

**Evaluation Crosswalk**

Version 2 Codes			Version 3 Codes		
Description	Name	Type	Type	Name	Description
When corrective action on-site inspection is conducted as part of another inspection type (CEI, CME, etc.), a separate Handler Evaluation form should be submitted reporting the CAO component.	<b>Corrective Action On-Site Inspection</b>	<b>CAO</b>	<b>CAC</b>	<b>Corrective Action Compliance Evaluation (Revised Title and Definition)</b>	An evaluation of a site's compliance with the corrective action requirements of a permit or an order. When a CAC is conducted as part of another inspection type (CEI, GME, etc.), a separate entry for a CAC should be made in RCRAInfo for the CAC component.
The compliance assistance activities that a region or state conducts to assist handlers in achieving compliance as outlined in the OECA Operating Principles.	<b>Compliance Assistance Activity</b>	<b>CAV</b>	<b>CAV</b>	<b>Compliance Assistance Visit (Revised Definition)</b>	The compliance assistance activity that a region or state conducts at a specific site to assist the site in achieving compliance as outlined in the OECA Operating Principles ( <a href="http://www.epa.gov/compliance/resources/policies/planning/state/oprin-integ-mem.pdf">URL:http://www.epa.gov/compliance/resources/policies/planning/state/oprin-integ-mem.pdf</a> ). A CAV evaluation does not include evaluation events that would otherwise qualify as another type of evaluation such as a CEI or OAM evaluation or conducted under the auspices of a confidentiality agreement via a small business or local government assistance program (sometimes referred to as an amnesty program). However, this CAV activity code would include technical site-specific compliance assistance not considered solely "interpretive technical assistance." CAVs are conducted without the threat of enforcement. Therefore, CAVs should not be linked to violations or enforcement actions.
A CDI may involve sampling to confirm the chemical composition/characteristics of wastes handled by generators and transporters, and their waste handling practices. In addition, facility operations and design information may be reviewed, and manifests from generators and transporters verified. A focused CDI may be conducted when a CEI reveals possible RCRA violations, and could serve to gather the additional data needed to support an enforcement case.	<b>Case Development Inspection</b>	<b>CDI</b>	<b>CDI</b>	<b>Case Developments Inspection (Revised Definition)</b>	A CDI evaluation is an on-site inspection conducted for the sole purpose of gathering additional information that supports the evidence (i.e., samples, on-site record review, interview, etc.) for a potential or pending enforcement case. A CDI is performed only after an initial evaluation has resulted in the observation of potential violations.
			<b>FCI</b>	<b>Focused Compliance Inspection with Multimedia Indicator Checkbox and/or Focus Area, when applicable (new Code and Definition)</b>	An FCI is an on-site inspection that addresses only a specific portion or Subpart of the RCRA regulations or authorized State regulations/programs. Some examples of an FCI are a Subpart CC inspection, BIF inspection, Universal Waste Rule inspection, closure verification inspection, training inspections, etc. Nationally defined Focus Areas may be used with this evaluation type to further define the specific scope of the FCI.

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<p>Is primarily an on-site evaluation of the compliance status of the handler with regard to all applicable RCRA Regulations and Permits. Although portions of a CEI evaluation may routinely be conducted in an agency office setting, such "office" evaluations are considered as integral parts of the CEI in terms of the evaluation completion date. The major function of the CEI is overall review of the Handler's performance. All treatment, storage, and disposal facilities receive this type of inspection either annually or biannually. The inspection includes an on-site examination of records and other documents maintained by the handler and an evaluation of the handler's compliance with all applicable requirements and adequate sampling (use CES for CEIs without adequate sampling). Where appropriate, it includes groundwater monitoring assessment outlines or plans, closure/post-closure plans, contingency plan reviews, waste analysis plan reviews, and preparedness and prevention plan reviews. Specifically excluded from the CEI type of evaluation are Financial Record Reviews. This review is most often conducted by "agency experts", and appropriately coded as Financial Record Review (FRR) type of evaluation.</p>	<p><b>Compliance Evaluation Inspection</b></p>	<p><b>CEI</b></p>	<p><b>CEI</b></p>	<p><b>Compliance Evaluation Inspection with Multimedia or Sampling Indicator Checkbox, when applicable (Revised Definition)</b></p>	<p>A CEI evaluation is primarily an on-site evaluation of the compliance status of the site with regard to all applicable RCRA Regulations and Permits (with the exception of groundwater monitoring and financial assurance requirements). Although portions of a CEI evaluation may routinely be conducted in an agency office setting, such "office" evaluations are considered an integral part of a CEI in terms of completing an evaluation. The overall evaluation of a site's compliance status may take place over multiple days necessitating multiple site visits and activities. The entire set of activities and associated effort is considered a single CEI. The major function of a CEI is an overall review of the site's performance. The inspection includes an on-site examination of records and other documents maintained by the site and an evaluation of the site's compliance with all applicable requirements and adequate sampling, when necessary. Where appropriate, it includes groundwater monitoring assessment outlines or plans, closure/post-closure plans, contingency plan reviews, waste analysis plan reviews, and preparedness and prevention plan reviews. Specifically excluded from the CEI type of evaluation are financial assurance requirements and inspections of groundwater monitoring systems. A review of financial assurance requirements is most often conducted by "agency experts", and appropriately coded as a Financial Record Review (FRR) evaluation. Inspections of groundwater monitoring systems are coded as either a GME or OAM.</p>

