

BBJ Group Experience Overview RCRA Corrective Action

BBJ Group Practice Areas

Remediation and Site Restoration

Real Estate and Transaction Support

Regulatory Compliance Assistance

Risk and Liability Management

Ecosystem Services and Sustainability

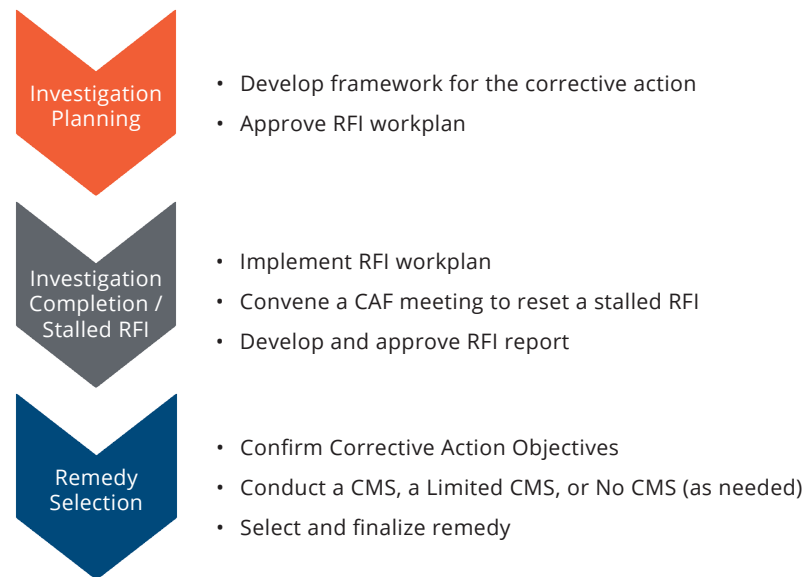
A Smarter Approach to Corrective Action

Approaches to the RCRA corrective action process sometimes adopt a “Penny Wise, Pound Foolish” strategy, minimizing efforts associated with the investigation planning and RFI completion phases and broadly focusing on traditional CMS steps.



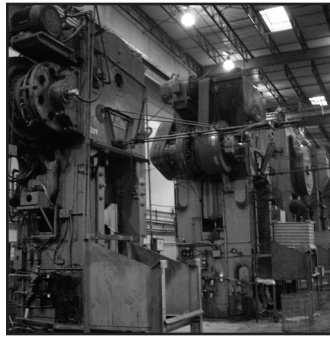
BBJ is a leader in current advances in the Process, EPA's new RCRA FIRST program. This approach avoids feedback loops, shortens the Process and reduces costs. One of our projects was selected as a pilot program for RCRA FIRST¹, which is now becoming EPA and enforcement authority states standard practice. We also bring over 30 years' experience and understanding of the evolving Process. RCRA FIRST principles and other efficiencies are integral to our approach, from the earliest phases. BBJ's approach to RCRA corrective action also utilizes our own expertise in environmental forensics to develop Conceptual Site Models: electronic, interactive files with relevant, necessary information. They help stakeholders stay focused. This means less time and money for unnecessary steps when the focus should be closure.

RCRA FIRST Phases



1 - Formerly RCRA Lean

RCRA Corrective Action Services



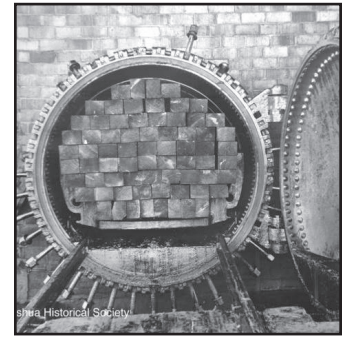
Indiana Heavy Bearings Plant

The complex was impacted with RCRA F001 and F003 listed hazardous wastes and metals. A Superfund site plume was comingled with plant groundwater. The client reached a voluntary corrective action agreement vs. EPA Region 5 Order. Work combined Site Investigation and Interim Measures before completing remedy pilot studies the stakeholders could agree on. Corrective Measures used site-specific ACLs. The property used Environmental Covenants, AULs, and ECs and was donated to the City.



Former Electronics Facility

This 123-acre Midwest plant, underlain by karst, was one of the earlier RCRA FIRST (formerly RCRA Lean) pilot studies. BBJ, EPA, the State, other agencies, and stakeholders finalized the CAF in November 2014. Eliminating or streamlining traditional RCRA Phases or elements has allowed for the clean-closure of most SWMUs and AOCs. Combined with other supplemental data and environmental forensics, a clear and robust CSM have allowed the group to largely focus on completion of work regarding one SWMU.



Midwest Wood Treatment Facility

This EPA Region 5, Interim Status former utility pole, and cross arms creosote wood preserving facility was located in the upper Midwest. A focused SWMU and AOC Site Characterization Work Plan was developed and implemented. Subsequent framework investigation phases resulted in clean closure. This facility and another wood preserving site the client owned in EPA Region 4, benefited from unique hydrogeologic conditions that allowed a carefully written SAP to close the sites.

Other Recent Experience

OTHER RCRA EXPERIENCE (EPA REGION)	Investigation Phase / RFI	Current Conditions Report	Financial Assurance	Conceptual Site Model	Remedy Selection	Part B Permit or Interim Status	Decrees or Orders	F List Hazardous Waste	K List Hazardous Waste	Clean-Closed	Closure in Place	Covenants, AULs, ECs	RCRA FIRST	Enforcement Authority State	EPA Lead
Small Arms Ammunition Manufacturing (5)	✓	✓		✓						✓				✓	
Large Appliance Manufacturer (7)	✓	✓		✓				✓				✓	✓		✓
Atlantic Steel (4)	✓	✓	✓	✓	✓	✓		✓	✓					✓	
Lead Mining and Smelting (7)	✓		✓	✓		✓			✓					✓	
Creosote, Penta Wood Preserving Sites (4, 5)	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓			✓	✓
Electronics Parts Manufacturing Plant (7)	✓	✓	✓	✓	✓			✓		✓		✓	✓	✓	
Copper Tube Manufacturing Plant (4)	✓	✓	✓		✓		✓	✓	✓		✓	✓			✓
Foundry (5)			✓												
Hazardous Waste TSD (5)	✓	✓	✓	✓	✓	✓	✓	✓			✓	✓			✓
Specialty Chemical Company (4)	✓		✓	✓	✓		✓	✓			✓	✓		✓	
Chemical Plant Manufacturing (2)	✓		✓			✓	✓	✓						✓	