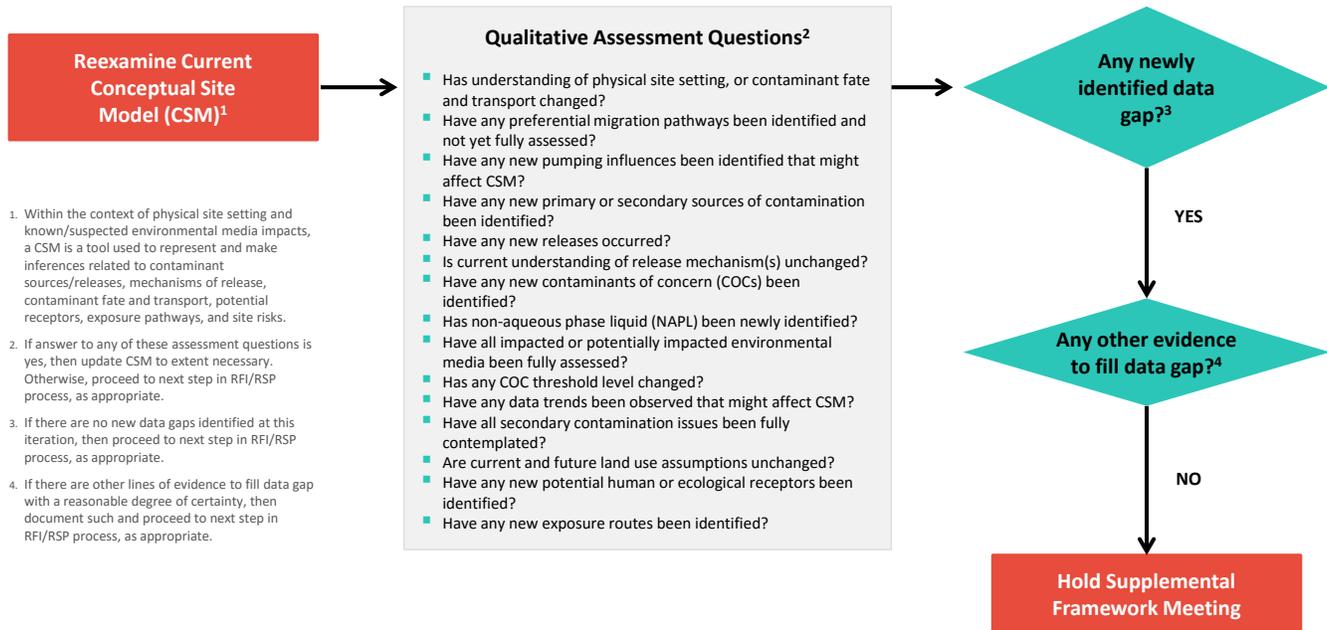


RCRA FIRST TOOL 5: Conceptual Site Model Iterative Evaluation/Update Tool

Figure A.5 Conceptual Site Model Iterative Evaluation/Update Tool



1. Within the context of physical site setting and known/suspected environmental media impacts, a CSM is a tool used to represent and make inferences related to contaminant sources/releases, mechanisms of release, contaminant fate and transport, potential receptors, exposure pathways, and site risks.
2. If answer to any of these assessment questions is yes, then update CSM to extent necessary. Otherwise, proceed to next step in RFI/RSP process, as appropriate.
3. If there are no new data gaps identified at this iteration, then proceed to next step in RFI/RSP process, as appropriate.
4. If there are other lines of evidence to fill data gap with a reasonable degree of certainty, then document such and proceed to next step in RFI/RSP process, as appropriate.

1. **Reexamine the current Conceptual Site Mode (CMS)⁹**
2. **Consider the following qualitative assessment questions.** If answer to any of these assessment questions is yes, then update CSM to extent necessary. Otherwise, proceed to next step in RFI/RSP process, as appropriate.
 - a. Has understanding of physical site setting, or contaminant fate and transport changed?
 - b. Have any preferential migration pathways been identified and not yet fully assessed?
 - c. Have any new pumping influences been identified that might affect CSM?
 - d. Have any new primary or secondary sources of contamination been identified?
 - e. Have any new releases occurred?
 - f. Is current understanding of release mechanism(s) unchanged?
 - g. Have any new contaminants of concern (COCs) been identified?
 - h. Has non-aqueous phase liquid (NAPL) been newly identified?
 - i. Have all impacted or potentially impacted environmental media been fully assessed?
 - j. Has any COC threshold level changed?
 - k. Have any data trends been observed that might affect CSM?
 - l. Have all secondary contamination issues been fully contemplated?
 - m. Are current and future land use assumptions unchanged?

⁹ Within the context of physical site setting and known/suspected environmental media impacts, a CSM is a tool used to represent and make inferences related to contaminant sources/releases, mechanisms of release, contaminant fate and transport, potential receptors, exposure pathways, and site risks.

- n. Have any new potential human or ecological receptors been identified?
 - o. Have any new exposure routes been identified?
3. **Any newly identified data gap?**
- a. If there are **no new data gaps** identified at this iteration, then proceed to next step in RFI/RSP process, as appropriate.
 - b. If there **is a new data gap**, assess whether there is other evidence to fill the gap.
 - c. If there are **other lines of evidence to fill the data gap** with a reasonable degree of certainty, then document such and proceed to next step in RFI/RSP process, as appropriate.
 - d. If there are **no other lines of evidence** to fill the data gap within a reasonable degree, hold a supplemental corrective action framework meeting.