RCRA Subtitle C 101

Presented by the

ASTSWMO Hazardous Waste Subcommittee

April 7, 2026

Webinar Components & Presenters

- Introduction/Overview

  Melissa Ferree (DE), Chair, Hazardous Waste Subcommittee

- Rulemaking and Authorization

  Ellie Brown (OR), Chair, Rulemaking and Authorization Task Force

- Compliance Monitoring and Enforcement

  Introduction: Joe Sizemore (WV), Chair, Compliance Monitoring and Enforcement Task Force

  Speaker: Valerie Blomgren (AZ), Region 9 Member, Compliance Monitoring and Enforcement Task Force

- Permitting and Corrective Action

  Aaron Newton (KY), Chair, Corrective Action and Permitting Task Force

- Data Management/RCRAInfo

  Jennifer Hopper (MD), Chair, Program Information Management Task Force

Federal RCRA Statute

- Resource Conservation and Recovery Act – passed in 1976
- Enacted “cradle-to-grave” requirements for hazardous waste management
  - Addresses hazardous waste management from generation to transportation to treatment, storage, or disposal
- Authorized the Environmental Protection Agency to adopt regulations governing the management of hazardous waste

Federal RCRA Subtitle C Regulations

Found in Title 40 - Protection of the Environment - of the Code of Federal Regulations (CFR), parts 260 through 273. A list on the U.S. EPA website of all solid waste regulations that includes links to the regulatory text is below:

- Part 260 – Hazardous Waste Management System: General.
- Part 261 – Identification And Listing Of Hazardous Waste.
- Part 262 – Standards Applicable To Generators Of Hazardous Waste.
- Part 263 – Standards Applicable To Transporters Of Hazardous Waste.
- Part 264 – Standards For Owners And Operators Of Hazardous Waste Treatment, Storage, and Disposal Facilities.
- Part 265 – Interim Status Standards For Owners And Operators Of Hazardous Waste Treatment, Storage, and Disposal Facilities.
- Part 266 – Standards For The Management Of Specific Hazardous Wastes And Specific Types Of Hazardous Waste Management Facilities.
- Part 267 – Standards For Owners And Operators Of Hazardous Waste Facilities Operating Under A Standardized Permit.
- Part 268 – Land Disposal Restrictions.
- Part 270 – EPA Administered Permit Programs: The Hazardous Waste Permit Program.
- Part 271 – Requirements For Authorization Of State Hazardous Waste Programs.
- Part 272 – Approved State Hazardous Waste Management Programs.
- Part 273 – Standards For Universal Waste Management.

Rulemaking & Authorization

What is Authorization?

EPA's approval for a State to administer the federal RCRA program.

AUTHORIZED STATE	UNAUTHORIZED STATE
Implements RCRA under EPA oversight	EPA directly implements RCRA

40 CFR Part 271 — Requirements for Authorization of State Hazardous Waste Programs
Rules/procedures and criteria for approval, program revisions, and withdrawal

40 CFR Part 272 — Approved State Hazardous Waste Management Programs
State-by-State codification/incorporation by reference and revisions

Federal Rulemaking, State Adoption, and Authorization

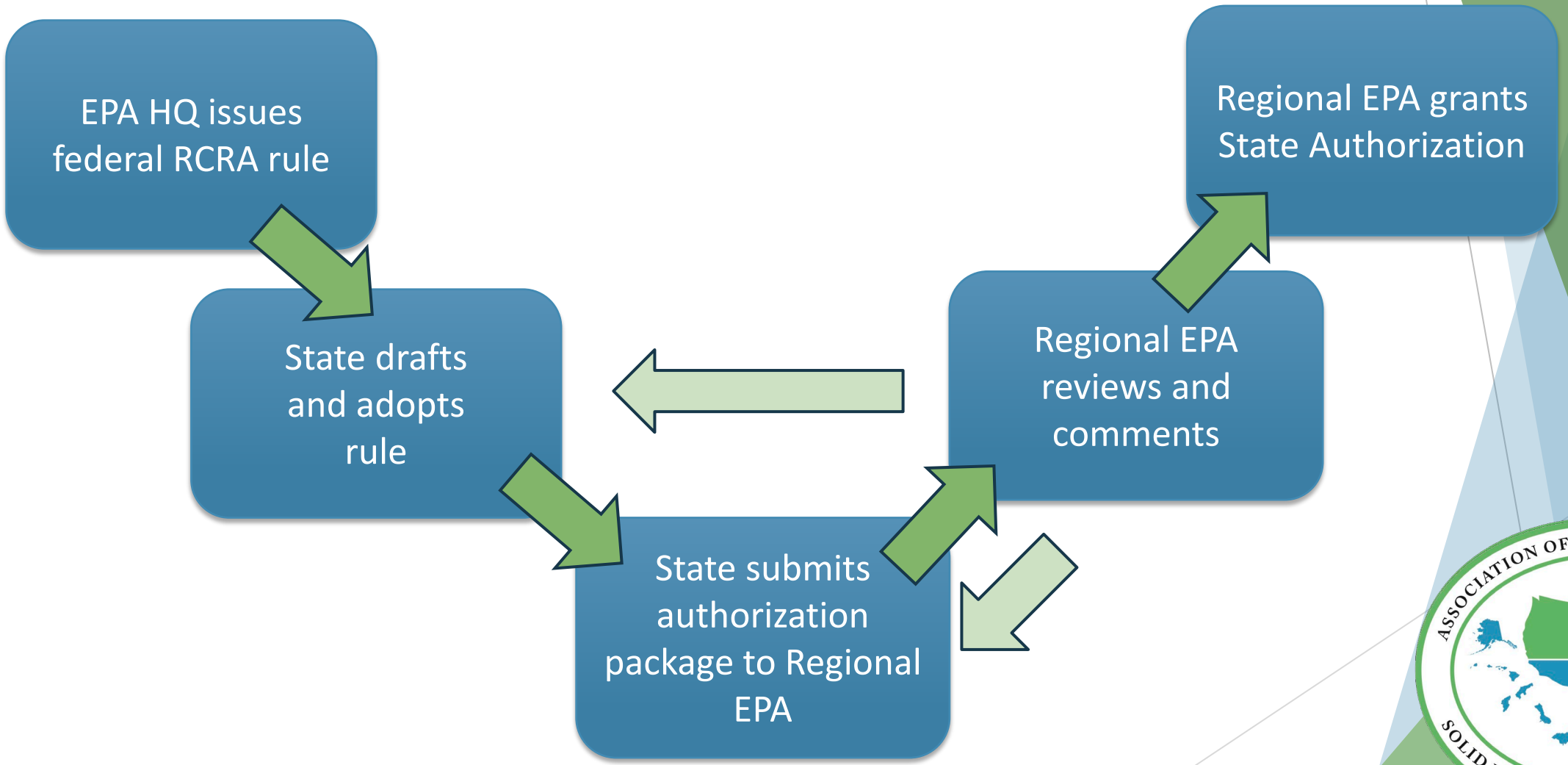
Federal Rulemaking: EPA revises rules

State Rulemaking: State adopts revisions

Authorization

- EPA approval issued to a State
- Occurs after federal rules are adopted by a State

How RCRA Authorization Works



Authorization Application Package Components

Public

- State regulations
- Rule checklists
- Program Description
- Attorney General's Statement
- Memorandum of Agreement

Process

HSWA vs. Non-HSWA Rules

HSWA Rules

- Established by the Hazardous and Solid Waste Amendments
- Take effect nationwide immediately
- Apply in all States, regardless of authorization status

Non-HSWA Rules

- Other federal RCRA rules
- Take effect in States only after State adoption
- Authorization is required for full State implementation

40 CFR 271.25

EPA and State Roles

State (Authorized Program)

- Primary responsibility for implementing RCRA
- Operates under EPA oversight

EPA

- Oversees state programs
- Retains authority
- Directly implements certain rules

EPA Oversight Mechanisms

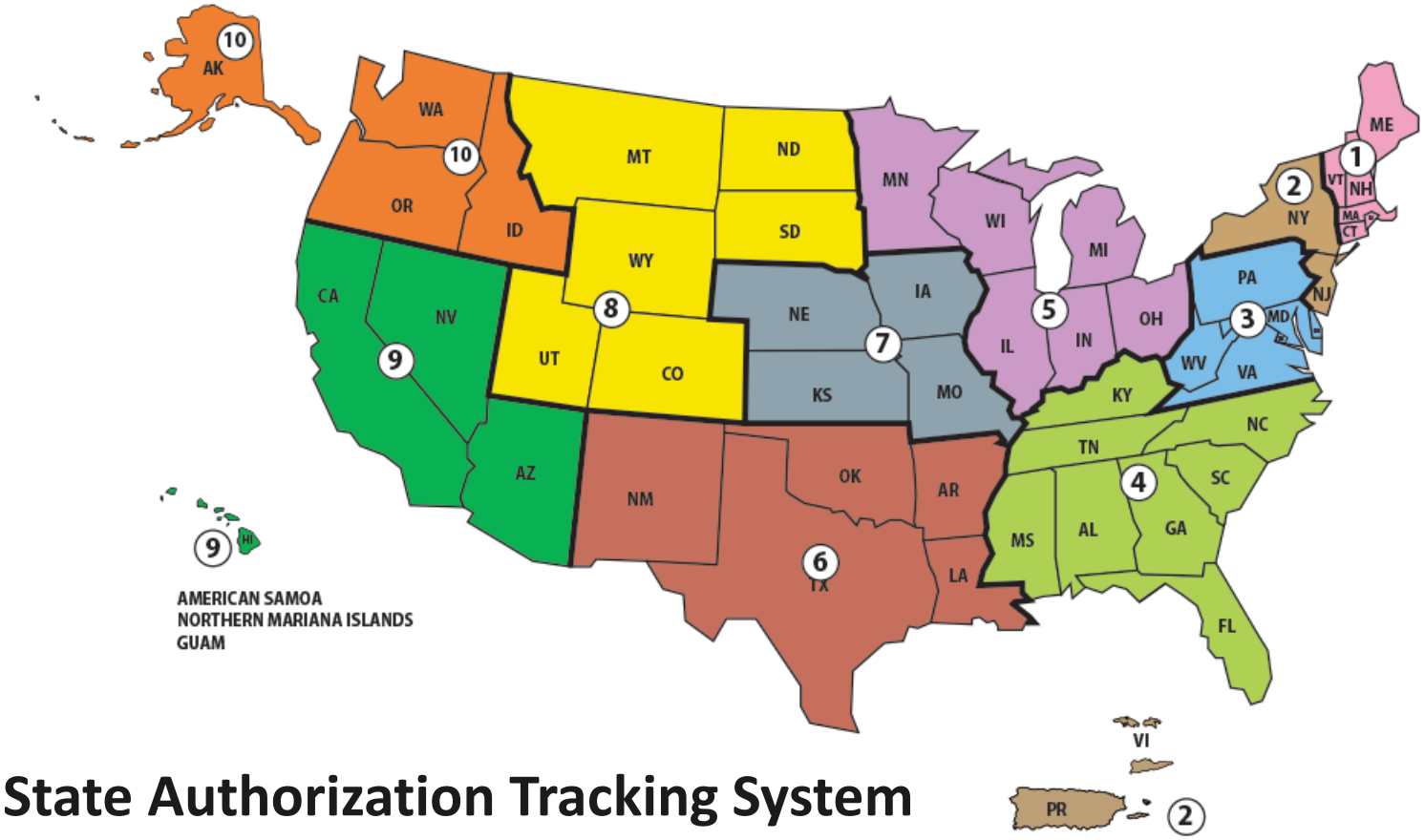
Grants & Workplans

- Biennial cycle
- Work commitments
- Progress performance reporting

State Review Framework

- Multi-year “rounds”
- Data metric & file review
- Report: findings & actions

Authorization Status Varies by State & Rule



EPA's State Authorization Tracking System (StATS)

ASSOCIATION OF STATE AND TERRITORIAL SOLID WASTE MANAGEMENT OFFICIALS

Compliance Monitoring and Enforcement

Hazardous Waste Inspections and Enforcement

What is considered a waste?

