



Standard Guide for Developing and Implementing Short-Term Measures or Early Actions for Site Remediation¹

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1. Scope

1.1 The purpose of this guide is to provide guidance for assisting in the development, selection, design, and implementation of partial, short-term, or early action remedies undertaken at sites of waste contamination for the purpose of managing, controlling, or reducing risk posed by environmental site contamination. Early action remedies and strategies are applicable to the management of other regulatory processes (for example, state UST programs are equally applicable) in addition to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)/NCP process. This guide identifies and describes a standard process, technical requirements, information needs, benefits, and strategy for early actions.

1.2 This guide is applicable to both nonhazardous and hazardous sites of contamination as defined by CERCLA as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) and the Resource Conservation and Recovery Act (RCRA) as amended by the Hazardous and Solid Waste Amendments (HSWA) of 1986.

1.3 To the extent that this guide may be used for hazardous materials actions operations, it does not address the applicability of regulatory limitations and local requirements.

1.4 *This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use.*

2. Referenced Documents

2.1 ASTM Standards:

E 1528 Practice for Environmental Site Assessment: Transaction Screen Process²

2.2 Code of Federal Regulations:³

Corrective Action or Solid Waste Management Units at

Hazardous Waste Management Facilities, Proposed Rule, 27 July 1990, 40 CFR Parts 264, 265, 270, and 271 (55 FR 30797)

Corrective Action Management Units and Temporary Units; Corrective Action Provisions; Final Rule, 16 February 1993, 58 FR 8658

National Oil and Hazardous Substances Pollution Contingency Plan, Final Rule, 8 March 1990, 40 CFR Part 300

2.3 EPA Documents³

CERCLA, Compliance with Other Laws Manual, Part I (Interim Final), August 1988, EPA/9234.1-01

CERCLA, Compliance with Other Laws Manual, Part II: Clean Air Act and Other Environmental Statutes and State Requirements, August 1989, EPA/9234.1-02

Guidance for Performing Preliminary Assessments under CERCLA, September 1991, EPA/9345.0-01A

Guidance for Performing Site Inspections under CERCLA, September 1992, EPA/9345.1-05

Data Quality Objectives for Remedial Response Activities: Development Process, EPA/540/G-87/003

Guidance for Conducting Remedial Investigations and Feasibility Studies (RI/FS) under CERCLA, October 1988, EPA/9355.3-01

RCRA Corrective Action Interim Measures Guidance, Interim Final, June 1988, EPA/9902.4

3. Terminology

3.1 Definitions:

3.1.1 *applicable or relevant and appropriate requirements (ARAR)*—those requirements, cleanup standards, standards of control, and other substantive environmental protection requirements, criteria, or limitations promulgated under federal or state law that show either a direct correspondence or address problems or situations sufficiently similar at a site to show that they are well suited for application.

3.1.2 *conceptual site model, n*—a mental or physical representation of the physical system and the iterative characterization of the physical and chemical processes and conditions that affect the transport of contaminants from sources through environmental media to receptors or potential receptors.

3.1.3 *contaminant, n*—any substance potentially hazardous to human health or the environment and present in the

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² *Annual Book of ASTM Standards*, Vol 11.04.

³ Available from Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402.

environment above background concentration.

3.1.4 *early action*, *n*—any remedial plan initiated in advance of a complete or final characterization of a contaminated site.

3.1.5 *final remedy*, *n*—site restoration.

3.1.6 *interim remedial measure*, *n*—a remedial action that implements a partial solution prior to the selection of a final complete remedy. Interim remedial measures may be early actions, but they are often not.

3.1.7 *migration*, *n*—the movement of contaminant(s) away from a source through permeable subsurface media (such as the movement of a groundwater plume of contamination) or the movement of contaminant(s) by a combination of surficial and subsurface processes.

3.1.8 *partial remedy*, *n*—an interim or incomplete solution intended to be consistent with the expected permanent remedy for treatment, control, elimination, or management of risk associated with the release of a contaminant to the environment.