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The CES type of evaluation indicates that the CEI was conducted without sampling. (Used by implementers who conduct CEIs through two separate site visits; one to do sampling and the other to complete the remainder of the CEI i.e., CEI = CES + SPL.)	<b>Compliance Evaluation Inspection Without Sampling</b>	<b>CES</b>	<b>CEI</b>	<b>Compliance Evaluation Inspection with Multimedia or Sampling Indicator Checkbox, when applicable (Revised Definition)</b>	A CEI evaluation is primarily an on-site evaluation of the compliance status of the site with regard to all applicable RCRA Regulations and Permits (with the exception of groundwater monitoring and financial assurance requirements). Although portions of a CEI evaluation may routinely be conducted in an agency office setting, such "office" evaluations are considered an integral part of a CEI in terms of completing an evaluation. The overall evaluation of a site's compliance status may take place over multiple days necessitating multiple site visits and activities. The entire set of activities and associated effort is considered a single CEI. The major function of a CEI is an overall review of the site's performance. The inspection includes an on-site examination of records and other documents maintained by the site and an evaluation of the site's compliance with all applicable requirements and adequate sampling, when necessary. Where appropriate, it includes groundwater monitoring assessment outlines or plans, closure/post-closure plans, contingency plan reviews, waste analysis plan reviews, and preparedness and prevention plan reviews. Specifically excluded from the CEI type of evaluation are financial assurance requirements and inspections of groundwater monitoring systems. A review of financial assurance requirements is most often conducted by "agency experts", and appropriately coded as a Financial Record Review (FRR) evaluation. Inspections of groundwater monitoring systems are coded as either a GME or OAM.
A detailed evaluation of the adequacy of the design and operation of a facility's groundwater monitoring system as per EPA's Final RCRA Compliance Groundwater Monitoring Evaluation Guidance Document. Evaluation of the groundwater monitoring system design should be conducted by a hydro geologist and includes the review of the owner/operator's (o/o's) characterization of the hydro geology beneath hazardous waste management units, monitoring well placement and depth/spacing, and well design and construction. It is essential that the CME ensure that the o/o has designed an adequate groundwater monitoring system. In addition, an integral part of the CME is the review of the operation of the groundwater monitoring system through an evaluation of the o/o's sampling and analysis plan and its implementation. CMEs should be scheduled, to the maximum extent possible, to coincide with o/o sampling events to permit the field evaluation of sampling techniques. Inspectors should collect splits or conduct EPA/State sampling as a random check of groundwater	<b>Compliance (Groundwater) Monitoring Evaluation</b>	<b>CME</b>	<b>GME</b>	<b>Groundwater Monitoring Evaluation with Sampling Indicator Checkbox, when applicable (Revised Title and Definition)</b>	A detailed evaluation of the adequacy of the design and operation of a facility's groundwater monitoring system as per EPA's Final RCRA Compliance Groundwater Monitoring Evaluation Guidance Document. Evaluation of the groundwater monitoring system design should be conducted by a hydro geologist and includes the review of the owner/operator's (o/o's) characterization of the hydro geology beneath hazardous waste management units, monitoring well placement and depth/spacing, and well design and construction. It is essential that the CME ensure that the o/o has designed an adequate groundwater monitoring system. In addition, an integral part of the CME is the review of the operation of the groundwater monitoring system through an evaluation of the o/o's sampling and analysis plan and its implementation. CMEs should be scheduled, to the maximum extent possible, to coincide with o/o sampling events to permit the field evaluation of sampling techniques. Inspectors should collect splits or conduct EPA/State sampling as a random check of groundwater quality data at any wells, which may have indicated releases to support enforcement of corrective action.