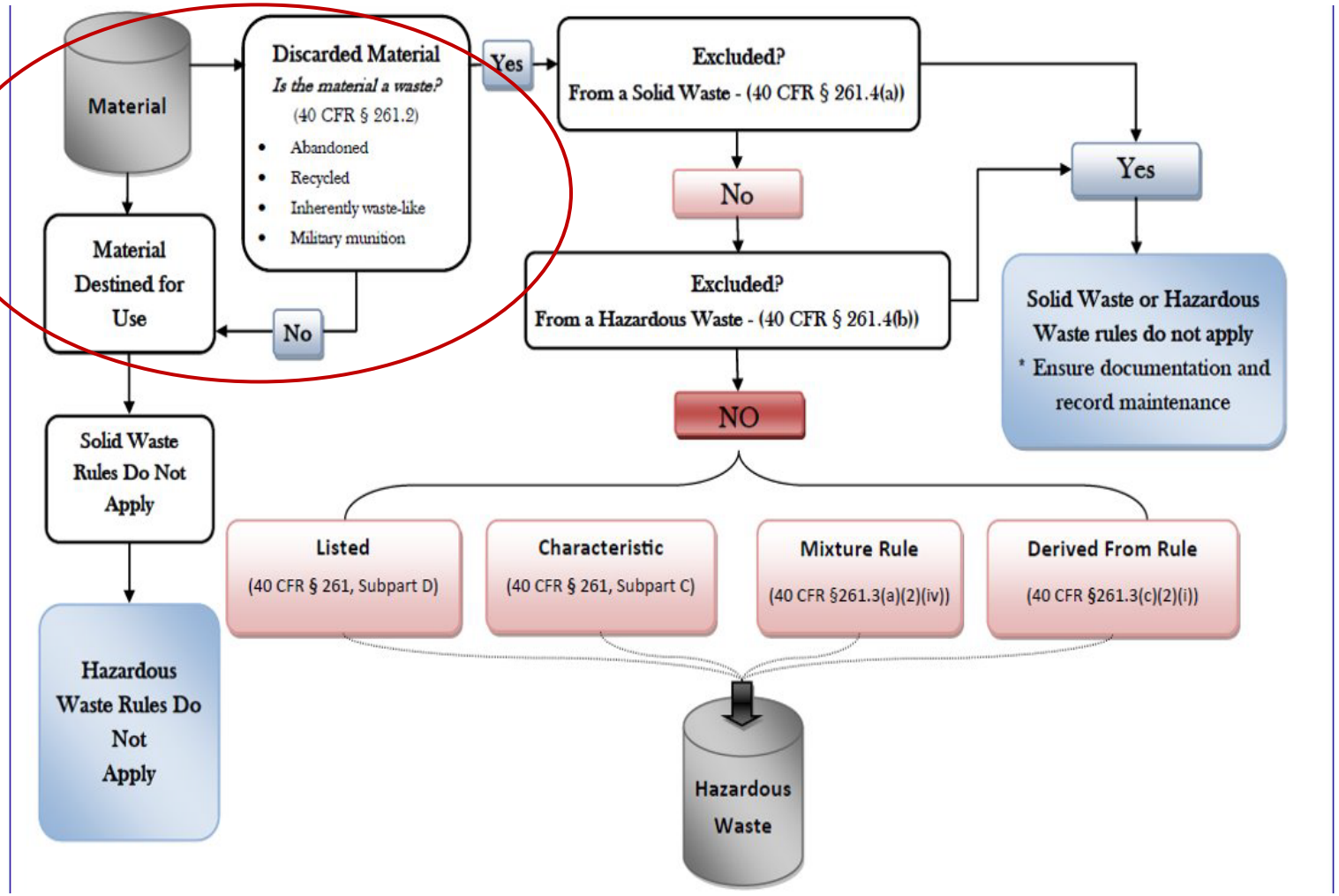
What is a hazardous waste inspection?

Who has jurisdiction to inspect and enforce?

Resource Conservation and Recovery Act (RCRA)

Under the federal RCRA, hazardous waste is defined as a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical/chemical characteristics may cause or significantly contribute to increased mortality or serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly managed (40 CFR § 261.10)

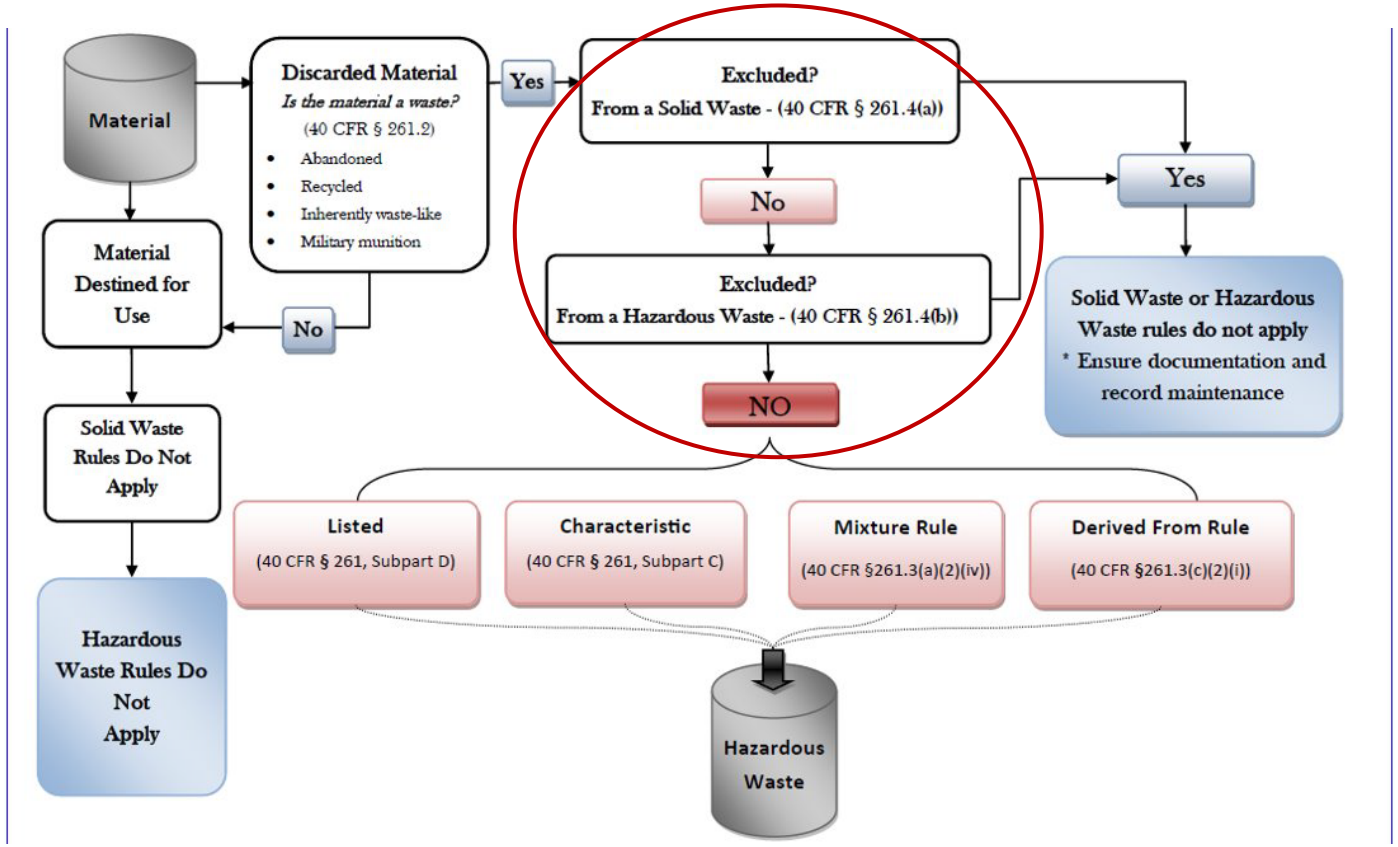
Identifying waste



Step 1: Solid waste definition

- Abandoned (40 CFR § 261.2(b))
  - Disposed, incinerated or burned, treated (but not recycled), or stored before being disposed
- Inherently waste-like materials (40 CFR § 261.2(d))
  - Particular waste streams or, if approved by the administrator, a material that may pose a substantial hazard to human health and the environment when recycled.
- Military munitions

Exclusions


Material
Discarded Material
Is the material a waste?
(40 CFR § 261.2)
Abandoned
Recycled
Inherently waste-like
Military munition
Yes
Excluded?
From a Solid Waste - (40 CFR § 261.4(a))
No
Excluded?
From a Hazardous Waste - (40 CFR § 261.4(b))
NO
Yes
Solid Waste or Hazardous Waste rules do not apply
* Ensure documentation and record maintenance
Material Destined for Use
No
Solid Waste Rules Do Not Apply
Hazardous Waste Rules Do Not Apply
Listed
(40 CFR § 261, Subpart D)
Characteristic
(40 CFR § 261, Subpart C)
Mixture Rule
(40 CFR §261.3(a)(2)(iv))
Derived From Rule
(40 CFR §261.3(c)(2)(i))
Hazardous Waste

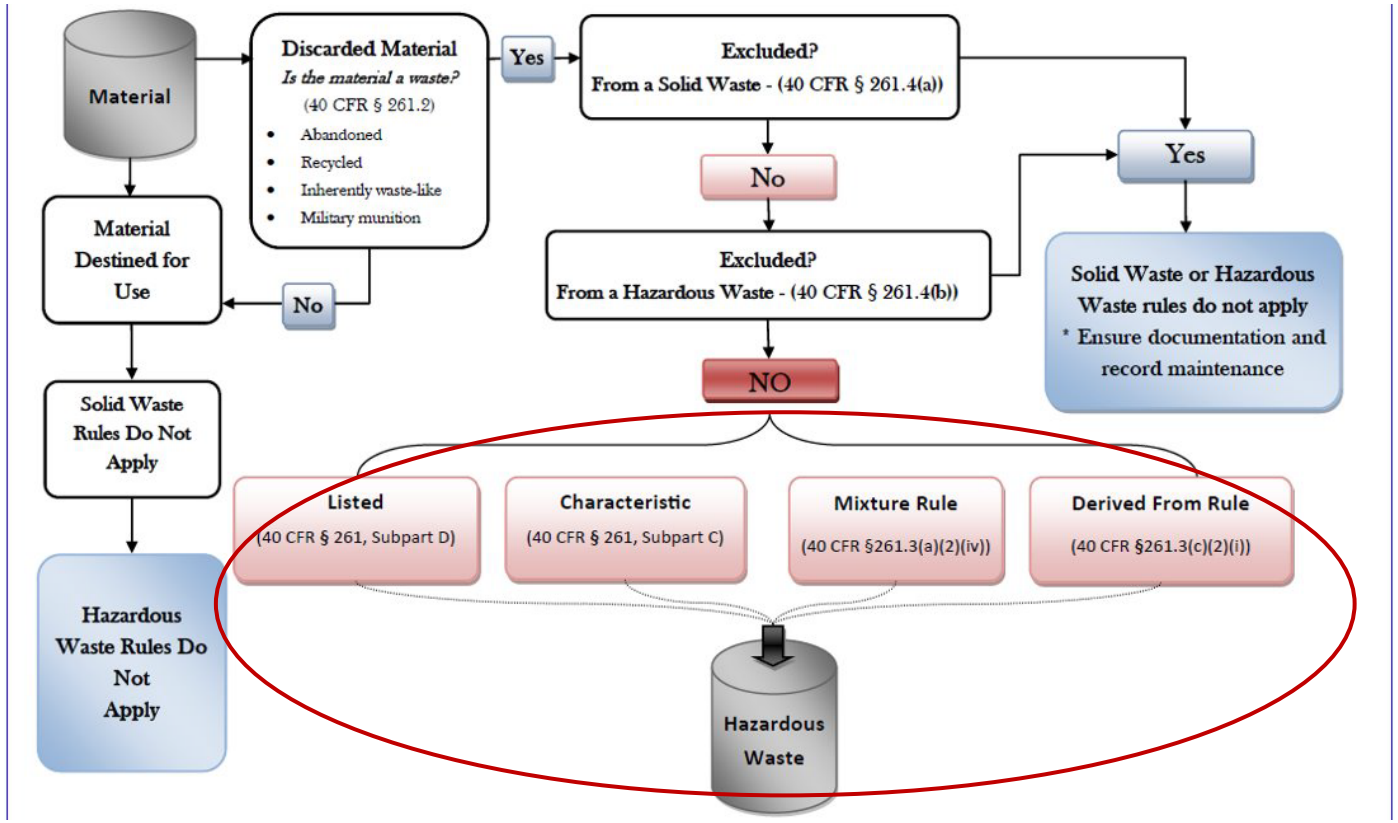
Step 2: Solid waste exclusions

- Under 40 CFR § 261.4(a) are 27 solid waste exclusions
- Examples
  - Domestic sewage
  - Industrial wastewater
  - Excluded scrap metal, see select EPA Memos 11117 (batteries, scrap metal, precious metals), 14235 (aerosol cans), 14195 (agglomerated dross)
  - Certain shredded, recycled circuit boards, see select EPA Memos 13356, 14155
  - Hazardous secondary materials (HSM), requires prove of no sham recycling, except at RCRA permitted facilities EPA HSM Checklist
  - Certain **laundered** solvent contaminated wipes, see EPA FAQs

