

THE TAO OF RAO - REMEDIATION GOALS FOR FORMER CAMP S, A CASE STUDY IN WHAT WAS AND WHAT COULD HAVE BEEN

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We present a case study in comparing remediation goals being developed in the feasibility study for Former Camp S. to remediation goals the authors would have developed using a new approach now included in U.S. Army Corps of Engineers Engineer Manual 200-1-15, “Environmental Quality Technical Guidance For Military Munitions Response Actions”. The Former Camp S project team developed remediation goals for the feasibility study’s remedial action objective following the RMM trial-period methodology, concluding with a remediation goal that does not address exposure pathways individually, but rather applies a blanket remediation goal to all exposure pathways regardless of user activity or the probability of MEC presence. We compare that process and that remediation goal to the remediation goal the authors would have developed based on the NCP, which focuses on remediation goals to prevent or limit types of exposures. The approach guides the project team through a series of questions that starts by getting consensus on whether or not “prevention” of exposures will require MEC treatment under the site-specific conditions. The next step is to identify the primary risk concern for each of the individual exposure pathways addressed in the remedial action objective, which will either be risks stemming from interactions with MEC or risks stemming from encounters with MEC. Last, the process tackles the problem of identifying whether the goal needs to be to “limit” or to “prevent” the primary risk that has been identified. This method, applied to Former Camp S Former Artillery Range, identified seven exposure pathways, each of which was run through the process described above. The new approach generates remediation goals that can be used as metrics to monitor the ongoing protectiveness of a remedy.