

SC Risk Based Corrective Action Principles and Low Threat Closures

RISK BASED CORRECTIVE ACTION PRINCIPLES

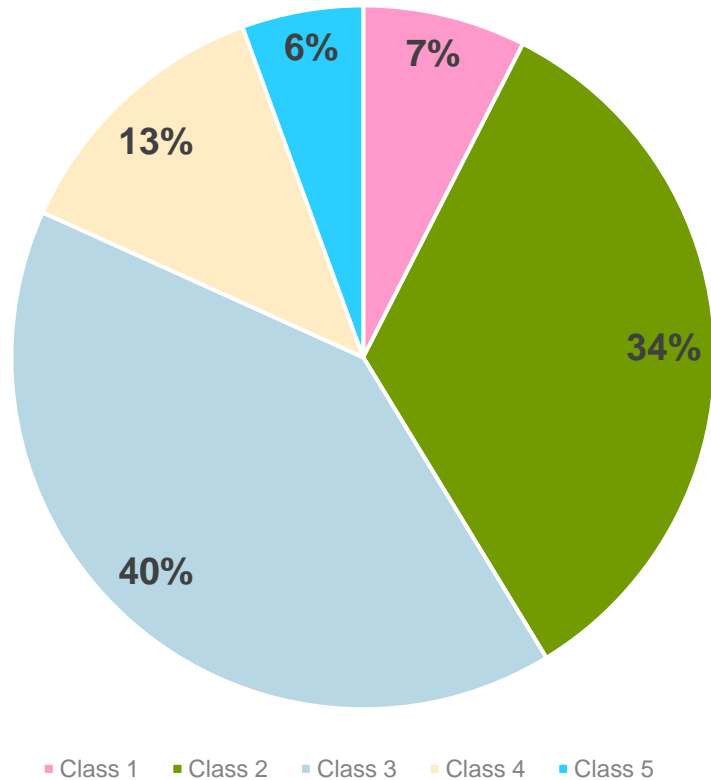
- **Risk-Based Corrective Action (RBCA)** is a generic term for **corrective action** strategies that categorize sites according to **risk** and move all sites toward completion using appropriate levels of **action** and oversight.

SOUTH CAROLINA'S RBCA PROCEDURES

- SC's RBCA procedures are laid out in State Underground Petroleum Environmental Response Bank (SUPERB) Site Rehabilitation and Fund Access Regulations, R.61-98
- SC has five classifications to prioritize UST releases and each classification has a list of conditions that must exist at the site for the release to be placed in a classification.

SC RBCA CLASSIFICATION

Number of releases in 2022 (2,208 releases)



1A*	Emergency situation
1B*	Fire or explosion hazard
1C*	Vapors or free product in structures/utilities
1D*	Chemicals detected in water
1E*	Free product on surface water
2AA	0 to 1 year threat to health
2AB	Water supply wells < 1 year downgradient
2BA	Free product > 1 foot
2BB	Water supply wells within 1,000 feet
3AA	Short term 1-2 year threat
3AB	Water supply wells 1 to 2 years downgradient
3AC	Sensitive habitats < 1 year downgradient
3BA	Free product > 0.01 foot
3BB	Chemicals detected non-potable
3BC	Hydrocarbons in soil < 3 feet below ground surface
3BD	Sensitive habitat < 500 feet downgradient
3BE	Sensitive hydrologic setting
3BF	Groundwater < 15 feet in sand or gravel
4AA	Long term > 2 year threat
4AB	Water supply wells 2 to 5 years downgradient
4AC	Non-potable water supply well < 1 year downgradient
4BA	Free product sheen in well
4BB	Non-potable water supply well < 1,000 feet downgradient
4BC	Groundwater < 15 feet in silt or clay
5A	No pending threat, additional data
5B	Assessment data not conclusive

WHY DO YOU NEED A LOW THREAT CLOSURE APPROACH?

- SC has over 2,000 releases
- Most of the releases are in the mid to lower SC RBCA Classification
- limited time and resources for the lower threat releases
- Goal to reduce the number of releases in SC by focusing on the lower threat releases.

METHODS USED TO INCREASE LOW THREAT CLOSURES

- Received grant monies from EPA.
- We had senior staff members go through the whole portfolio of releases in SC and triaged them to see which ones were close to closure.
- We used additional resources.