Step 3: Hazardous waste exclusions

- Under 40 CFR § 261.4(b) are 18 hazardous waste exclusions
  - Household hazardous waste
  - Mining overburden returned to the mine site
  - Drilling fluids related to energy exploration
  - Particular wastes from extraction, beneficiation, and processing of ores and minerals
  - Certain **disposed** of solvent contaminated wipes, see EPA FAQs

Hazardous waste determination



Characteristic hazardous waste

- Ignitable – D001
  - A liquid with a flashpoint <140°F
  - A non-liquid that can ignite under standard temperature and pressure
  - An ignitable compressed gas
  - An oxidizer
- Corrosive – D002
  - An aqueous waste with a pH of <2 or >12.5
  - A liquid that corrodes SAE1020 carbon steel >0.25 per year

Characteristic hazardous waste

- Reactive – D003
  - Normally unstable and readily undergoes violent change without detonating
  - React violently with water
  - In pH conditions between 2and 12.5 generates toxic gases or vapors (cyanide or sulfide bearing wastes)
- Toxic – D004-D043
  - Exceed the toxicity characteristic limit in 40 CFR 261.24
    - 8 heavy metals
    - 6 pesticides
    - 28 solvent and other organics
  - Prepare samples by the toxicity characteristic leaching procedure (TCLP)

Figure III-7: TCLP Regulatory Levels

Waste Code	Contaminant	Concentration (mg/L)
D004	Arsenic	5.0
D005	Barium	100.0
D018	Benzene	0.5
D006	Cadmium	1.0
D019	Carbon tetrachloride	0.5
D020	Chlordane	0.03
D021	Chlorobenzene	100.0
D022	Chloroform	6.0
D007	Chromium	5.0
D023	o-Cresol*	200.0
D024	m-Cresol*	200.0
D025	p-Cresol*	200.0
D026	Total Cresols*	200.0
D016	2,4-D	10.0
D027	1,4-Dichlorobenzene	7.5
D028	1,2-Dichloroethane	0.5
D029	1,1-Dichloroethylene	0.7
D030	2,4-Dinitrotoluene	0.13
D012	Endrin	0.02
D031	Heptachlor (and its epoxide)	0.008
D032	Hexachlorobenzene	0.13
D033	Hexachlorobutadiene	0.5
D034	Hexachloroethane	3.0
D008	Lead	5.0
D013	Lindane	0.4
D009	Mercury	0.2
D014	Methoxychlor	10.0
D035	Methyl ethyl ketone	200.0
D036	Nitrobenzene	2.0
D037	Pentachlorophenol	100.0
D038	Pyridine	5.0
D010	Selenium	1.0
D011	Silver	5.0
D039	Tetrachloroethylene	0.7
D015	Toxaphene	0.5
D040	Trichloroethylene	0.5
D041	2,4,5-Trichlorophenol	400.0
D042	2,4,6-Trichlorophenol	2.0
D017	2,4,5-TP (Silvex)	1.0
D043	Vinyl chloride	0.2

*if o-, m-, and p-cresols cannot be individually measured, the regulatory level for total cresols is used.

Listed Wastes

- Does not require analytical testing or evaluating the waste's properties.
- EPA made lists of specific waste streams or chemicals that they knew posed a threat when disposed of.
- Four lists: F, P, U, and K Lists

The Lists

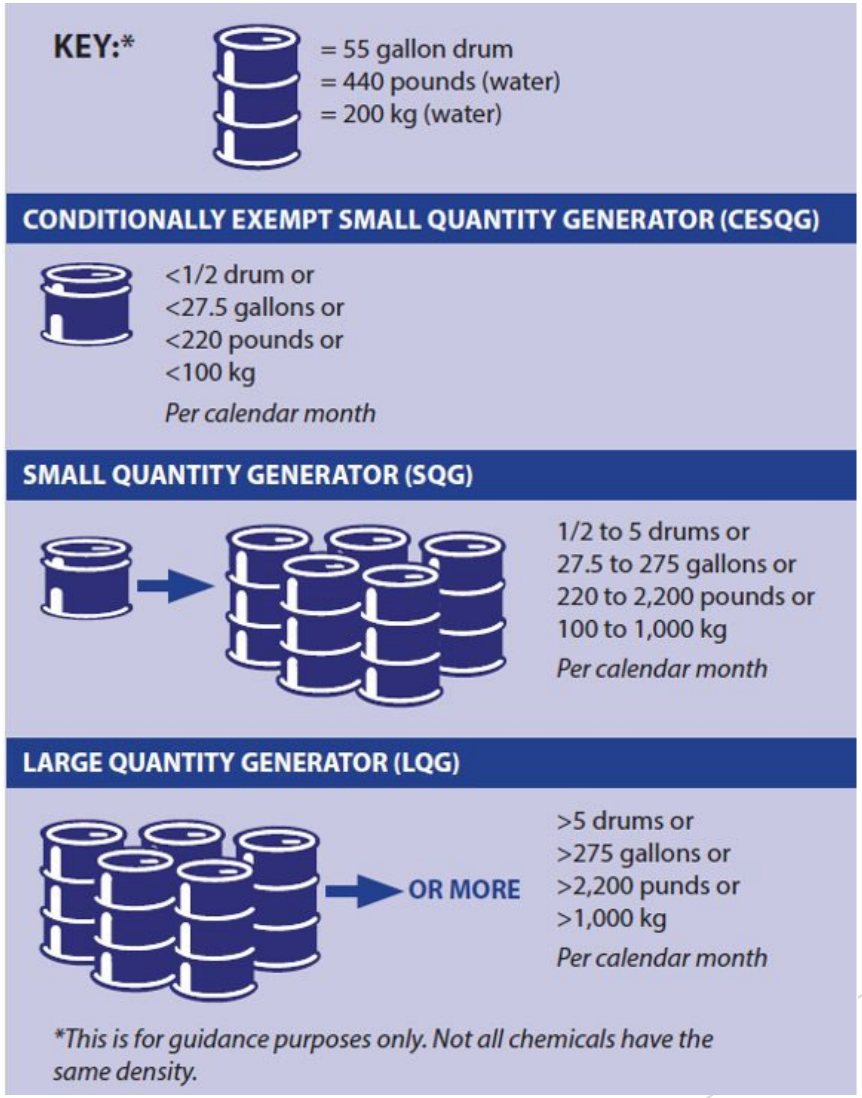
- F List – non-specific sources
  - Spent solvents (F001-F005)
  - Electroplating or chemical conversion coating wastes (F006-F019)
  - Dioxin bearing wastes
  - Wood preserving wastes
- P and U Lists – commercial chemical products
  - Sole active ingredient
  - Unused materials
  - Off-spec materials
  - Containers that held P or U listed waste
  - Spill residues
- K List – specific industries or sources
  - Iron and steel emission control dust/sludge

Universal Waste

- Small quantity **handlers** generate less than 5,000 kg. The waste is not counted towards a facility's generator category.
- Universal waste refers to a subcategory of hazardous waste—commonly generated by households, businesses, and institutions—that poses a lower immediate risk than other hazardous wastes.
  - Lamps – Fluorescent, high intensity discharge, mercury vapor, neon, metal halide, high pressure sodium
  - Mercury containing equipment – thermostats, switches
  - Batteries – lead-acid, lithium-ion, nickel-cadmium
  - Pesticides
  - Aerosol cans, see EPA Rule Summary
- Requirements: Label containers as "Universal Waste – type of waste" e.g. Lamps, batteries, aerosol cans. Label the accumulation start date and ensure offsite transport within a year. See EPA overview here

Generator Types

- Large Quantity – generates > 1,000 kg (2,200 lbs) per month or more than 1 kg (2.2 lbs) of acutely hazardous waste
- Small Quantity – generates more than 100 kg (220lbs) per month but less than 1,000 kg (2,200 lbs) per month
- Very Small Quantity– generates less than 100 kg (220 lbs) per month or 1 kg (2.2lbs) or less of acutely hazardous waste



Large and Small Quantity Generator Requirements

LQG – 262.17

- Time – 90 days
- Max allowed – no limited
- Training – RCRA, emergency response
- Contingency Plan and Quick Reference Guide

SQG – 262.16

- Time – 180 days (270 days if shipped > 200 miles)
- Max allowed – 6,000 kg
- Training – RCRA, emergency response
- Emergency posting in accumulation areas
- Subject to episodic/short-term events

Both

- Date / label
- Closed containers
- Manifest waste to track waste from cradle to grave

Very Small Quantity Generator Requirements

VSQG – 262.14

- Waste Determination
- Ensure delivery to a Treatment Storage Disposal Facility (TSDF)
- If storing above 1,000 kg, then follow additional conditions
- Manifesting only required for episodic events
  - Episodic event rules are under 40 CFR Part 262 - Subpart L

For questions on Hazardous Waste Generator Improvements Final Rule, which includes episodic events, see the EPA FAQs.

Treatment Storage and Disposal Facilities (TSDF)

Permitted facilities that conduct one or more of the following operations:

- Heat treatment
- Storage of recyclable materials for longer than 24 hours prior to recycling
- Corrective action sites
- Storage beyond generator time limits, IE: 90 days for LQGs, 180 days for SQGs
- Storage beyond universal waste time limits, IE: one year
- Storage, treatment, or disposal of hazardous waste accepted from off-site
- Land disposal
- Post closure care

EPA and state authorization

- An authorized state under the Resource Conservation and Recovery Act (RCRA) is a state that has received approval from the U.S. Environmental Protection Agency (EPA) to implement its own hazardous waste program in lieu of the federal program.
- Under this authority, the state has primary responsibility for enforcing RCRA hazardous waste requirements, with regulations that are at least as stringent as the federal standards.
- EPA also retains authority for inspections and enforcement and will do a few inspections in authorized State annually. EPA will inspect against the specific regulations the State is authorized for.

RCRA Compliance Monitoring Strategy (CMS)

- The basic CMS for States is:
  - 20% of LQG and Reverse Distributors are inspected annually.
  - Private TSDFs are inspected every two years.
  - State and Federally owned TSDFs are inspected annually.

- Alternatives to the traditional CMS are available.

Inspection Process

- Prepare for the Inspection
  - Define the scope of the inspection, determine number / type of inspectors needed, determine what requirements apply, research the operating units, prepare for sampling if needed, contemplate accessibility and any needed health and safety considerations.
- Conduct the Inspection
  - Present credentials, determine equipment / camera policies, conduct walkthrough, review applicable documents, exit interview.
- Documenting the inspection
  - Review collected data, prepare report and include all supplemental documentation, make a clear compliance determination

Enforcement Process

- Responsible parties will receive the appropriate level of enforcement with consideration of deviation from the requirement, potential for harm to human health and the environment and their compliance history.
- Informal enforcement, such as a Notice of Violation (NOV)
  - Notify Responsible Party that violations were observed and documented
- Formal enforcement such as a Consent Order or Compliance Order
  - Administrative, Civil, Criminal
  - May include penalties and injunctive relief
- Every State will be different but must demonstrate to EPA the legal authority to take enforcement through authorization process

RCRA 101

Permitting and Corrective Action (Hazardous Waste Clean-Up)

Permitting Outline

- Definitions
- Authority
- Purpose
- Content of an Application
- Content of a Permit
- Modifications
- Renewal

Definitions – 40 CFR 260.10 (but in plain language)

- Treatment – Changing the physical and chemical characteristics.
- Storage – Holding it prior to treatment or disposal.
- Disposal - Putting it somewhere such that it could make it's way into the surrounding environment.

