Comprehensive Environmental Response, Compensation, and Liability Act
CERCLA

- Provides EPA authority to investigate and remediated sites contaminated with hazardous substances.
- Establishes and Implements the National Contingency Plan (NCP)
- §9602(a) Provides Authority to Designate Hazardous Substance and Reportable Quantities

NCP: An organization structure that allows for effective, coordinated, and efficient and response to releases of hazardous substances.

Discovery → Investigation → Assessment → Cleanup

National Priorities List: List of Nations Most Contaminated Site

- Requires additional oversite and cleanup to address Hazardous waste
- Based on a scoring system.

Rule Making

- Proposed Date
- Public Comment Close
- 140,000 responses
- Narrowed to 60,000 comments
- August 2023 Finalization Date

ARARs: Applicable or Relevant and Appropriate

- Non-CECRLA Regs that apply to cleanup
- CWA, Drinking Water Standards (State or Federal)

What is RCRA?

- 3 Base Programs:
  - Subtitle D: Non-hazardous solid waste
  - Subtitle C: Hazardous waste
  - Subtitle I: Underground Storage Tanks
- RCRA gives EPA and authorized States the authority to control hazardous waste from the "cradle-to-grave"
- This includes from generation, transportation, treatment, storage and disposal of hazardous waste, and cleanup.
- Enforcement/Compliance and Corrective Action
- Missouri authorization for the RCRA baseline program, hazardous waste permitting and corrective action
- For more information: https://www.epa.gov/rcra/resource-conservation-and-recovery-act-rcra-overview

EPA Proposed Actions for PFAS in RCRA

- Initiation of Two Rulemaking Efforts Under RCRA
  - Addition of four PFAS chemicals (PFOA, PFOS, PFBS and GenX) as RCRA Hazardous Constituents under Appendix VIII
  - Regulatory clarification of RCRA authority to address PFAS
- Other actions that may affect RCRA
  - Adding PFAS chemicals to Contaminated Site Cleanup Tables
  - Addressing PFAS in National Pollutant Discharge Elimination System (NPDES) Permitting
  - Expanding PFAS monitoring in drinking water (UCMR 5)
  - Establishing a National Primary Drinking Water Standard for PFOA/PFOS
- For more information: https://www.epa.gov/pfas/epa-actions-address-pfas