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quality data at any wells, which may have indicated releases to support enforcement of corrective action.					
The CMS type of evaluation indicates that the CME was conducted without a substantial amount of sampling. (Used by implementers who conduct CMEs through two separate site visits; one to do sampling and the other to complete the rest of the CME; i.e., CME = CMS + SPL.)	<b>Compliance (Groundwater) Monitoring Evaluation Without Sampling</b>	<b>CMS</b>	<b>GME</b>	<b>Groundwater Monitoring Evaluation with Sampling Indicator Checkbox, when applicable (Revised Title and Definition)</b>	A detailed evaluation of the adequacy of the design and operation of a facility's groundwater monitoring system as per EPA's Final RCRA Compliance Groundwater Monitoring Evaluation Guidance Document. Evaluation of the groundwater monitoring system design should be conducted by a hydro geologist and includes the review of the owner/operator's (o/o's) characterization of the hydro geology beneath hazardous waste management units, monitoring well placement and depth/spacing, and well design and construction. It is essential that the CME ensure that the o/o has designed an adequate groundwater monitoring system. In addition, an integral part of the CME is the review of the operation of the groundwater monitoring system through an evaluation of the o/o's sampling and analysis plan and its implementation. CMEs should be scheduled, to the maximum extent possible, to coincide with o/o sampling events to permit the field evaluation of sampling techniques. Inspectors should collect splits or conduct EPA/State sampling as a random check of groundwater quality data at any wells, which may have indicated releases to support enforcement of corrective action.

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An on-site inspection or other re-evaluation conducted to verify compliance with enforcement actions resulting from a previous evaluation, or to review deficiencies noted in previous inspection. It may be a re-review of the adequacy of documents such as closure plans or financial instruments previously found to be absent. A Compliance Schedule Evaluation should only be used if the effort involved, or the extent of areas inspected, are insufficient to qualify as one of the more comprehensive evaluation types listed above.	Compliance Schedule Evaluation	CSE	CSE	Compliance Schedule Evaluation (Revised Definition)	An evaluation conducted to verify compliance with an enforceable compliance schedule associated with a formal enforcement action. When a CSE is conducted as part of another inspection type (CEI, GME, etc.), a separate CSE entry should be made in RCRAInfo for the CSE component.
			FUI	Follow Up Inspection (Revised Definition)	A partial on-site inspection conducted to verify the status of violations cited during a previous evaluation. An FUI code value should only be used if the effort involved, or the extent of areas inspected, are insufficient to qualify as one of the more comprehensive evaluation types. Includes inspections following up to formal/informal actions where no enforceable compliance schedule has been established. Does not include any inspections involving an enforceable compliance schedule associated with a formal enforcement action. When an FUI inspection is conducted as part of another inspection type (CEI, GME, etc.), a separate FUI entry should be made in RCRAInfo for the FUI component. Please note that new violations may be cited as a result of an FUI evaluation, and those new violations would be linked to the FUI.
An extensive detailed review of a handler's compliance with financial responsibility requirements. Financial Record Reviews are conducted in the Agency office and not on-site.	Financial Record Review	FRR	FRR	Financial Record Review	An extensive detailed review of a handler's compliance with financial responsibility requirements. Financial Record Reviews are conducted in the Agency office and not on-site.
Indication that a handler has self-disclosed the existence of a violation and/or performed an audit and has submitted the information as appropriate to the State or EPA.	Facility Self Disclosure	FSD	FSD	Facility Self Disclosure	Indication that a handler has self-disclosed the existence of a violation and/or performed an audit and has submitted the information as appropriate to the State or EPA.
An inspection of land disposal restriction requirements. Where Land-Ban is inspected in conjunction with another inspection type (CEI, CME, etc.), a separate Handler Evaluation form should be submitted reporting the Land-Ban component.	Land Disposal Restriction Requirements	LBN	FCI	Focused Compliance Inspection with Multimedia Indicator Checkbox and/or Focus Area, when applicable (new Code and Definition)	An FCI is an on-site inspection that addresses only a specific portion or Subpart of the RCRA regulations or authorized State regulations/programs. Some examples of an FCI are a Subpart CC inspection, BIF inspection, Universal Waste Rule inspection, closure verification inspection, training inspections, etc. Nationally defined Focus Areas may be used with this evaluation type to further define the specific scope of the FCI.