TSDFs

- Treatment, Storage, and Disposal Facilities
- Actively engaged in permit required Treatment, Storage, and/or Disposal of hazardous waste (i.e. an operating facility)
- Must be permitted

Permitted vs Interim Status

- Interim status is the period PRIOR to permitting
- 40 CFR 265 – Rules for Interim Status Facilities
- 40 CFR 264 – Rules for Permitted Facilities
- Very few interim status facilities today

Types of Facilities = Types of Permit

- Operating TSDF
  - Active management of HW requiring a permit
- Post Closure
  - A former TSDF that closed with waste in place (landfills, surface impoundments, etc)
- Corrective Action Only
  - No active management, no post-closure units, cleanup remaining

Authority to Permit

- RCRA §3005 – Authorizes issuing of permits for HW management
- 40 CFR Part 270 – Regulation implementing permit program
- 40 CFR Part 124 – Process of issuing a permit
- State Authorization – Adoption of federal program and approval by EPA

Purpose of a Permit

- Legally enforceable document
- Establishes requirements for:
  - Construction
  - Operating conditions
  - Clean up
  - Closure
  - Reporting
  - AND MORE

Content of Application

- Part A
  - Federal Forms 8700-12 and 8700-23
  - State Forms
- Part B
  - 40 CFR Part 270 Subpart B
  - 40 CFR 270.28 – Post-Closure Exemptions
- Checklists

Content of Permit

- Legal Authority
- Standard Conditions
- Specific Conditions
- Other sections may vary
- Incorporation of Application

- Federal Model Permit

Closure

- Removal of Waste
- Decontamination
- Certification
- Clean Closure vs “Dirty” Closure (waste in place)

Financial Assurance

- 40 CFR 264 Subpart H
- Closure AND Post Closure
- Cost Estimate
- Mechanism

Life and Renewal

- Not to exceed 10 years
- Renewal application required 6 months prior
- Timely renewal application extends effective period of permit

Modifications

- 40 CFR Part 270.42
- Three Classes
  - Class 1 – minor changes, only some require approval
  - Class 2 – Slightly more significant, requires approval and public notice of request by permittee
  - Class 3 – Significant changes requiring public notice both by permittee(request) and by implementing agency (tentative decision to approve)

Corrective Action

(aka Hazardous Waste Clean-up Program)

- Definitions
- Applicability
- Purpose
- Typical Process
- …. And then?

Definitions

- Remedy or Remedial Measure – action taken to clean up or to prevent exposure
- Solid Waste Management Unit (SWMU) – a unit in which solid waste has been managed
- Area of Concern (AOC) – Any other area of environmental concern which does not fit the definition of a SWMU.

Applicability

- HSWA – Hazardous and Solid Waste Amendments
- 40 CFR 264.101
  - Any owner or operator seeking a permit; anywhere at the facility
  - Schedules for compliance
  - Beyond Facility boundary
  - Financial Assurance

Process

- RCRA Facility Assessment
- RCRA Facility Investigation
- Corrective Measures Study
- Corrective Measures Implementation

RCRA Facility Assessment

- Identify all SWMUs and AOCs at facility
- Fence to Fence
- Recommends further action to investigate or remediate

RCRA Facility Investigation

- Nature and Extent / Rate of migration
- Work Plan – Site Characteristics, Investigation Techniques, Project Schedule
- Report – Fate of contaminants, risks, recommendations

Corrective Measures Study

- Evaluates potential remedies
- Alternatives individually proposed and evaluated
- Addresses both Institutional and Engineering controls
- Usually recommends a remedy
- Public Participation for remedy approval
- Permit? – Modify permit to incorporate the remedy

Financial Assurance

- 40 CFR 264.101(b) and (c)
- Safeguard remedy “completion”
- Remedy Selection to include Cost Estimate
- Mechanism in place – tie it to Remedy Approval

Corrective Measures Implementation

- Final Design and Implementation
- Environmental Covenants Executed
- Engineering controls constructed
- Periodic reports may be required

Long Term Care

- “Complete” is not usually “Clean”
- Maintenance and monitoring
- Reports, certifications, renewals may be needed for life of remedy

No Further Action

- No monitoring
- No controls needed
- Suitable for unrestricted use

Tracking of Progress

- Progress Track
- RCRA Info Event Codes
  - CA550 – Remedy Constructed
  - CA800 – Ready for Anticipated Use
  - CA900 – Performance Standards Attained
  - CA999 – Cleanup Complete – No Further Action is required, and is clear for unrestricted use
- Hotel California Clause

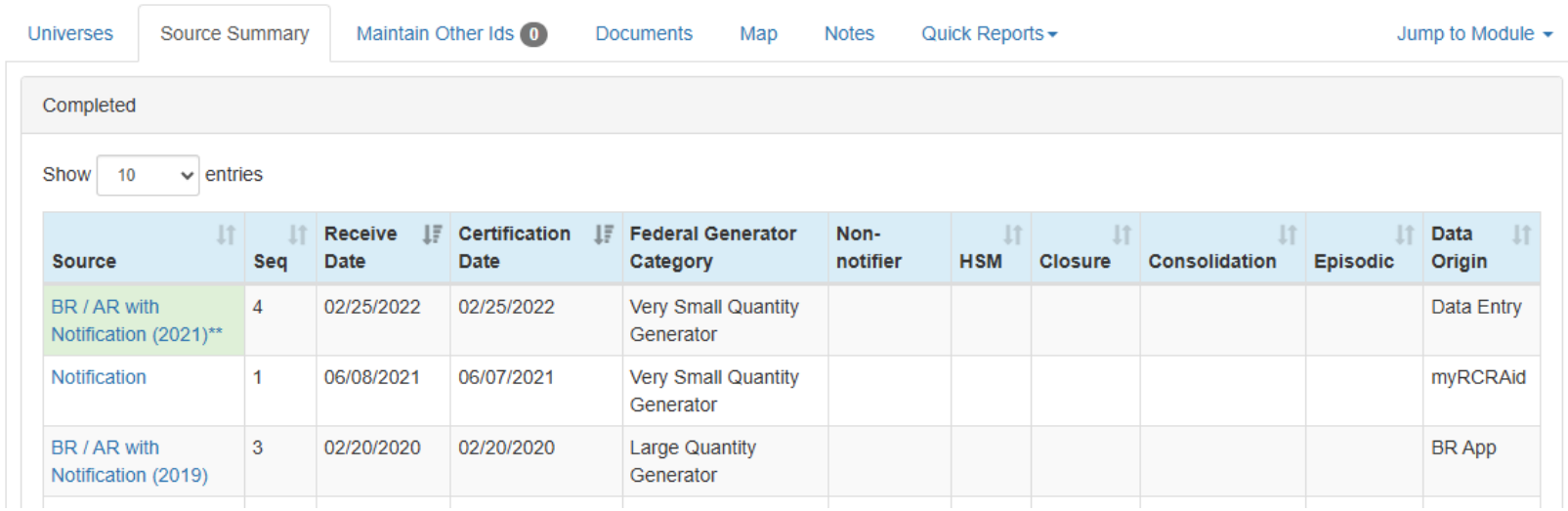
RCRAInfo

The RCRAInfo system enables cradle-to-grave waste tracking of many types of information regarding the regulated universe of RCRA hazardous waste handlers. RCRAInfo characterizes facility status, regulated activities, and compliance histories in addition to capturing detailed data on the generation of hazardous waste from large quantity generators and on-site waste management practices from treatment, storage, and disposal facilities.

Handler Module

- Stores data related to each handler –
  - Generators
  - Transporters
  - TSDFs
  - Used Oil Processors
- Various reports/functionality in handler module –
  - Episodic Generation
  - SQG Re-Notification
  - LQG Closure for Central Accumulation Area (CAA) and Entire Facility
  - LQG Consolidation of VSQG Waste
  - Hazardous Secondary Materials
  - Subpart P & K
  - Universal Waste
  - Used Oil

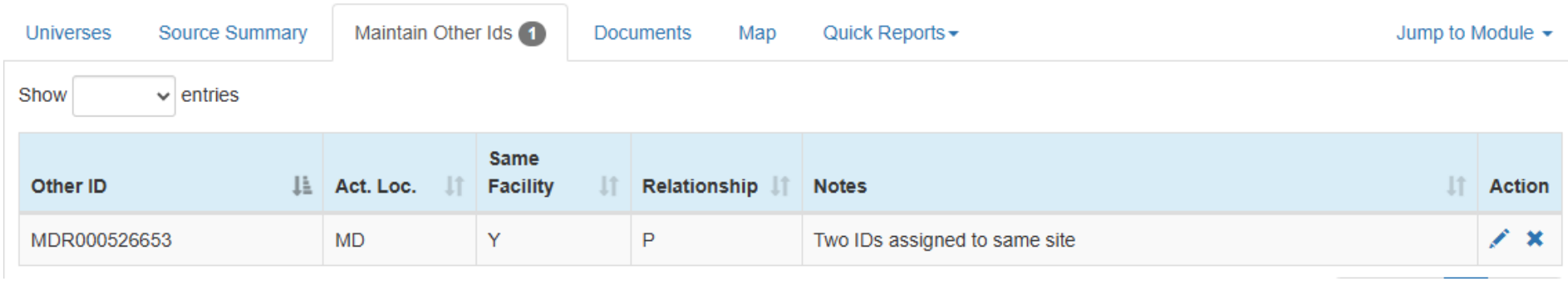
Handler Module – Source Summary Tab



Source	Seq	Receive Date	Certification Date	Federal Generator Category	Non-notifier	HSM	Closure	Consolidation	Episodic	Data Origin
BR / AR with Notification (2021)**	4	02/25/2022	02/25/2022	Very Small Quantity Generator						Data Entry
Notification	1	06/08/2021	06/07/2021	Very Small Quantity Generator						myRCRAid
BR / AR with Notification (2019)	3	02/20/2020	02/20/2020	Large Quantity Generator						BR App

- Source:
  - I (Implementer)
  - N (Notification)
  - B (Biennial/Annual Report with Notification)
  - T (Temporary)
  - E (Emergency)
- Sequence
- Received Date
- Certification Date
- Federal Generator Category
- Non-Notifier
- HSM (only if your State has opted in
- Closure
- Consolidation
- Episodic
- Date Origin

Handler Module –Maintain Other Ids Tab



- Other ID
- Act. Loc
- Same Facility
- Relationship
- Notes
- Action

Handler Module Continue

- Other Tabs
  - Documents
    - New Feature Where Regulatory Users Can Upload Corresponding Handler Documents such as Hard Copy 8700-12
  - Map
  - Quick Report
    - 4 Different Reports Regarding the EPA ID Number

Note: There is a "Jump to Module" drop down. You can jump to other modules i.e. e-Manifest.

Compliance, Monitoring, and Enforcement (CME) Module

- Stores all data related to
  - Inspections
  - Enforcement
- Can see types of
  - Evaluations
  - Violations
  - Enforcements

Compliance, Monitoring, and Enforcement (CME) Module - Evaluations Tab

- Evaluation History
- Date of Evaluations
- Agency of Evaluation (B, E, S, or T)
- Type of Evaluation
- Responsible Person Who Conducted Evaluation
- Number of Violations Cited During Evaluation

Compliance, Monitoring, and Enforcement (CME) Module – Violations Tab

Universes | Evaluations | Violations 0 | Citations | Enforcements | 3007 Info Requests | Documents | Map | Quick Reports | Jump to Module

Violations

Show 10 entries Search:

Seq	Act Loc	Type - Description	Linked Citations	Resp Agcy	Det by Agcy	Det Date	Latest Sched Date	Actual RTC Date	Qualifier	Evals	Enfs	Action
1	OH	262.A	52-12(A)	S	S	07/25/2012		08/02/2012	D	1	1	
2	OH	268.A	270-07(A) (8)	S	S	07/25/2012		08/17/2012	D	1	1	

Showing 1 to 2 of 2 entries Previous 1 Next

- Violation History
- Linked Citations
- Responsible Agency (B, E, S, or T)
- Violation Determined Date
- Return to Compliance (RTC) Date
- RTC Qualifier (D, N, O, or U)
- Linked Evaluations and Enforcements

Compliance, Monitoring, and Enforcement (CME) Module –Enforcement Tab

- Enforcement History
- Date of Enforcement
- Agency of Enforcement (B, E, S, or T)
- Type of Enforcement (Over 40 Types)
- Responsible Person Who Issued Enforcement
- Linked Violations