RESULTS OF THE METHODS USED ON LOW-RISK RELEASES.

- In the last four years the hourly positions have modeled and/or public noticed 230 releases.
- 48 out of the 53 release that were triaged have been issued a closure.
- 19 out of 41 releases were closed using EPA grant monies.

ACTIVE RELEASES BY CLASSIFICATIONS

2,289 active releases 9/16/19

- 183 Class 1 (8%)
- 786 Class 2 (35%)
- 896 Class 3 (39%)
- 302 Class 4 (13%)
- 122 Class 5 (5%)

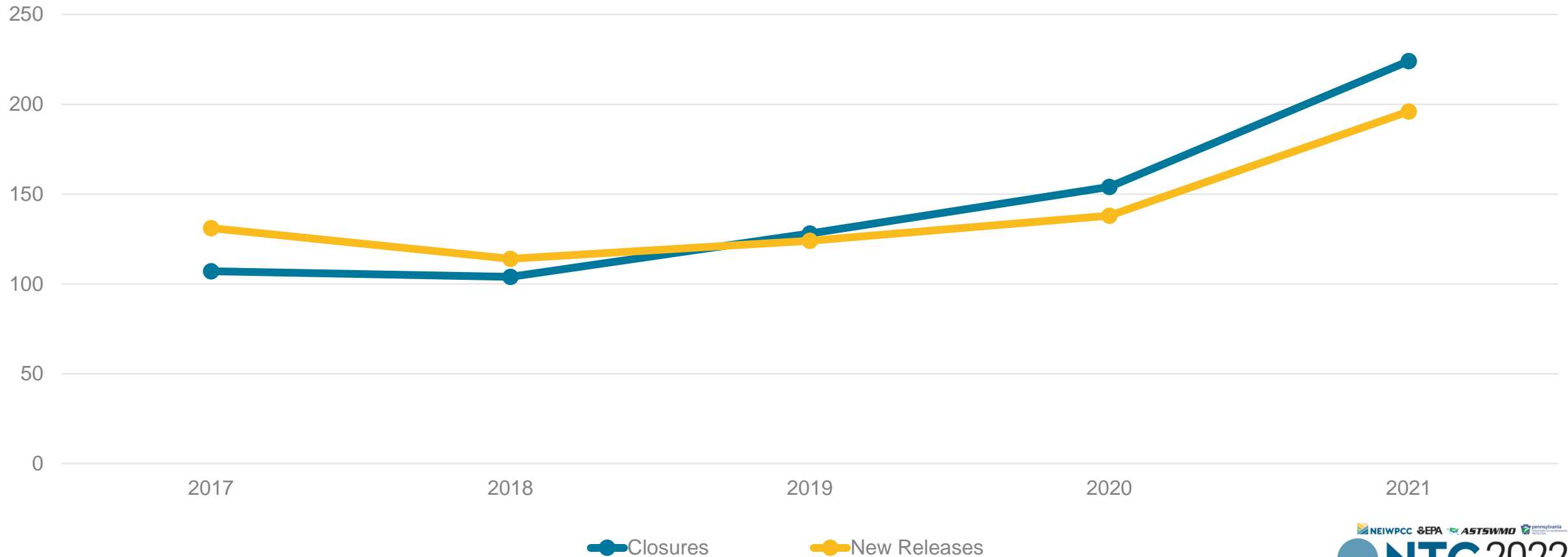
2,208 active releases 8/31/22

- 165 Class 1 (7%)
- 740 Class 2 (34%)
- 905 Class 3 (41%)
- 283 Class 4 (13%)
- 115 Class 5 (5%)

CHALLENGES WITH LOW-RISK CLOSURES

- Time, funding, and resources.
- Current supply issues and inflation.
- Sites that have recurring free product.
- Increase in number of new releases being confirmed each year.

CLOSURES VS NEW REPORTED RELEASES



WHAT SC IS DOING NOW TO ADDRESS LOW RISK CLOSURES

- Federal grant monies
- Hourly staff
- Triaging the list of all SC releases
- Class 5 study

CONDITIONAL NO FURTHER ACTION (CNFA) VERIFICATION STUDY

- The CNFA verification study ensures that the current procedures used by SC to place sites in CNFA status are accurate and scientifically defensible.

CONTACT US

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