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RCRA CEI Performed with the Screening Checklist	<b>RCRA CEI Performed with the Screening Checklist</b>	<b>MMB</b>	<b>CEI</b>	<b>Compliance Evaluation Inspection with Multimedia or Sampling Indicator Checkbox, when applicable (Revised Definition)</b>	A CEI evaluation is primarily an on-site evaluation of the compliance status of the site with regard to all applicable RCRA Regulations and Permits (with the exception of groundwater monitoring and financial assurance requirements). Although portions of a CEI evaluation may routinely be conducted in an agency office setting, such "office" evaluations are considered an integral part of a CEI in terms of completing an evaluation. The overall evaluation of a site's compliance status may take place over multiple days necessitating multiple site visits and activities. The entire set of activities and associated effort is considered a single CEI. The major function of a CEI is an overall review of the site's performance. The inspection includes an on-site examination of records and other documents maintained by the site and an evaluation of the site's compliance with all applicable requirements and adequate sampling, when necessary. Where appropriate, it includes groundwater monitoring assessment outlines or plans, closure/post-closure plans, contingency plan reviews, waste analysis plan reviews, and preparedness and prevention plan reviews. Specifically excluded from the CEI type of evaluation are financial assurance requirements and inspections of groundwater monitoring systems. A review of financial assurance requirements is most often conducted by "agency experts", and appropriately coded as a Financial Record Review (FRR) evaluation. Inspections of groundwater monitoring systems are coded as either a GME or OAM.
This value includes the performance of a RCRA CEI in a coordinated effort with other programs at a handler's site.	<b>Comprehensive and Coordinated Inspection</b>	<b>MMC</b>	<b>CEI</b>	<b>Compliance Evaluation Inspection with Multimedia or Sampling Indicator Checkbox, when applicable (Revised Definition)</b>	A CEI evaluation is primarily an on-site evaluation of the compliance status of the site with regard to all applicable RCRA Regulations and Permits (with the exception of groundwater monitoring and financial assurance requirements). Although portions of a CEI evaluation may routinely be conducted in an agency office setting, such "office" evaluations are considered an integral part of a CEI in terms of completing an evaluation. The overall evaluation of a site's compliance status may take place over multiple days necessitating multiple site visits and activities. The entire set of activities and associated effort is considered a single CEI. The major function of a CEI is an overall review of the site's performance. The inspection includes an on-site examination of records and other documents maintained by the site and an evaluation of the site's compliance with all applicable requirements and adequate sampling, when necessary. Where appropriate, it includes groundwater monitoring assessment outlines or plans, closure/post-closure plans, contingency plan reviews, waste analysis plan reviews, and preparedness and prevention plan reviews. Specifically excluded from the CEI type of evaluation are financial assurance requirements and inspections of groundwater monitoring systems. A review of financial assurance requirements is most often conducted by "agency experts", and appropriately coded as a Financial Record Review (FRR)