Compliance, Monitoring, and Enforcement (CME) Module Continued

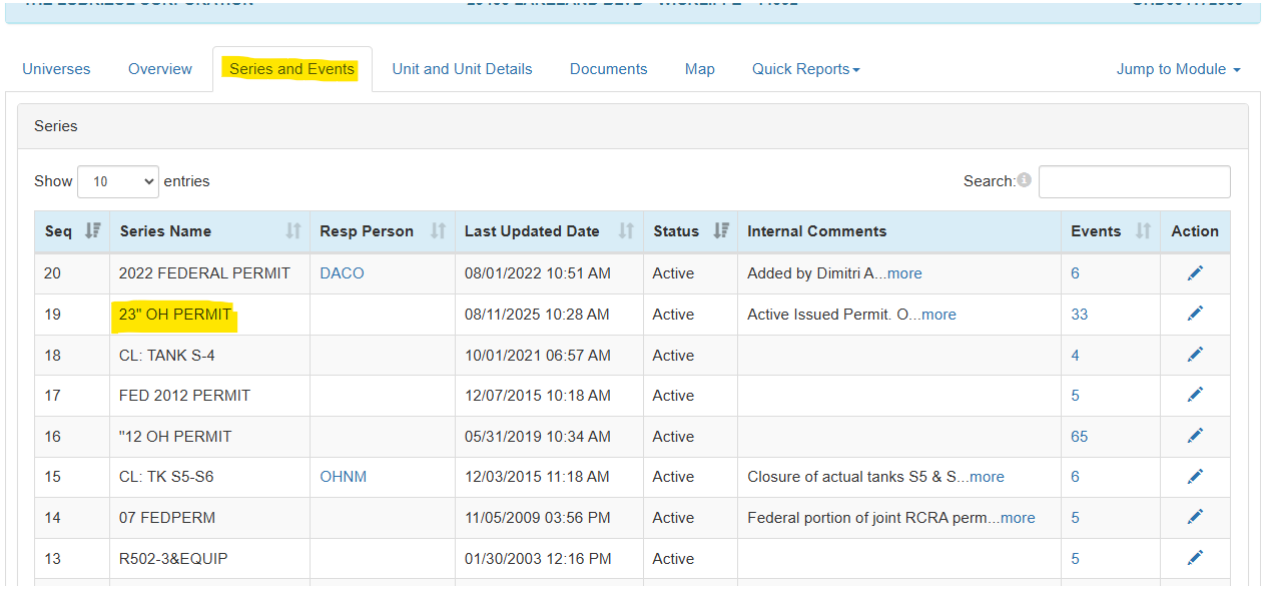
- Other Tabs
  - Citations
    - Shows Similar Information Outlined in Violations Tab but at a Citation Level
  - 3007 Requests
    - If State or U.S. EPA Formally Requests Information Directly from Facility
  - Documents
    - New Feature Where Regulatory Users Can Upload Corresponding CME Documents such as Enforcements
  - Map
  - Quick Report
    - 5 Different Reports Using Handler and CME Data

Permitting Module

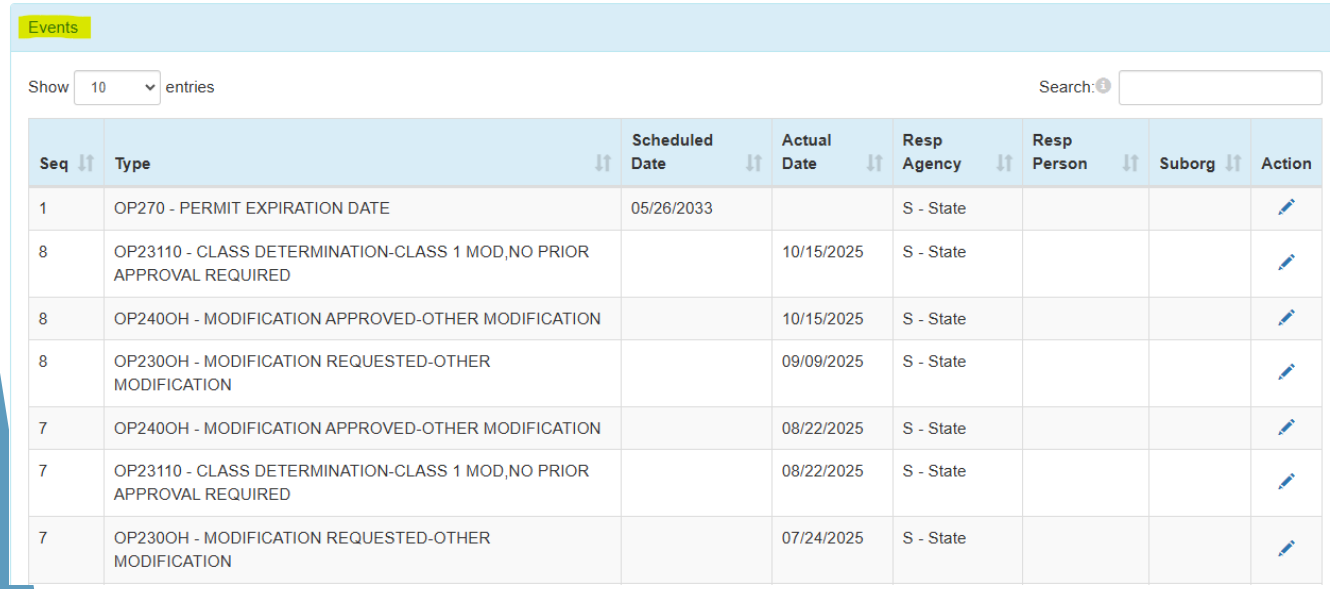
- Stores all data related to permitted facilities

- Can see types of
  - Permitted Units
  - Unit Capacities
  - Types of Waste Handled
  - Permit Issuances
  - Permit Expirations
  - Modifications (Class 1, 2, and 3)

Permitting Module Continued



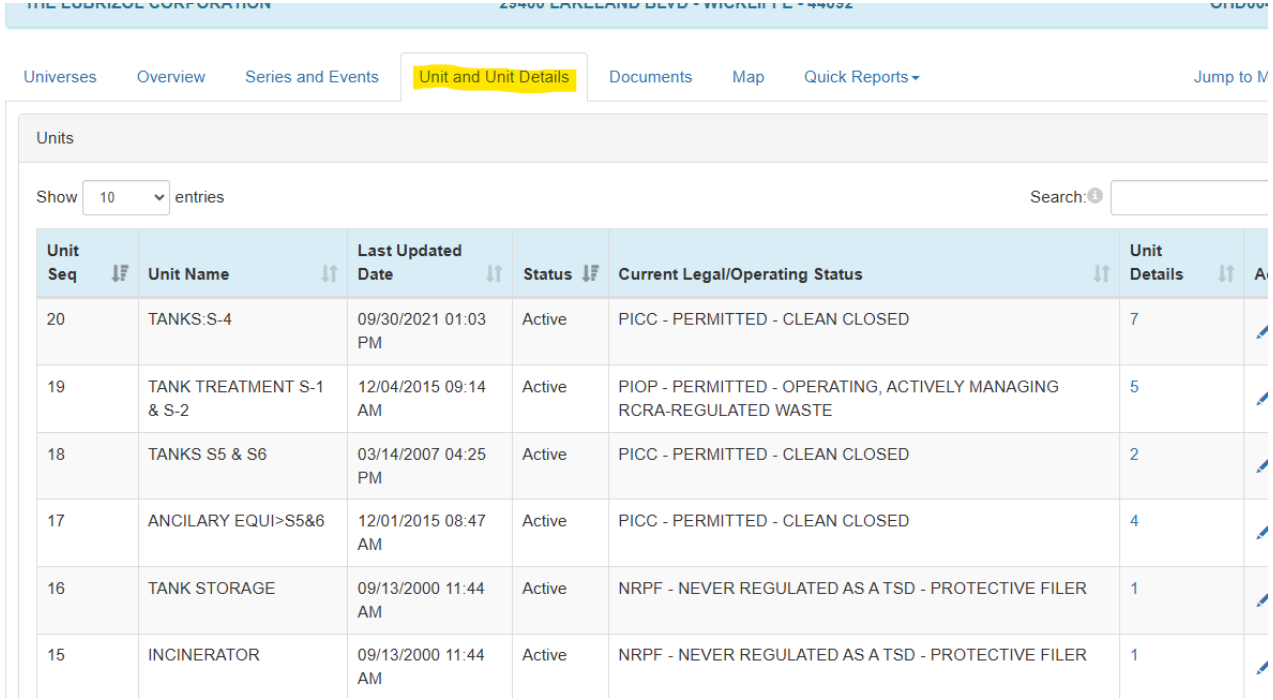
Seq	Series Name	Resp Person	Last Updated Date	Status	Internal Comments	Events	Action
20	2022 FEDERAL PERMIT	DACO	08/01/2022 10:51 AM	Active	Added by Dimitri A...more	6	
19	23" OH PERMIT		08/11/2025 10:28 AM	Active	Active Issued Permit. O...more	33	
18	CL: TANK S-4		10/01/2021 06:57 AM	Active		4	
17	FED 2012 PERMIT		12/07/2015 10:18 AM	Active		5	
16	"12 OH PERMIT		05/31/2019 10:34 AM	Active		65	
15	CL: TK S5-S6	OHNM	12/03/2015 11:18 AM	Active	Closure of actual tanks S5 & S...more	6	
14	07 FEDPERM		11/05/2009 03:56 PM	Active	Federal portion of joint RCRA perm...more	5	
13	R502-3&EQUIP		01/30/2003 12:16 PM	Active		5	



Seq	Type	Scheduled Date	Actual Date	Resp Agency	Resp Person	Suborg	Action
1	OP270 - PERMIT EXPIRATION DATE	05/26/2033		S - State			
8	OP23110 - CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED		10/15/2025	S - State			
8	OP240OH - MODIFICATION APPROVED-OTHER MODIFICATION		10/15/2025	S - State			
8	OP230OH - MODIFICATION REQUESTED-OTHER MODIFICATION		09/09/2025	S - State			
7	OP240OH - MODIFICATION APPROVED-OTHER MODIFICATION		08/22/2025	S - State			
7	OP23110 - CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED		08/22/2025	S - State			
7	OP230OH - MODIFICATION REQUESTED-OTHER MODIFICATION		07/24/2025	S - State			

- Series and Events Tab
  - Lists Active and Historical Series Along with Corresponding Events
  - Series = Permit, Closure Plan, Post Closure Plan, Etc.
  - Click on Event Number of a Series to See Events Associated with that Series

Permitting Module Continued



Unit Seq	Unit Name	Last Updated Date	Status	Current Legal/Operating Status	Unit Details
20	TANKS:S-4	09/30/2021 01:03 PM	Active	PICC - PERMITTED - CLEAN CLOSED	7
19	TANK TREATMENT S-1 & S-2	12/04/2015 09:14 AM	Active	PIOP - PERMITTED - OPERATING, ACTIVELY MANAGING RCRA-REGULATED WASTE	5
18	TANKS S5 & S6	03/14/2007 04:25 PM	Active	PICC - PERMITTED - CLEAN CLOSED	2
17	ANCILARY EQUI>S5&6	12/01/2015 08:47 AM	Active	PICC - PERMITTED - CLEAN CLOSED	4
16	TANK STORAGE	09/13/2000 11:44 AM	Active	NRPF - NEVER REGULATED AS A TSD - PROTECTIVE FILER	1
15	INCINERATOR	09/13/2000 11:44 AM	Active	NRPF - NEVER REGULATED AS A TSD - PROTECTIVE FILER	1

- Unit and Unit Details Tab
  - Displays Active and Inactive Units Associated with Any Series
  - Displays Last Known Legal/ Operating Status
  - Displays How Many Different Unit Details Each Unit Has
    - How Many Times Each Unit Has Changed in Some Way, Shape, or Form