3.1.9 *potential migration pathway*, *n*—the route that may be taken by contaminants in the environment as they move or are transported from the source(s), usually in a downgradient direction.

3.1.10 *preliminary assessment (PA)*, *n*—a review of existing information and an off-site reconnaissance, if appropriate, to determine whether a release may require additional investigation or action. A preliminary assessment may include an on-site reconnaissance, if appropriate. See ASTM Guidance for Transaction Screen Questionnaire (Practice E 1528).

3.1.11 *receptor*, *n*—humans or other species potentially at risk from exposure to contaminant(s) at the point(s) of exposure.

3.1.12 *release*, *n*—any spilling, leaking, pumping, emitting, emptying, discharging, injecting, escaping, leaching, dumping, and disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles) of any hazardous chemical, extremely hazardous substance, or CERCLA hazardous substance.

3.1.13 *removal*, *n*—the cleanup or removal of released hazardous substances from the environment; such actions as may be necessary to take in the event of the threat of release of hazardous substances into the environment; such actions as may be necessary to monitor, assess, and evaluate the release or threat of release of hazardous substances; the disposal of removed material; or the taking of such other actions as may be necessary to prevent, minimize, or mitigate damage to the public health or welfare or to the environment, which may otherwise result from a release or threat of release.

3.1.14 *short-term measure*, *n*—an early action designed to have an authorized duration of less than one year for the effective control or management of a contaminant released to the environment.

3.1.15 *size characterization*, *n*—the process by which information relating to the nature, extent, potential migration pathways, and receptors of environmental contaminants is gathered, interpreted, and documented. Site characterization efforts to provide a basis for the following: (1) the development of a conceptual site model (CSM), (2) the selection and design

of a site remediation plan, or (3) the measuring point against which the effectiveness of a remedy can be evaluated, or some combination thereof.

3.1.16 *site inspection (SI)*, *n*—an on-site investigation to determine whether a release or potential release exists and the nature of the associated threats. The purpose is to augment the data collected in the preliminary assessment and to generate, if necessary, sampling and other field data to determine whether further action or investigation is appropriate.

3.1.17 *site remediation*, *n*—those actions taken in the event of a release or threatened release of a hazardous substance in to the environment, to prevent or minimize the impact of the release, or to mitigate a substantial hazard to present or future environmental conditions. This early action may or may not lead to ultimate restoration of the site.

3.1.18 *source*, *n*—the location at which contamination has entered the natural environment.

3.2 Description of Terms Specific to This Standard:

3.2.1 *significantly above background*, *adj*—the mean concentration of a site contaminant can be shown (by statistical analysis of other methods) to be greater than nearby background samples from the same pathway.

4. Summary of Guide

4.1 The basic activities associated with implementing an early action are as follows: (1) construction of a CSM and estimation of risk(s); (2) identification of exposure control pathways amenable to engineered control; (3) development of interim or partial solutions, estimation of engineered risk, and identification and negotiation of required action levels; (4) selection of the desired solution(s); (5) attainment of legal authority for implementation of the planned solution(s); (6) design and execution of the selected solution(s); and (7) post-implementation monitoring of the conceptual site model.

4.2 Five common objectives for an early action are to achieve the following: (1) minimize the human or environmental risk exposure, or both; (2) minimize the time required to implement a final remedy; (3) protect resources (for example, financial, mineral, and ecological); (4) minimize the complexity of a final remedy; or (5) provide a solution-oriented project focus, or combination thereof.

4.3 There are three basic types of partial, short-term or early action remedies: (1) source control remedies, (2) pathway control remedies, and (3) receptor control remedies. It is more common for early actions to be of the source or receptor control type since pathway controls usually require a sophisticated understanding of the dynamics of a conceptual site model.

4.4 The development of a final remedy is often an iterative process that evolves frequently with the compilation of new data in the CSM. The development and implementation of early actions that support the final remediation objectives of a project provides maximum benefit when performed as promptly as practical.