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					evaluation. Inspections of groundwater monitoring systems are coded as either a GME or OAM.
This value includes the performance of a RCRA CEI by a specialty trained inspector at a handler's site.,	<b>Detailed Multimedia Inspection</b>	<b>MMD</b>	<b>CEI</b>	<b>Compliance Evaluation Inspection with Multimedia or Sampling Indicator Checkbox, when applicable (Revised Definition)</b>	<p>A CEI evaluation is primarily an on-site evaluation of the compliance status of the site with regard to all applicable RCRA Regulations and Permits (with the exception of groundwater monitoring and financial assurance requirements). Although portions of a CEI evaluation may routinely be conducted in an agency office setting, such "office" evaluations are considered an integral part of a CEI in terms of completing an evaluation. The overall evaluation of a site's compliance status may take place over multiple days necessitating multiple site visits and activities. The entire set of activities and associated effort is considered a single CEI.</p> <p>The major function of a CEI is an overall review of the site's performance. The inspection includes an on-site examination of records and other documents maintained by the site and an evaluation of the site's compliance with all applicable requirements and adequate sampling, when necessary. Where appropriate, it includes groundwater monitoring assessment outlines or plans, closure/post-closure plans, contingency plan reviews, waste analysis plan reviews, and preparedness and prevention plan reviews. Specifically excluded from the CEI type of evaluation are financial assurance requirements and inspections of groundwater monitoring systems. A review of financial assurance requirements is most often conducted by "agency experts", and appropriately coded as a Financial Record Review (FRR) evaluation. Inspections of groundwater monitoring systems are coded as either a GME or OAM.</p>

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A CEI was not performed; however, the screening checklist was performed alone or as part of another type of inspection.	<b>Multimedia Screening Checklist Only</b>	<b>MMS</b>	<b>FCI</b>	<b>Focused Compliance Inspection with Multimedia Indicator Checkbox and/or Focus Area, when applicable (new Code and Definition)</b>	An FCI is an on-site inspection that addresses only a specific portion or Subpart of the RCRA regulations or authorized State regulations/programs. Some examples of an FCI are a Subpart CC inspection, BIF inspection, Universal Waste Rule inspection, closure verification inspection, training inspections, etc. Nationally defined Focus Areas may be used with this evaluation type to further define the specific scope of the FCI.
An evaluation conducted in the Agency office involving a detailed review of non-financial records.	<b>Non-financial Record Review</b>	<b>NRR</b>	<b>NRR</b>	<b>Non-Financial Review</b>	An evaluation conducted in the Agency office involving a detailed review of non-financial records.
The Operation and Maintenance Inspection is a periodic inspection of how well a groundwater monitoring system continues to function once it is considered well designed. The inspection focuses on the condition of wells and sampling devices. Evaluation of well recovery notes, turbidity of water, total depth, depth to water, etc. should be made and compared to historic data. Sampling devices should be tested and if necessary pulled and visually inspected. The findings of an O&M inspection will indicate whether case development is warranted and/or will serve to focus future CMEs. The inspector should be experienced in evaluation of groundwater monitoring systems, e.g., hydrogeologist. This inspection can include sampling. However, if a great deal of sampling is conducted, a separate sampling inspection should be recorded.	<b>Operation and Maintenance Inspection</b>	<b>OAM</b>	<b>OAM</b>	<b>Operation and Maintenance Inspection</b>	The Operation and Maintenance Inspection is a periodic inspection of how well a groundwater monitoring system continues to function once it is considered well designed. The inspection focuses on the condition of wells and sampling devices. Evaluation of well recovery notes, turbidity of water, total depth, depth to water, etc. should be made and compared to historic data. Sampling devices should be tested and if necessary pulled and visually inspected. The findings of an O&M inspection will indicate whether case development is warranted and/or will serve to focus future CMEs. The inspector should be experienced in evaluation of groundwater monitoring systems, e.g., hydrogeologist. This inspection can include sampling. However, if a great deal of sampling is conducted, a separate sampling inspection should be recorded.