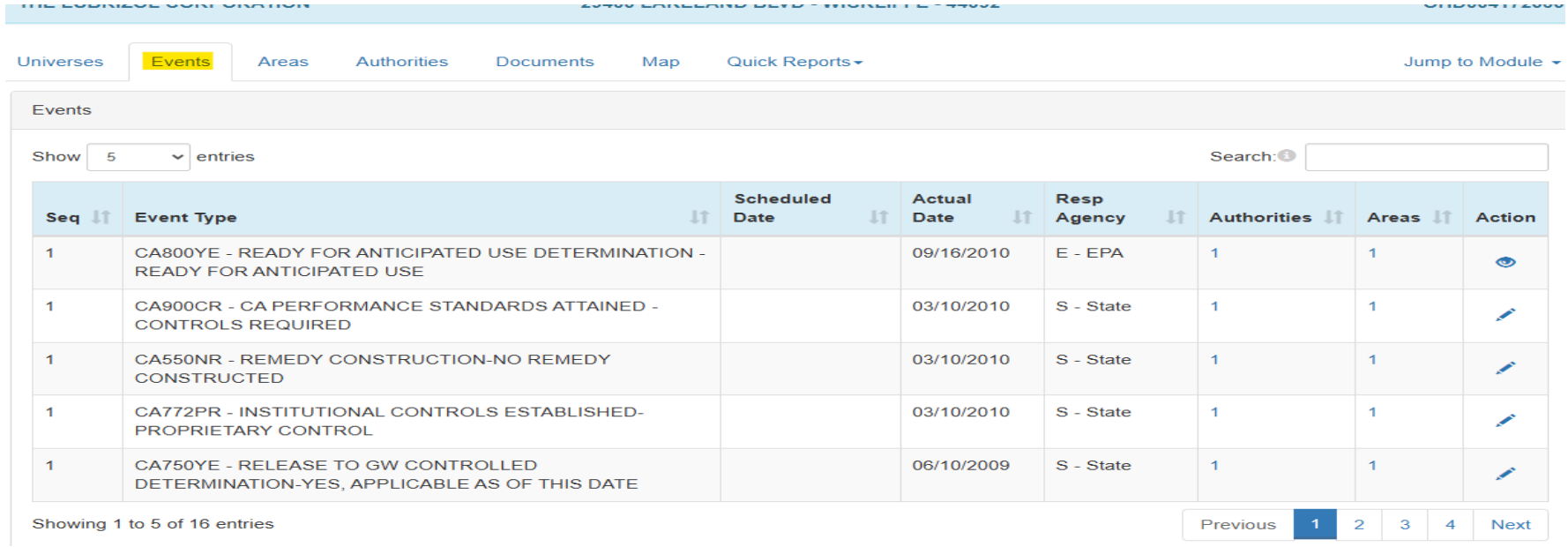
- Other Tabs
  - Documents
    - New Feature Where Regulatory Users Can Upload Corresponding Permitting Documents such as Permits, Closure Plan Approval, Modifications, Etc.
  - Map
  - Quick Report
    - 3 Different Reports Using Comprehensive and Event Permitting Data

Corrective Action Module

- Stores all data related to Corrective Action activities

- All corrective action events are tracked –
  - Investigations
  - Remedy Decisions
  - Corrective Measures
  - Institutional Controls
  - Long-term Stewardship Inspections

Corrective Action (CA) Module Continued



Universes | Events | Areas | Authorities | Documents | Map | Quick Reports | Jump to Module

Events

Show 5 entries Search:

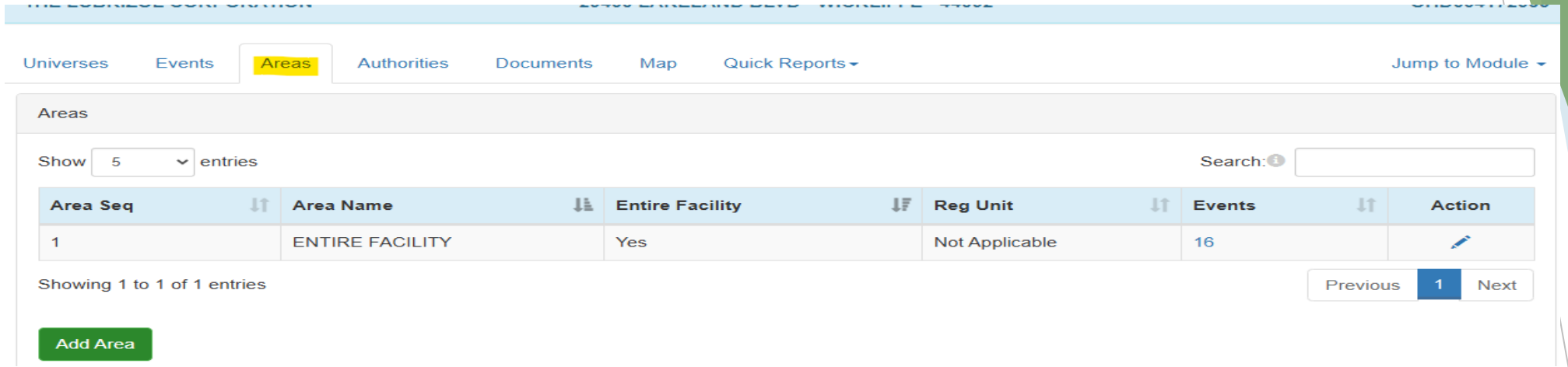
Seq	Event Type	Scheduled Date	Actual Date	Resp Agency	Authorities	Areas	Action
1	CA800YE - READY FOR ANTICIPATED USE DETERMINATION - READY FOR ANTICIPATED USE		09/16/2010	E - EPA	1	1	
1	CA900CR - CA PERFORMANCE STANDARDS ATTAINED - CONTROLS REQUIRED		03/10/2010	S - State	1	1	
1	CA550NR - REMEDY CONSTRUCTION-NO REMEDY CONSTRUCTED		03/10/2010	S - State	1	1	
1	CA772PR - INSTITUTIONAL CONTROLS ESTABLISHED-PROPRIETARY CONTROL		03/10/2010	S - State	1	1	
1	CA750YE - RELEASE TO GW CONTROLLED DETERMINATION-YES, APPLICABLE AS OF THIS DATE		06/10/2009	S - State	1	1	

Showing 1 to 5 of 16 entries

Previous 1 2 3 4 Next

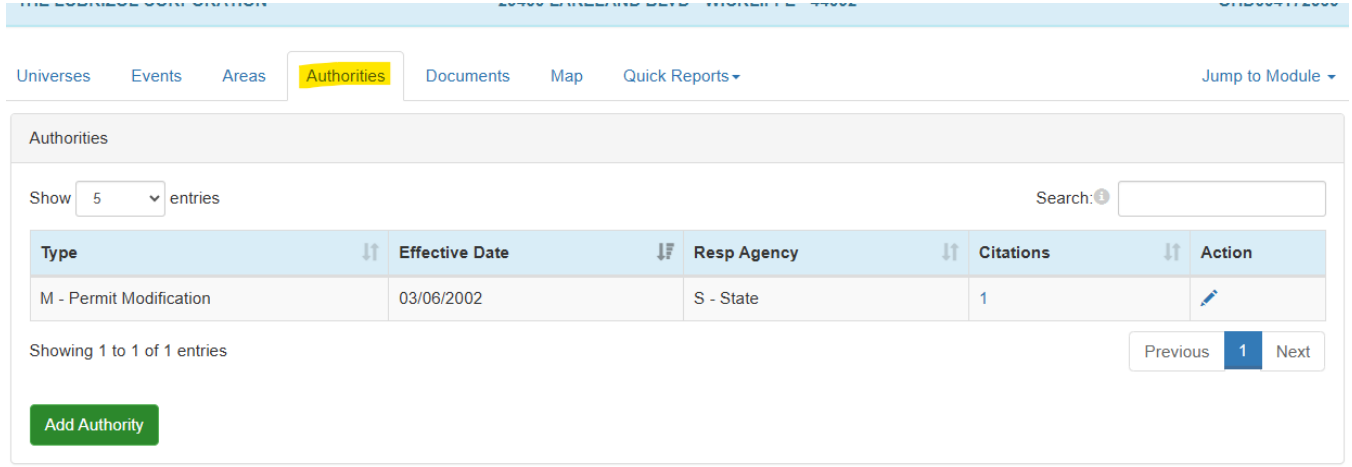
- Events Tab
  - Event Type
  - Date of Event Occurrence
  - Responsible Agency for Event
  - Linked Authorities
  - Linked Areas

Corrective Action (CA) Module Continued



- Areas Tab
  - Name of Area(s) Subject to CA
  - Designation of Entire Site or Unit Specific
  - Designation of Whether or Not Area is a Regulated TSD Unit
  - Linked Events

Corrective Action (CA) Module Continued

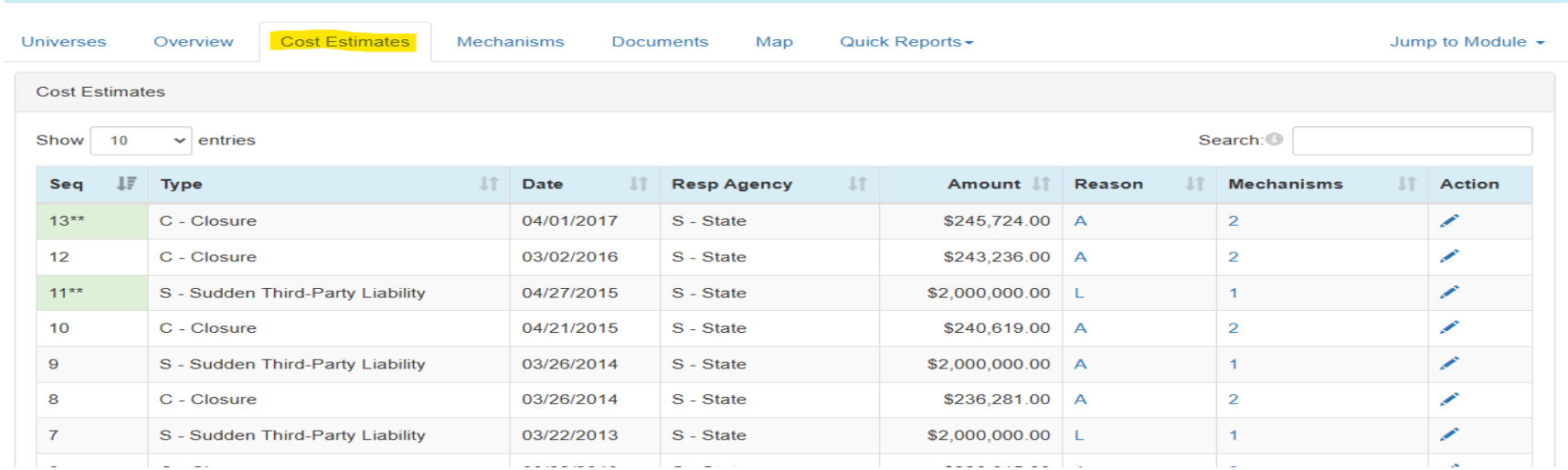


- Authorities Tab
  - Type of Authority for CA Requirements
  - Date Authority was Established
  - Responsible Agency
  - Linked Citation for CA Requirements
- Other Tabs
  - Documents
    - New Feature Where Regulatory Users Can Upload Corresponding CA Documents such as Control and Approval Documents
  - Map
  - Quick Report
    - 3 Different Reports Using Comprehensive and Event Corrective Action Data

Financial Assurance Module

- Stores all data related to Financial Assurance
- Data related to the type of -
  - FA Required
    - Closure
    - Post-closure
    - Corrective action
  - Mechanism Used
  - Amount of FA for Each Facility
- RCRAInfo conducts automated validation to confirm that the financial assurance (FA) mechanism sufficiently meets the required FA obligations, thereby promoting accuracy in data entry.

