Application must include:
  - Phase I ESA that meets ASTM 1527-05
  - Phase II or Phase II Work Plan
  - Application Fee
- Once accepted into the VCP, property will either:
  - Receive either a NFRD if no unacceptable risk at site, OR
  - Applicant prepares a Response Action Plan (RAP) to receive COC



# Keys to Success

- Planning
- Communication
- Coordination



## Planning

- Begin planning between project teams and stakeholders early and often
- Identify common issues
- Key people on for project teams and stakeholders
- Mechanisms for communication and goal setting





# Communication

- Decision makers, key stakeholders identified
- Project goals and milestones clearly understood
- Open communication and trust





## Coordination

- Clearly understood roles and responsibilities for all stakeholders
- Stakeholders participate in scheduling and milestone development
- Project teams effectively organized

# GM Baltimore Assembly Plant

- Industrial operations on 180-acre site for 68 years.
- Redevelopment as industrial park planned.
- Duke Realty, EPA and MDE developing site-wide strategy for redeveloping site while completing RCRA CA, VCP



# For Additional Information:

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