4.5 Early actions, short-term remedies, or interim remedial measures are effective risk management tools when designed and executed properly. Some common benefits derived from early actions are as follows: (1) human, ecological, and financial resources are protected; (2) the actual time required to

remediate an unacceptable environmental condition is minimized or reduced; (3) the geometric magnitude or scale of an unacceptable environmental condition is reduced; (4) the complexity and scope of a final remedial solution is reduced; and (5) environmental projects become “solution” oriented.

4.6 A successful strategy for the application of early actions has been developed. The strategy consists of phases or steps that are as follows:

4.6.1 Development of a list of potential proactive early action remedies.

4.6.2 Identification of candidate sites for early action.

4.6.3 Identification of site-specific and easily definable CSM components(s).

4.6.3.1 Establishing and prioritizing early action objectives for each CSM component.

4.6.3.2 Identifying early action alternatives to address each objective and identifying anticipated or expected results and their impact on final regulations and remedy.

4.6.3.3 Seeking regulatory and public comment, as appropriate.

4.6.4 Establishment of funding availability for early actions.

4.6.5 Prioritization of early action solutions consistent with the objectives, public response, expected results, and funding availability.

4.6.6 Selection and integration of early action solutions.

4.6.6.1 Selecting criteria for management and measurement of the results and progress of early action.

4.6.6.2 Establishing documentation and recording procedures and requirements for early action implementation and effective final remedy implementation.

4.6.6.3 Analyzing the validation approach prior to the implementation of early action.

4.6.7 Preparation and finalization of the early action remedial plan.

4.6.8 Implementation and documentation of early action activities.

4.6.8.1 Validating early action results in comparison to the early action plan and the final remedial action frequently and periodically.

4.6.8.2 Reviewing the documentation of all early action activities frequently and periodically.

5. Significance and Use

5.1 This guide is intended to provide a systematic approach for the application and execution of early actions for purposes of remediating sites of both hazardous and non-hazardous contamination. Fundamental to the use of this guide is the iterative development of a CSM.

5.2 Anticipated users of this guide are owners or operators at sites of environmental contamination; technical professionals involved in the field of environmental site characterization and remediation; environmental regulators, property owners, employees, and residents adjacent to sites of environmental contamination; and lenders, sureties, and persons of general interest within an affected community.

5.3 This guide is not intended to replace legal requirements for remediating sites of environmental contamination. This guide should be used to supplement existing regulatory guid-

ance and to focus remedial efforts toward final remedy solutions.

6. Procedure

6.1 *Assembling Required Information*—Assemble all available information, including the following: historical records, interviews, previous studies, environmental analytical data, permits, regulatory guidance and requirements, maps, geologic cross sections, engineering infrastructure as-built plans, and drawings. At least one site visit by technical personnel tasked with the responsibility of designing and implementing an early action is required prior to the development of a remedial plan.

6.2 *Development of the Conceptual Site Model*—An initial concept of the site(s) conceptual site model should be developed using all assembled information. The quality and accuracy of all information should be assessed both quantitatively and qualitatively, and the use of the information should be focused on the following:

6.2.1 *Identification of Contaminants*—Identify the environmental contaminants for all pathways of a conceptual site model. Particular emphasis should be placed on identifying the contaminants for any suspected exposure pathways of concern.

6.2.2 *Characterization of Background Conditions*—The natural and secondary (modified) background concentration of contaminants in all conceptual site model pathways must be characterized or estimated in order to design a useful early action. This information is necessary in order to develop appropriate action levels, identify possible synergism, estimate environmental risk, and identify and design remedial solutions.