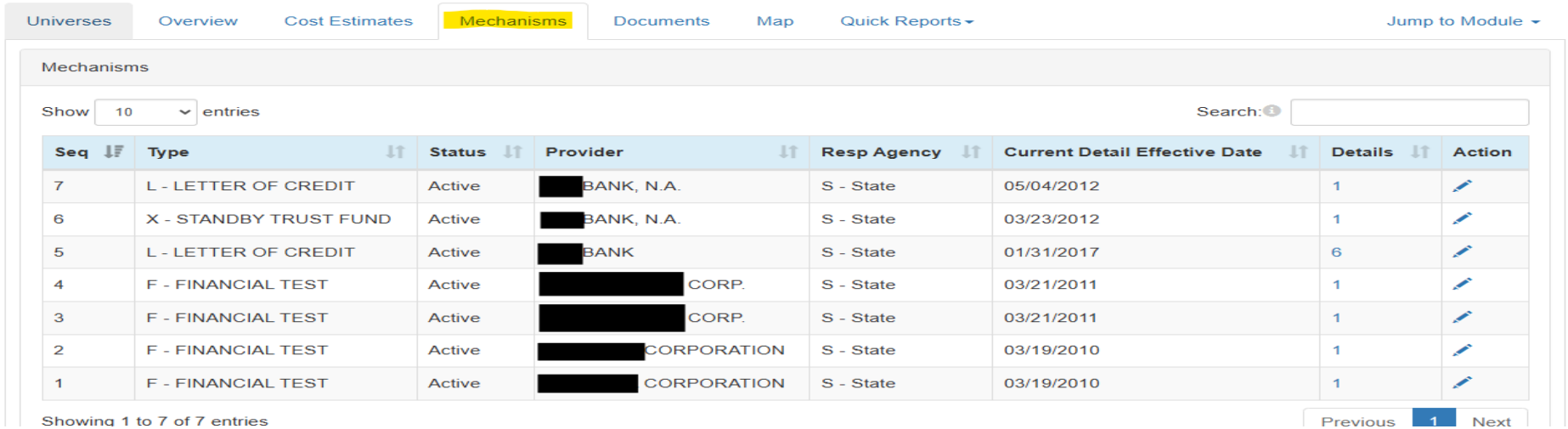
Financial Assurance (FA) Module Continued



Seq	Type	Date	Resp Agency	Amount	Reason	Mechanisms	Action
13**	C - Closure	04/01/2017	S - State	$245,724.00	A	2	
12	C - Closure	03/02/2016	S - State	$243,236.00	A	2	
11**	S - Sudden Third-Party Liability	04/27/2015	S - State	$2,000,000.00	L	1	
10	C - Closure	04/21/2015	S - State	$240,619.00	A	2	
9	S - Sudden Third-Party Liability	03/26/2014	S - State	$2,000,000.00	A	1	
8	C - Closure	03/26/2014	S - State	$236,281.00	A	2	
7	S - Sudden Third-Party Liability	03/22/2013	S - State	$2,000,000.00	L	1	

- Cost Estimates Tab
  - Type of Cost Estimate
  - Date of Estimate
  - Responsible Agency
  - Monetary Amount of FA
  - Reason for FA
  - Linked Mechanism(s)

Financial Assurance (FA) Module Continued

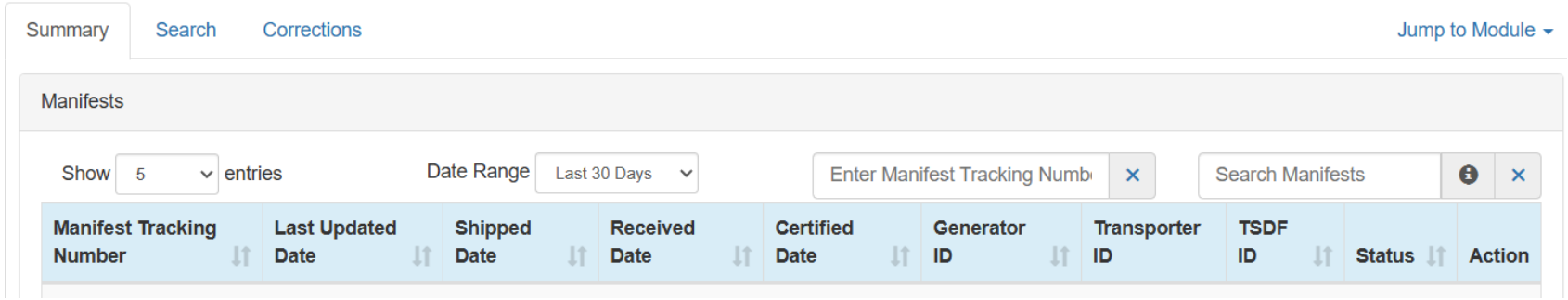


- Mechanisms Tab
  - Type of Mechanism
  - Active Status
  - Provider of Mechanism
  - Responsible Agency
  - Current Detail Effective Date
  - Linked Mechanism Details Including Total Face Value and Cost Estimates

e-Manifest Module

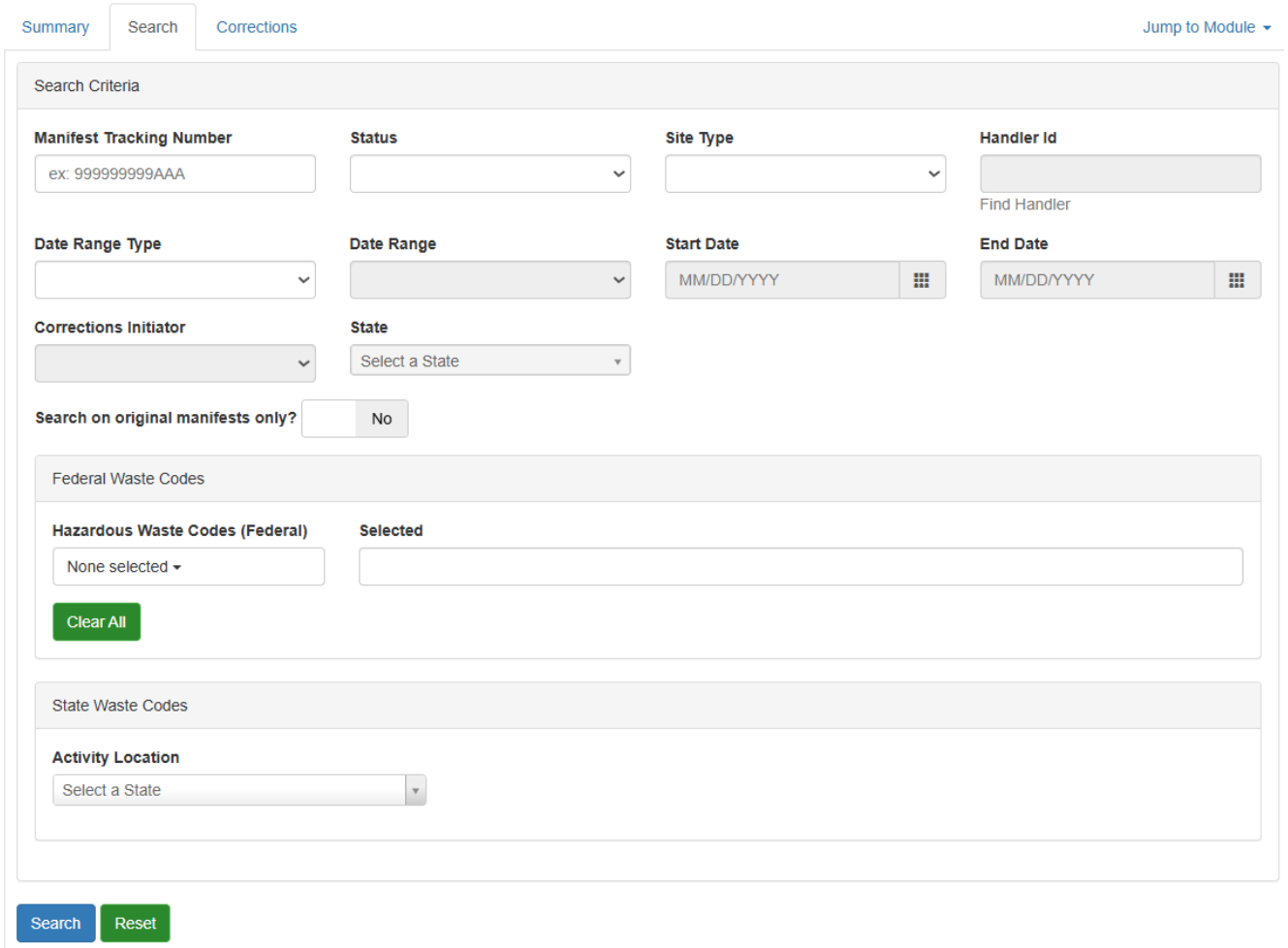
- All manifests that have been uploaded are able to be seen
- Required to be uploaded within 30 days of acceptance at TSDF
- Correction requests
- VSQG manifests not required to be uploaded

e-Manifest Module Continued



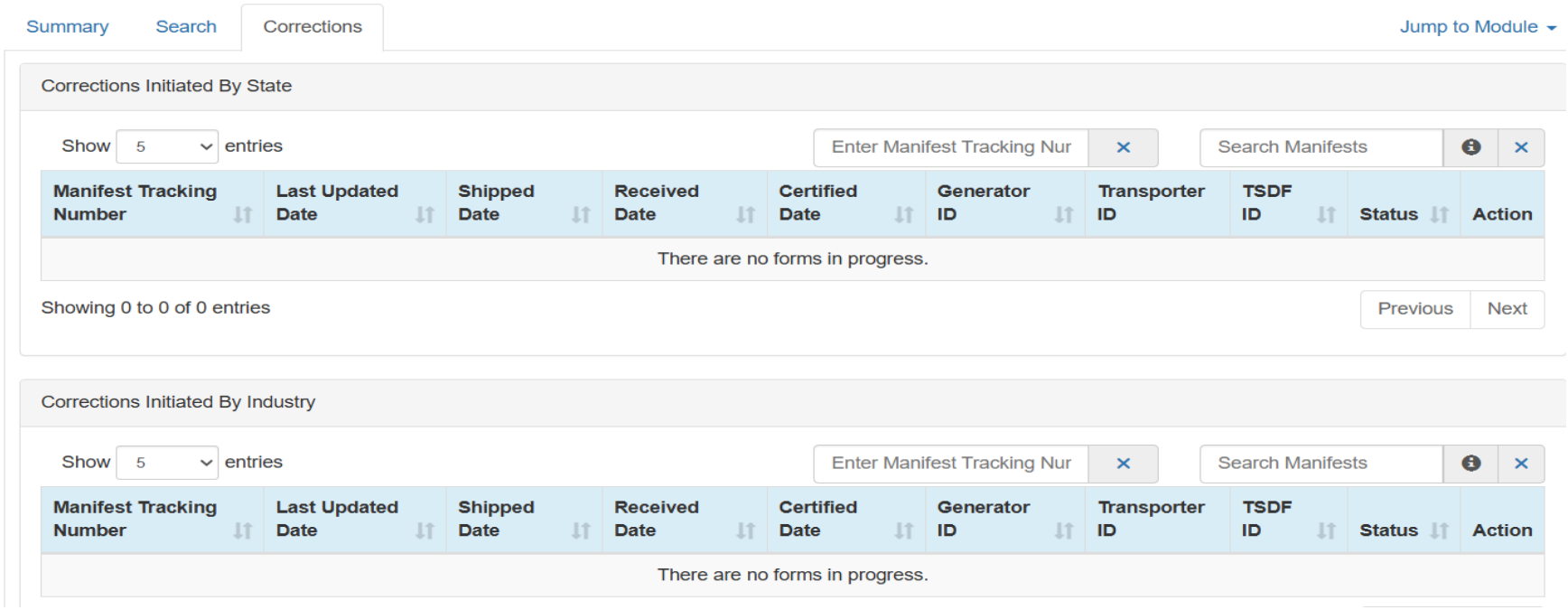
- Search by: Date Range, Manifest Tracking Number, or Other Information
- Manifest Tracking Number
- Last Updated Date
- Shipped Date
- Received Date
- Generator ID
- Transporter ID
- TSDF ID
- Status
- Action

e-Manifest Module Continued



- Search Tab
  - Search Criteria
    - Manifest Tracking Number
    - Status
    - Site Type
    - Date Range Type
    - Corrections Initiator
  - Federal Waste Codes
  - State Waste Codes

e-Manifest Module Continued



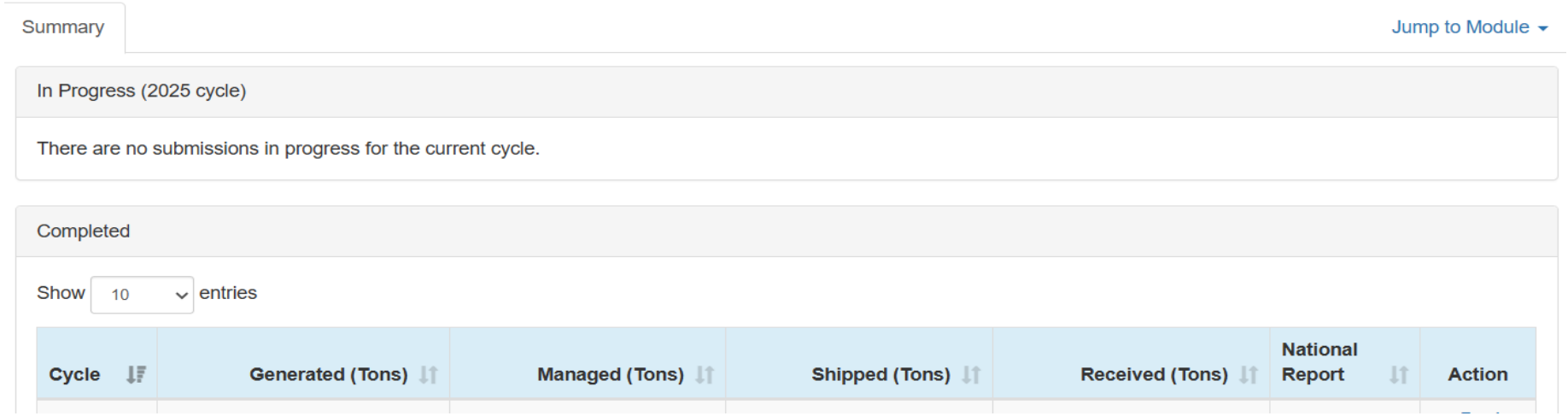
- Corrections Tab
  - Corrections Initiated by State
  - Corrections Initiated by Industry (Generator, Transporter or TSD)

