



Standard Guide for Developing and Implementing Short-Term Measures or Early Actions for Site Remediation¹

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1. Scope

1.1 The purpose of this guide is to provide guidance for assisting in the development, selection, design, and implementation of partial, short-term, or early action remedies undertaken at sites of waste contamination for the purpose of managing, controlling, or reducing risk posed by environmental site contamination. Early action remedies and strategies are applicable to the management of other regulatory processes (for example, state UST programs are equally applicable) in addition to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)/NCP process. This guide identifies and describes a standard process, technical requirements, information needs, benefits, and strategy for early actions.

1.2 This guide is applicable to both nonhazardous and hazardous sites of contamination as defined by CERCLA as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) and the Resource Conservation and Recovery Act (RCRA) as amended by the Hazardous and Solid Waste Amendments (HSWA) of 1986.

1.3 To the extent that this guide may be used for hazardous materials actions operations, it does not address the applicability of regulatory limitations and local requirements.

1.4 *This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use.*

2. Referenced Documents

2.1 ASTM Standards:

E 1528 Practice for Environmental Site Assessment: Transaction Screen Process²

2.2 Code of Federal Regulations:³

Corrective Action or Solid Waste Management Units at

Hazardous Waste Management Facilities, Proposed Rule, 27 July 1990, 40 CFR Parts 264, 265, 270, and 271 (55 FR 30797)

Corrective Action Management Units and Temporary Units; Corrective Action Provisions; Final Rule, 16 February 1993, 58 FR 8658

National Oil and Hazardous Substances Pollution Contingency Plan, Final Rule, 8 March 1990, 40 CFR Part 300

2.3 EPA Documents³

CERCLA, Compliance with Other Laws Manual, Part I (Interim Final), August 1988, EPA/9234.1-01

CERCLA, Compliance with Other Laws Manual, Part II: Clean Air Act and Other Environmental Statutes and State Requirements, August 1989, EPA/9234.1-02

Guidance for Performing Preliminary Assessments under CERCLA, September 1991, EPA/9345.0-01A

Guidance for Performing Site Inspections under CERCLA, September 1992, EPA/9345.1-05

Data Quality Objectives for Remedial Response Activities: Development Process, EPA/540/G-87/003

Guidance for Conducting Remedial Investigations and Feasibility Studies (RI/FS) under CERCLA, October 1988, EPA/9355.3-01

RCRA Corrective Action Interim Measures Guidance, Interim Final, June 1988, EPA/9902.4

3. Terminology

3.1 Definitions:

3.1.1 *applicable or relevant and appropriate requirements (ARAR)*—those requirements, cleanup standards, standards of control, and other substantive environmental protection requirements, criteria, or limitations promulgated under federal or state law that show either a direct correspondence or address problems or situations sufficiently similar at a site to show that they are well suited for application.

3.1.2 *conceptual site model, n*—a mental or physical representation of the physical system and the iterative characterization of the physical and chemical processes and conditions that affect the transport of contaminants from sources through environmental media to receptors or potential receptors.

3.1.3 *contaminant, n*—any substance potentially hazardous to human health or the environment and present in the

¹ This guide is under the jurisdiction of ASTM Committee D-34 on Waste Management and is the direct responsibility of Subcommittee D34.05 on Site Remediation.

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² *Annual Book of ASTM Standards*, Vol 11.04.

³ Available from Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402.