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Any type of evaluation other than those listed above.	<b>Other Evaluation</b>	<b>OTH</b>	<b>None</b>		Each Region/State will need to determine an appropriate evaluation type from the new nationally defined values.
	<b>Follow-Up</b>	<b>OTH-01</b>	<b>FUI</b>	<b>Follow Up Inspection (Revised Definition)</b>	A partial on-site inspection conducted to verify the status of violations cited during a previous evaluation. An FUI code value should only be used if the effort involved, or the extent of areas inspected, are insufficient to qualify as one of the more comprehensive evaluation types. Includes inspections following up to formal/informal actions where no enforceable compliance schedule has been established. Does not include any inspections involving an enforceable compliance schedule associated with a formal enforcement action. When an FUI inspection is conducted as part of another inspection type (CEI, GME, etc.), a separate FUI entry should be made in RCRAInfo for the FUI component. Please note that new violations may be cited as a result of an FUI evaluation, and those new violations would be linked to the FUI.
	<b>Case Development</b>	<b>OTH-02</b>	<b>CDI</b>	<b>Case Development Inspection (Revised Definition)</b>	A CDI evaluation is an on-site inspection conducted for the sole purpose of gathering additional information that supports the evidence (i.e., samples, on-site record review, interview, etc.) for a potential or pending enforcement case. A CDI is performed only after an initial evaluation has resulted in the observation of potential violations.
			<b>FCI</b>	<b>Focused Compliance Inspection with Multimedia Indicator Checkbox and/or Focus Area, when applicable (New Code and Definition)</b>	An FCI is an on-site inspection that addresses only a specific portion or Subpart of the RCRA regulations or authorized State regulations/programs. Some examples of an FCI are a Subpart CC inspection, BIF inspection, Universal Waste Rule inspection, closure verification inspection, training inspections, etc. Nationally defined Focus Areas may be used with this evaluation type to further define the specific scope of the FCI.
	<b>Sampling</b>	<b>OTH-03</b>	<b>None</b>		Select applicable evaluation type from nationally defined values and use Sampling Indicator Checkbox
	<b>Complaint</b>	<b>OTH-04</b>	<b>None</b>		Select applicable evaluation type from nationally defined values and use Sampling Indicator Checkbox
	<b>Withdrawal</b>	<b>OTH-05</b>	<b>FCI</b>	<b>Focused Compliance Inspection with Multimedia</b>	An FCI is an on-site inspection that addresses only a specific portion or Subpart of the RCRA regulations or authorized State regulations/programs. Some examples of an FCI are a Subpart CC inspection, BIF inspection, Universal Waste Rule inspection, closure verification inspection, training inspections, etc. Nationally defined Focus Areas may be used with this

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				<b>Indicator Checkbox and/or Focus Area, when applicable (New Code and Definition)</b>	evaluation type to further define the specific scope of the FCI.
	<b>Closure</b>	<b>OTH-06</b>	<b>FCI</b>	<b>Focused Compliance Inspection with Multimedia Indicator Checkbox and/or Focus Area, when applicable (New Code and Definition)</b>	An FCI is an on-site inspection that addresses only a specific portion or Subpart of the RCRA regulations or authorized State regulations/programs. Some examples of an FCI are a Subpart CC inspection, BIF inspection, Universal Waste Rule inspection, closure verification inspection, training inspections, etc. Nationally defined Focus Areas may be used with this evaluation type to further define the specific scope of the FCI.
A determination has been made to remove the SNC designation for a facility. This can be as a result of the facility returning to full physical compliance with regulatory and/or statutory requirements or with a compliance schedule. <i>Note: This is an orphan evaluation record that is not linked to any specific violation or enforcement action. The implementer should enter an SNN record to supersede an SNY record when all outstanding violations have returned to full physical compliance.</i>	<b>Not a Significant Non-Complier(SNC)</b>	<b>SNN</b>	<b>SNN</b>	<b>No Longer a Significant Non-Complier (Revised Definition)</b>	A determination has been made to remove the SNC designation for a facility. This can be as a result of the facility returning to full physical compliance with regulatory and/or statutory requirements or with a compliance schedule. <i>Note: This is an orphan evaluation record that is not linked to any specific violation or enforcement action. The implementer should enter an SNN record to supersede an SNY record when all outstanding violations have returned to full physical compliance.</i>

