

US EPA ARCHIVE DOCUMENT

## RCRA Showcase Pilot - Region 6

### Lucent Technologies, Oklahoma City, Oklahoma

The Lucent Technologies facility in Oklahoma City is an EPA Region 6 - Oklahoma Department of Environmental Quality (ODEQ) Corrective Action Strategy (CAS) pilot project. Region 6 has initiated an aggressive program to assist our states in streamlining the RCRA Corrective Action Process. Over the course of the last three years Region 6 with significant input from stakeholders has developed a risk-based guide that can significantly accelerate corrective action at Resource Conservation and Recovery Act (RCRA) facilities. The Region 6 CAS is a flexible guide that can be used to enhance state specific corrective action rules and regulations by highlighting and promoting the use of flexibility found in our national corrective action policy. Under this new approach entire facilities will be evaluated as a whole, investigations and cleanups prioritized on a “worst first” basis to better focus resources (time and money), and corrective action driven by risk based decision making which accurately and realistically reflect current and future land use scenarios and beneficial use of resources.

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**Facility Name** - Lucent Technologies  
Oklahoma City, Oklahoma

The facility’s current and historical operations has been the manufacture of communications and switching equipment. Began operations in 1960 as the Western Electric Company. The RFA was completed in 1989. The RFI began in 1991 and was approved in 1995. The CAS will likely be conducted under a Letter Agreement between the ODEQ and Lucent. Lucent is a GPRA baseline facility.

**Pilot Project Participants** - Lucent facility representatives, Oklahoma Department of Environmental Quality (ODEQ) staff and EPA Region 6 CAS team members.

**Oversight of the Lucent CAS Pilot** - Oversight of this pilot will be carried out by ODEQ. The Region 6 CAS Team members will participate in meetings and provide technical assistance.

**Key Contacts** -

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**Innovations of the CAS Pilot Program** -

- Conceptual site model will be developed using existing data from the existing RFI, and will be used to develop data quality objectives to drive additional data collection, develop performance standards to be achieved, and ensure realistic evaluation of current and future site and resource use
- Prioritizes Corrective Action - utilizes screening tables to prioritize corrective action efforts based on risk, worst first approach, focuses time and money; flexibility for the owner/operator in achieving performance standards

- Risk-Based - ensures protection of human health and the environment
- Streamlines administrative procedures using a Letter Agreement mechanism rather than a permit renewal, incorporating informal and frequent face-to-face communication throughout the process, with team members empowered to make decisions. These innovations will increase trust and promote timeliness
- Facility wide approach which recognizes and promotes phased remediation and acknowledges cost as a function of remediation
- Remedial selection balanced between treatment, engineering controls and institutional controls

**Stakeholder Support for the CAS** - The Lucent Technologies facility is Region 6's most recent CAS pilot. The initial meeting with the State was held on April 17, 2001. The Scoping meeting is tentatively scheduled for fall 2001 where involvement of stakeholders will be discussed. During development of the CAS document, EPA Region 6 sought extensive stakeholder input from states, industry, environmental groups, EPA HQs, other EPA regions. This pilot project is being conducted cooperatively with the state of Oklahoma and the facility. The CAS promotes early and continued involvement of stakeholders and encourages states to implement their own established procedures as long as they provide public participation at key decision making stages such as, agreement on performance standards, remedy proposals, and closeout.

**Benefits of the CAS** - The CAS is a useful approach to corrective action for facilities that are willing to commit resources up front to manage risk at their sites. Since the CAS takes a site-wide approach to corrective action, this may result in more efficient remedy solutions. Provides a relatively easy administrative approach to conduct corrective action. Promotes a cooperative/results based working arrangement (face to face meetings, gained trust reduces review/oversight needs, allows for use of existing data meeting DQOs, etc.) Promotes early discussion of critical issues and expectations (conceptual site model, DQOs, screening criteria, performance standards, etc). Allows flexibility to achieve results (sampling programs, screening approaches, focus on what's important, recognizes that changes may be necessary throughout the process, etc.). Resource utilization can be better predicted (dollars, personnel).

**Proposed Project Milestones** - The Lucent Technologies facility is Region 6's most recent CAS pilot. The initial meeting with the State was held on April 17, 2001. The Scoping meeting is tentatively scheduled for fall 2001 where the project team will review the conceptual site model, discuss potential performance standards for the facility, and discuss development of the CAS work plan to define data gaps based on site specific DQOs.

**Measuring and reporting the Progress of the CAS Pilot** - EPA Region 6 CAS team members have developed a Virtual Office, which is an information-sharing extranet site, to be used by all CAS pilot project participants. Authorized users of the VO will be able to track and monitor the progress of the pilot project. Non pilot project participants will have access to pilot summary reports and schedules through an Region 6 public web page.

**Application of the CAS for other projects** - The CAS was developed as a tool for the states to use to

expedite corrective action. The concepts in the CAS can be applied for facilities that are just beginning corrective action, facilities that are not making progress with their investigations, or for facilities that need assistance in remedy proposals. The CAS emphasizes the use of existing data, and does not require additional reporting. For states that have corrective action regulations (generally provide cleanup numbers), the CAS offers an alternative process for completion of corrective action.