6.2.3 *Contaminant Source Characterization*—An understanding of contaminant source characteristics is essential in developing a successful early action remedy. At a minimum, the following source characteristics should be measured or estimated for a site:

6.2.3.1 Source location, boundaries, volume, and mass;

6.2.3.2 Hazardous constituents and their concentration at a source;

6.2.3.3 Time, duration, rate of volume, and mass contaminant release from a source; and

6.2.3.4 Suspected areas (three dimensional) of contaminant migration within a pathway from a point or source release.

6.2.4 *Migration Pathway Characterization*—Potential contaminant migration pathways through the soil, surface water, air, and ground water must be identified and characterized primarily for each source of contamination at a site. The minimum information or characterization requirements for developing an early action for each migration pathway type is as follows: (1) an evaluation and estimate of the contaminant mass released and its release mechanism to a pathway, (2) identification of the transport mechanism and an estimate of contaminant transport rate or dispersion within a pathway, or both; and (3) identification of the human and ecological receptors at potential points of exposure above levels of acceptable risk on a contaminant migration pathway.

6.2.5 *Contaminant Mass Estimate*—An estimate of contaminant mass and contaminant distribution is required for developing successfully focused early action remedies.

6.2.6 *Receptor Exposure Characterization*—Estimates of the concentration and duration of both human and ecological

contaminant exposure should be developed for each exposure point within a migration pathway.

6.2.7 Estimation of Human and Ecological and Other Risk—Early actions are engineered risk management solutions. An estimate or perception of unacceptable risk should exist before an early action is considered and developed. There are many categories of environmental risks; some examples are human and ecological risk, financial risk, community relations, etc.

6.3 Identification of Early Action Strategy—Most successful early actions or interim remedial measures incorporate a strategy that emphasize a technical approach that expeditiously balances and expedites the technical requirements and needs of a project risk and available resources. The elements of a proven strategy for developing and implementing early actions, as summarized in 4.6, are discussed as follows.

6.3.1 Proactive Development of Early Action Remedies—It is important for all affected parties to provide input within the framework of a “positive” forum to identify their concerns, risks, resources, and objectives for an early action. The development and implementation of an optimum early action will be delayed unless a proactive and technically focused environment of cooperation is developed among the parties affected by environmental contamination concerns. It is especially important for time and resource critical projects to foster proactive interaction on technical issues. ASTM advocates the early solicitation and consideration of community concerns. Some examples of early action remedies are listed in Appendix X1.

6.3.2 Identification of Early Action Candidate Sites—Not all sites of environmental contamination are appropriate candidates for early action. Sites that are dynamic and contain complex migration pathways commonly require sophisticated and detailed site characterization before sufficient technical information is available to design an appropriate partial remedy. Usually, the more simplistic an environmental problem, the more likely the site is to be a candidate for an early action remedy.

6.3.3 Identification of Manageable CSM Components and Early Action Solution Alternatives:

6.3.3.1 Each site of environmental contamination has a CSM component appropriate to manage for the control of human or ecological risk. Three examples are as follows: (1) as a pathway control, surface water diversion and runoff control from a contaminant release area may be a useful CSM component to manage for risk control; (2) source control or removal of a contaminant release to the environment may prevent migration of contaminant mass through a pathway to a receptor; and (3) fencing or warning signs of hazardous contaminants. Identification of the CSM components appropriate for engineered risk management is often the most critical element for developing a successful early action. Regulatory agency involvement is recommended to communicate the evaluation of the CSM components. Early agreement to the strategy by the regulatory agencies is essential.

6.3.3.2 Each CSM component identified should have well-defined risk management and mitigation objectives, each with associated desired and anticipated results from the potential

early action solutions. These CSM components and objectives should be prioritized as the primary basis for evaluating alternatives and desired results. To the extent practical at this stage in the strategy, the possible impact on projected final remedies should be considered while the CSM components, objectives, and expected results are being identified and prioritized.

6.3.3.3 Public participation should be solicited and evaluated whether or not legally required. Early public/citizen participation may reveal objectives and concerns in addition to technical and site issues that could jeopardize the future success of the early action unless considered in all phases of the strategy.

6.3.3.4 At many sites where early actions have been implemented, often only one potential technical remedy was considered. The identification of several potential multiple technical solutions *targeted at the most appropriate CSM components* is essential if the most flexible, timely, and technically responsive remedy(ies) is to be developed for that site.