Biennial and Annual Report Modules

- Users can submit Biennial and Annual Reports directly through the RCRAInfo industry application if your state has opted into these modules

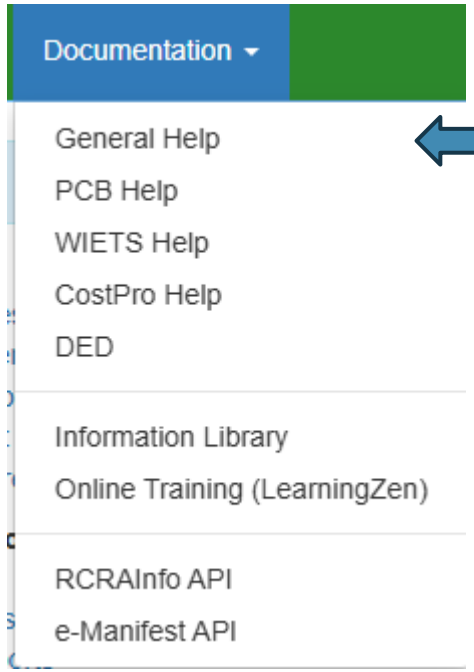
- State regulatory user can view previously submitted reports

Biennial/Annual Report Modules Continued



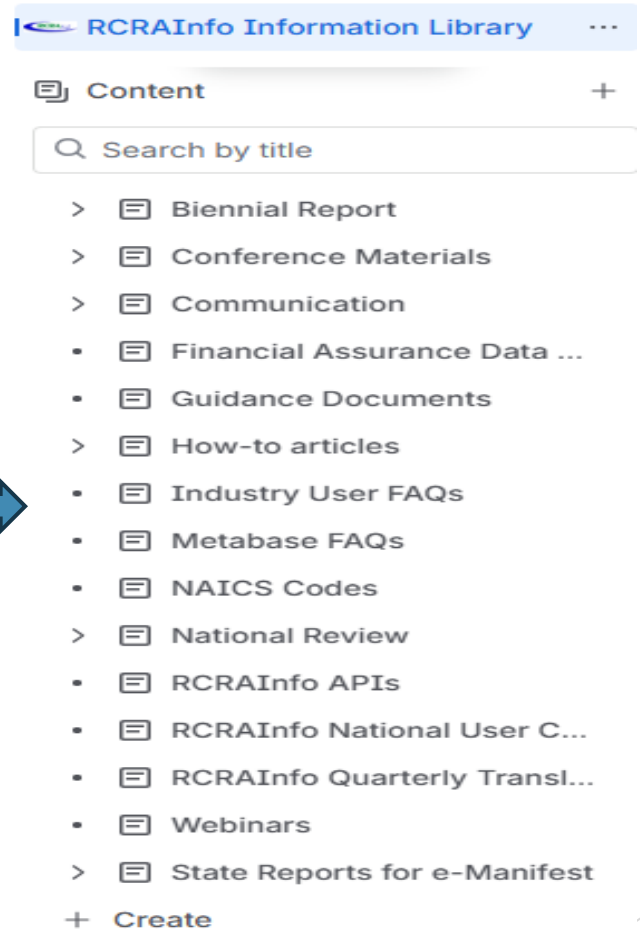
- In Progress
  - Shows if a report is in progress
  - Note: Biennial Reports are every two years (based on odd calendar year activity and submitted during even calendar year)
- Completed
  - Shows summary of past submitted reports

Additional Help – Documentation



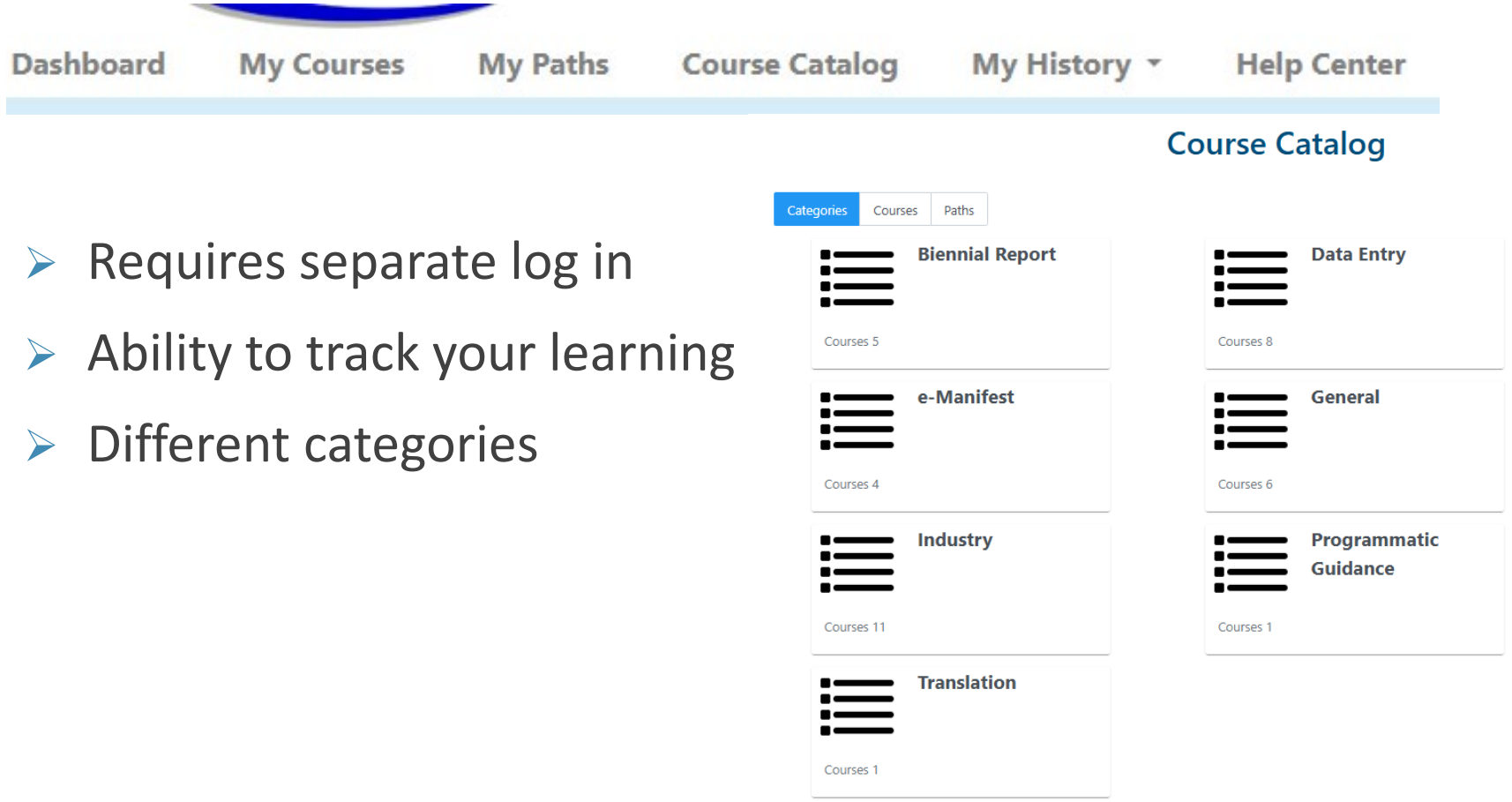
Different Help Documents – includes a glossary of terms, various guidance documents, and other relevant material

RCRAInfo Information Library – repository of information associated with RCRAInfo, minutes of National call, webinars, etc.



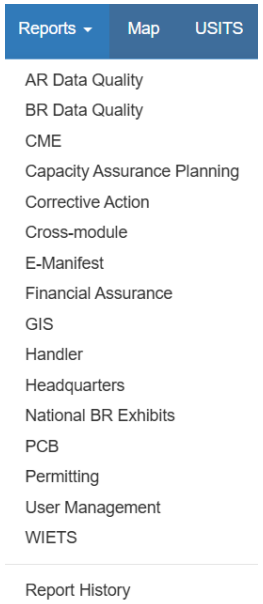
RCRAInfo Learning Zen

- Requires separate log in
- Ability to track your learning
- Different categories



Reports - RCRAInfo

- RCRAInfo
  - Reports are produced in PDF format
  - Each module has their own set of reports
  - Some reports are available in Metabase
    - Click on the action button – will display discretion of report
    - If the report is available in Metabase it will provide a link

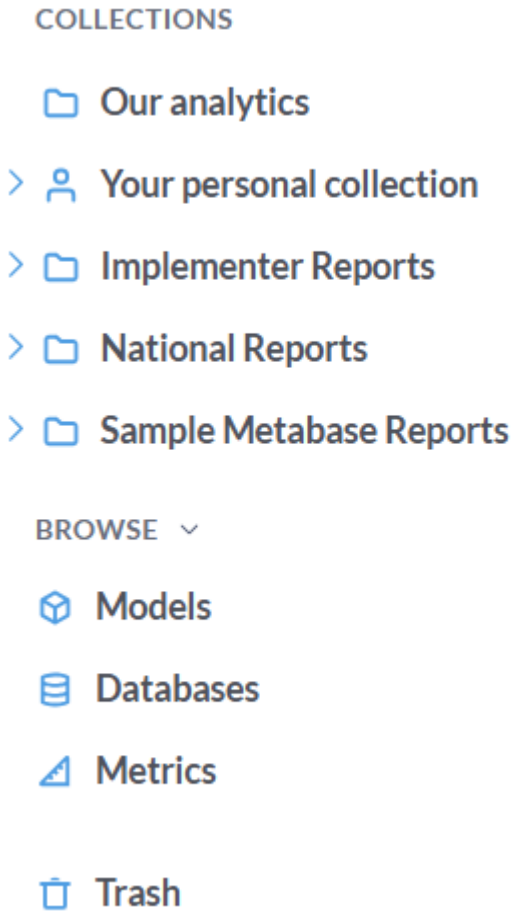


General Handler Reports

Name	Type	Description	Action
Active Short-term, Emergency, and Temporary Handlers Tickler Report	HQ	This report shows handlers that received an EPA ID for either an emergency or short-term situation but are still active.	

View Sample Report (in PDF format). Click here to retrieve the data in CSV format via Metabase.

Reports - Metabase



- Metabase
  - Requires a separate log in
  - Reports can be exported in .cvs, .xlsx or .json
  - Personal collections
    - Reports saved or created by you
  - Implementer Reports
    - Reports created by other States
    - Can save to your personal collection
    - Create your own report to share with other States
  - National Reports
    - Reports created by US EPA

Enforcement and Compliance History Online (ECHO)

- Public
- Regulators can access additional information but requires a login separate from your RCRAInfo login
  - RCRA Integrated Targeting Assistance (RITA) Dashboard
- Search for facilities in your community to access their compliance with environmental regulations
- Use ECHO to:
  - Search for Facilities
  - Investigate Pollution Sources
  - Search for EPA Enforcement Cases
  - Examine and Create Enforcement-Related Maps
  - Analyze Trends in Compliance & Enforcement Data

Hazardous Waste Information Platform (HWIP)

- Public
- Data repository for nationwide hazardous waste generation, management, and transportation
- Information provided is pulled from RCRAInfo
- The HWIP can be used to generate reports, download data for analysis, or view hazardous waste sites online
- Forms and resources

Participation Opportunities in ASTSWMO

If you are interested in becoming a member of a Task Force within the ASTSWMO Hazardous Waste Subcommittee, or a member of a group within another Subcommittee, please visit the following ASTSWMO webpage for more information and the application form:

Get Involved and Become an Active Member

The End.

Thank You!
Please respond to the Feedback Survey.