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<p><b>A Significant Non-Complier (SNC).</b> A determination has been made to classify a facility as a SNC using the following guidelines as set forth in the March 15, 1996 Hazardous Waste Civil Enforcement Response Policy (ERP). A SNC is a facility, which has caused actual exposure or a substantial likelihood of exposure to hazardous waste or hazardous waste constituents; is a chronic or recalcitrant violator; or deviates substantially from the terms of a permit, order, agreement or from RCRA statutory or regulatory requirements. The actual or substantial likelihood of exposure should be evaluated using facility specific environmental and exposure information whenever possible. This may include evaluating potential exposure pathways and the mobility and toxicity of the hazardous waste being managed. However, it should be noted that environmental impact alone is sufficient to cause a facility to be a SNC, particularly when the environmental media affected require special protection (e.g., wetlands or sources of underground drinking water). Facilities should be evaluated on a multi-media basis; however, a facility may be found to be a chronic or recalcitrant violator based solely on prior RCRA violations and behavior.</p> <p><i>Note: This is an orphan evaluation record that is not linked to any specific violation or enforcement action. This determination should be entered into RCRAInfo within 90 days after the implementer (EPA/State) determination is made since the SNC designation will be made publicly available.</i></p>	<p><b>A Significant Non-Complier (SNC)</b></p>	<p><b>SNY</b></p>	<p><b>SNY</b></p>	<p><b>Significant Non-Complier (Revised Definition)</b></p>	<p>A determination has been made to classify a facility as a SNC using the following guidelines as set forth in the March 15, 1996 Hazardous Waste Civil Enforcement Response Policy (ERP). A SNC is a facility, which has caused actual exposure or a substantial likelihood of exposure to hazardous waste or hazardous waste constituents; is a chronic or recalcitrant violator; or deviates substantially from the terms of a permit, order, agreement or from RCRA statutory or regulatory requirements. The actual or substantial likelihood of exposure should be evaluated using facility specific environmental and exposure information whenever possible. This may include evaluating potential exposure pathways and the mobility and toxicity of the hazardous waste being managed. However, it should be noted that environmental impact alone is sufficient to cause a facility to be a SNC, particularly when the environmental media affected require special protection (e.g., wetlands or sources of underground drinking water). Facilities should be evaluated on a multi-media basis; however, a facility may be found to be a chronic or recalcitrant violator based solely on prior RCRA violations and behavior.</p> <p><i>Note: This is an orphan evaluation record that is not linked to any specific violation or enforcement action. This determination should be entered into RCRAInfo within 90 days after the implementer (EPA/State) determination is made since the SNC designation will be made publicly available.</i></p>
<p>This is an evaluation type in which samples are collected for laboratory analysis. A sampling inspection will frequently be conducted in conjunction with the CES or CMS but occurs at a different time or by different personnel to stand on its own as a separate inspection. In those cases, a Handler Evaluation Form for each evaluation (Sampling and CES/CMS) should be completed to reflect that both were done.</p> <p>Sampling inspections may also be necessary for additional enforcement case development.</p>	<p><b>Sampling Inspection</b></p>	<p><b>SPL</b></p>	<p><b>None</b></p>	<p>Select applicable evaluation type from nationally defined values and use Sampling Indicator Checkbox</p>	

## Violation Types Crosswalk

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Name/Description	Type	Type	Description
BIF Standards to Control Emissions	BCE	266.H	Standards for Owners and Operators of HW TSDs: Preparedness and Prevention
BIF Standards for Direct Transfer	BDT		
BIF Interim Status Standards	BIS		
BIF Permit Standards	BPS		
BIF Standards for Regulations of Residue	BRR		
TSD – Corrective action Compliance Schedule	CAS	264.S	Standards for Owners and Operators of HW TSDs: Special Provisions for Cleanup
Compliance Schedule violation Indicates: 1. Compliance Schedule for other than Corrective Action Schedule 2. Compliance Schedule associated with an Enforcement Action.	CSS	FEA	Formal Enforcement Action Violation of a formal enforcement agreement or order.
TSD – Chemical/Physical/Biological Requirements	DCH	265.Q	Interim Status Standards for Owners and Operators of HW TSDs: Chemical, Physical, and Biological Treatment
TSD – Closure/Post-Closure Requirements	DCL	264.G	Standards for Owners and Operators of HW TSDs: Closure and Post-Closure
TSD – contingency Plan Requirements	DCP	264.D	Standards for Owners and Operators of HW TSDs: Contingency Plan and Emergency Procedures
TSD – Financial Responsibility Requirements	DFR	264.H	Standards for Owners and Operators of HW TSDs: Financial Requirements
TSD – General Standards	DGS	264.B	Standards for Owners and Operators of HW TSDs: General Facility Standards
TSD – Groundwater Monitoring Requirements	DGW	265.F	Interim Status Standards for Owners and Operators of HW TSDs: Ground-Waster Monitoring
Incinerator Waste Analysis	DIA	264.O	Standards for Owners and Operators of HW TSDs: Incinerators
TSD – Incinerator Requirements	DIN		
TSD – Land Ban Requirements	DLB	268.A	Land Disposal Restrictions: General
TSD – Landfills Requirements	DLF	264.N	Standards for Owners and Operators of HW TSDs: Landfills
TSD – Land Treatment Requirements	DLT	264.M	Standards for Owners and Operators of HW TSDs: Land Treatment
TSD – Containers Requirements	DMC	264.I	Standards for Owners and Operators of HW TSDs: Use and Management of Containers
Incinerator Monitoring and Inspection	DMI	264.O	Standards for Owners and Operators of HW TSDs: Incinerators

