



At a Glance

Catalyst for Improving the Environment

Why We Did This Review

This review was conducted to evaluate the effectiveness of the U.S. Environmental Protection Agency's (EPA's) (1) efforts to address the regulation of hazardous waste units granted interim status under the Resource Conservation and Recovery Act (RCRA), and (2) information management system (RCRAInfo) in tracking permit information for interim status units.

Background

Under Subtitle C of RCRA, hazardous waste facility units that perform treatment, storage, and disposal activities must receive permits prior to operation. When new hazardous waste statutes or regulations are implemented, units that already exist may continue operating in a condition known as interim status by notifying EPA of their intent and supplying basic information. Units may remain in interim status until issuance or denial of a permit.

For further information, contact our Office of Congressional and Public Liaison at (202) 566-2391.

To view the full report, click on the following link:
www.epa.gov/oig/reports/2007/20061204-2007-P-00005.pdf

EPA's Management of Interim Status Permitting Needs Improvement to Ensure Continued Progress

What We Found

Interim status is a temporary designation, but some units have existed for as many as 25 years without formal issuance or denial of a permit, or other regulatory controls. Under the Government Performance and Results Act (GPRA), EPA has a RCRA National Permitting Goal to ensure that all units at hazardous waste facilities have "controls in place." EPA includes interim status units in this goal, and the Agency's data indicate that it has made progress in ensuring controls are in place at interim status units. As of 2005, EPA had attained the "controls in place" designation for 89 percent of RCRA hazardous waste facilities.

However, EPA's continued progress may be compromised because (1) the Agency has not sufficiently documented some changes to the baseline it uses to measure progress; (2) EPA does not prioritize its National Permitting Goal activities according to the potential risks posed by hazardous waste facilities or units, including the amount of time a unit may have been operating without required controls; (3) EPA does not monitor the creation of "new" interim status units in its reporting and tracking system (RCRAInfo); and (4) RCRAInfo lacks other system controls to protect data integrity and data quality, which may lead to the loss of historical information needed to track permit status. Despite data quality problems, RCRAInfo data are available for public use without appropriate disclaimers.

What We Recommend

In order to ensure valid progress in achieving "controls in place" at interim status units, we recommend that the Assistant Administrator for Solid Waste and Emergency Response:

- Implement a process to document changes to the GPRA National Permitting Goal baseline.
- Review State GPRA National Permitting Goal projections for 2008 and 2011 to identify opportunities for prioritizing facilities based on risk, including time in interim status.
- Oversee the designation of "new" interim status units in RCRAInfo.
- Implement RCRAInfo system controls to ensure data integrity and improve data quality.
- Provide a disclaimer on data released publicly from RCRAInfo until data quality controls are in place.

The Agency generally concurred with our recommendations.