6.3.4 Funding of Early Actions—Few sites have been remediated successfully using early actions alone and seldom are all contaminant migration pathways and risks understood at the early stages of a remedial project, the time when many early actions are performed. For these reasons, it is advisable to identify and allocate (budget) only a reasonable portion of the available funding for early action, which is balanced between cost and risk management benefits. The available funding levels should be used to guide and focus the following steps toward a realistic early action solution. If the human or ecological risks identified in the CSM component(s) cannot be addressed adequately by available funding, other or additional funding alternatives should be considered.

6.3.5 Prioritization of Early Action Solutions—The alternative elements, including desired results and technical components, of a proposed early action should be prioritized by the affected parties. It is important that the prioritization be performed in a proactive fashion to ensure that most critical and beneficial elements of an early action are implemented. The resulting priority should be consistent with the technical and risk management objectives, public response, expected results, and available funding.

6.3.6 Selection and Integration of Early Actions—Based on the priority of alternative solutions, selection of the most beneficial solution should be conducted before formulating a remedial implementation plan. Performance criteria should be selected to document and measure progress toward the expected results in order to integrate the selected early action with follow-on remedial activities and a final remedy. These criteria should be incorporated into the remedial plan and include, as a minimum, recording and reporting procedures by the responsible party, interim technical objectives and schedule, budgetary objectives and constraints, reporting format for public participation, and documentation of early action activities useful for final remedy preparation and implementation. The criteria resulting from the selection process should also include an analysis to validate that the selected early action approach does, in fact, satisfy the risk management objectives and the CSM components.

6.3.7 Preparation and Finalization of Remedial Plan—Regulatory agencies often have format and content requirements for remedial plans; however, the regulatory agency requirements may be minimal for many of the example early actions listed in Appendix X1. The preparation of early action remedial plans must meet these regulatory requirements to receive approval. The remedial plan should be sufficiently detailed to provide guidance for implementation but simple enough to allow flexibility to respond to changing technical and site conditions. Specifically, it should be noted that site characterizations activities may be ongoing during early action activities on complicated contaminated sites with complex CSMs. This ongoing site characterization will contribute developments and refinements to the CSM that may require changes to the early action remedial plan.

6.3.8 Implementation and Documentation of Early Action Activities—During implementation of the plan, the results must be documented faithfully and compared to the original objectives frequently. Actual results and progress during the early action must be validated as achieving the targeted objectives. Consistency with a projected final remedy must be validated frequently during implementation of the early action.

6.3.9 At some sites where early actions have been implemented, valuable technical information has been lost or not properly documented, recorded, and reported by the responsible party. For example, early and undocumented removal and disposal of contaminated soil resulted in lack of contaminant characterization chemical data and knowledge concerning the volume of the removed soil. This lack of information made it difficult and more costly to plan and implement a final remedy. Extreme care and extra expense may be needed to ensure proper documentation. There must be proper documentation and record-keeping in order for the early action strategy to benefit the final remedy.

6.4 Identification of Requirements for Early Actions—Some requirements for developing as early action are site specific. The following sections discuss those requirements that must be considered for any interim remedial measure or early action. Often, although not always required, written documents describing the following topics are developed and submitted to legal entities for approval.

6.4.1 Legal Authority—Early actions must meet those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environment or state environmental or facility citing laws that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstances found at a hazardous waste, RCRA, or CERCLA site. Only those state standards that are identified by a state in a timely manner and that are more stringent than federal requirements may be applicable. Many different legal requirements may impact the design and implementation of an early action. Early actions are commonly authorized by the following: (1) letters of agreement, (2) interim records of decision, (3) engineering estimates and cost analysis (EECAs), and (4) permit amendments. There are many other types of legal mechanisms that may also be used to authorize or approve early actions.

6.4.2 Health and Safety Plan—The operational health and

safety aspects of implementing an early action must be considered. Typically, emergency response plans, site evacuation plans, worker safety, and alternate pathway contaminant transport (for example, soils contamination transported in the air pathway during waste excavation) control are topics that are considered and discussed by a health and safety plan.

6.4.3 Sampling and Analysis Plan—Most early actions incorporate some sampling and analytical testing; however, it is not always required. Samples are frequently collected to monitor treatment efficiency, characterize wastes for disposal, and characterize a site further as components of an early action. All sampling and analysis plans (SAPs) should identify the following: sampling procedures; sampling frequency; preservation, transport, and handling techniques; decontamination procedures; analytical methods; and quality assurance/quality control (QA/QC) systems that are associated with the environmental data generation process. Additional guidance for these efforts is available by reviewing the following:

6.4.4 Early Action Plan—All early actions must have a remedial plan. The remedial plan describes how an early action will be implemented. Operational items that should be addressed by the remedial plan are discussed as follows:

- (1) Security,
- (2) Mobilization/demobilization,
- (3) Unit/system operation,
- (4) Unit/system test/performance monitoring,
- (5) Community relations,
- (6) Site analysis,
- (7) Contaminant mass balance,
- (8) Waste characterization/management plan, and
- (9) Permits.

Early action plans address complex technical issues affecting operation and execution of the remedy, but they are often relatively short and simple documents.

6.4.5 Execution and Implementation of Early Action Plan—It is usually not possible to deviate from an approved early action plan. Operations should conform to the plan unless circumstances require change and written authorization for plan modification is obtained. Documentation of all operations and activities must be maintained to verify that the early action plan was implemented correctly and fully and to demonstrate what was accomplished at a future date. Documentation such as the following is necessary so that the final remedy can be selected and implemented without delay and question:

6.4.5.1 Records of Public Participation—Notes of all public meetings; records of responses to public comments and meetings.

6.4.5.2 Field Logs—Daily records of activities, site manager; health and safety meeting notes; transportation, disposal, treatment records; field sampling records and sample identification; site entry logs; all other records to document field activities.

6.4.5.3 Analytical Data Records—Chain of custody records to document field sampling records; purchase orders for traceability of laboratory data and expenses to project; analytical data results and QC data/records.

6.4.5.4 Early Action Results—Chronological comparison of

remedial plan with actual activities; soil excavation history and verification sampling results to verify that post excavation remedial goals were met; volume and disposition (location) of contaminated material removed from site; analytical data associated with disposal and waste management activities; all waste management and disposal manifests and bill of latent (solid, sludge, liquids, etc.); documentation of all post remedial site restoration activities; copies/records of all written and verbal correspondence with property owners, public media, and regulatory agencies; recommendations/lessons learned for final remedy.

6.4.6 *Documentation Retention*—Responsibility for record keeping rests with the property owner. Documentation for early actions taken under CERCLA should be maintained in the administrative record. This documentation should be maintained for other sites as part of the legal records for the site.

6.4.7 *Post Remedy Monitoring Plan*—Many early actions will require that the success of the remedy be monitored during

its operation. It is advisable to develop an operation and monitoring plan prior to, or in conjunction with, development of the remedial plan.

6.4.8 *Early Action Performance Assessment*—The success of an early action should be assessed by comparing its actual result to the predicted goal or desired objective.

6.5 *Other Considerations*—In addition to the previously discussed requirements, other factors must often be considered when developing a remedial plan for an early action. Some of the more common factors of this type are as follows: (1) funding limitations, (2) time constraints, (3) community acceptance, and (4) technology availability.

7. Keywords

7.1 conceptual site model; early action; environmental risk management; hazardous waste; interim-remedial measure; nonhazardous waste; short-term remedy; site characterization; site remediation; waste management

APPENDIX

(Nonmandatory Information)

X1. EXAMPLES OF EARLY ACTION REMEDIES

X1.1 Some examples of early action remedies are as follows: fences; site access controls; warning signs; physical security; covers; barriers; underground barrier walls; drainage controls; runoff diversion barriers; berms; dikes; impoundment areas; capping; neutralizing chemicals; removal of debris;

removal of drums, tanks, containers; removal of soil or solid materials; removal of liquids; in-situ treatments; bioremediation; alternate water treatment process; provision of alternate potable water sources or supplies; and provision of alternate habitat.

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