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TSD – Manifest Requirements	<b>DMR</b>	<b>264.E</b>	Standards for Owners and Operators of HW TSDs: Manifest System, Recordkeeping, and Reporting
Incinerator Operating Requirements	<b>DOP</b>	<b>264.O</b>	Standards for Owners and Operators of HW TSDs: Incinerators
TSD – Other Requirements (Implementer Only)	<b>DOR</b>	<b>264.B</b>	Standards for Owners and Operators of HW TSDs: General Facility Standards
TSD – Other Requirements (Oversight Level)	<b>DOT</b>	<b>264.B</b>	Standards for Owners and Operators of HW TSDs: General Facility Standards
TSD – part B Permit Application	<b>DPB</b>	<b>270.B</b>	EPA Administered Permit Programs: the HW: Permit Program Permit Application
TSD – Preparedness/Prevention Requirements	<b>DPP</b>	<b>264.C</b>	Standards for Owners and Operators of HW TSDs: Preparedness and Prevention
Incinerator Performance Standards	<b>DPS</b>	<b>264.O</b>	Standards for Owners and Operators of HW TSDs: Incinerators
TSD – Surface Impoundments Requirements	<b>DSI</b>	<b>264.K</b>	Standards for Owners and Operators of HW TSDs: Surface Impoundments
TSD – Tank Requirements	<b>DTR</b>	<b>264.J</b>	Standards for Owners and Operators of HW TSDs: Tank Systems
TSD – Thermal Treatment Requirements	<b>DTT</b>	<b>265.P</b>	Interim Status Standards for Owners and Operators of HW TSDs: Thermal Treatment
TSD – Waste Piles Requirements	<b>DWP</b>	<b>264.L</b>	Standards for Owners and Operators of HW TSDs: Waste Piles
Formal Enforcement Agreement Can represent: 1. Failure to pay penalty 2. Other 'administrative' violations not tied to RCRA regulations. 3. Omnibus 'bad actor' violations.	<b>FEA</b>	<b>FEA</b>	Formal Enforcement Action Violation of a formal enforcement agreement or order.
Generator – All Requirements (Oversight Level)	<b>GER</b>	<b>262.A</b>	Standards Applicable to Generators of HW: General
Generator – General Requirements (Implementer Only)	<b>GGR</b>	<b>262.A</b>	Standards Applicable to Generators of HW: General
Generator – Land Ban Requirements	<b>GLB</b>	<b>268.A</b>	Land Disposal Restrictions: General
Generator – Manifest Requirements	<b>GM</b>	<b>262.A</b>	Standards Applicable to Generators of HW: General
Generator – Other Requirements	<b>GOR</b>	<b>262.A</b>	Standards Applicable to Generators of HW: General
Generator – Pre-Transport Requirements	<b>GPT</b>	<b>262.C</b>	Standards Applicable to Generators of HW: Pre-Transport Requirements
Generator – Recordkeeping Requirements	<b>GRR</b>	<b>262.D</b>	Standards Applicable to Generators of HW: Recordkeeping and Reporting
Generator – Special Conditions	<b>GSC</b>	<b>262.A</b>	Standards Applicable to Generators of HW: General
Generator – Small Quantity Generator Requirements	<b>GSQ</b>	<b>262.A</b>	Standards Applicable to Generators of HW: General

### Violation Types Crosswalk

Version 2 Violation Areas		Version 3 Violation Types	
Name/Description	Type	Type	Description
Transporter – General Requirements	<b>TGR</b>	<b>263.A</b>	Standards Applicable to Transporters of HW: General
Transporter – Manifest/Recordkeeping Requirements	<b>TMR</b>	<b>263.B</b>	Standards Applicable to Transporters of HW: Compliance with the Manifest System and Recordkeeping
Transporter – Other Requirements	<b>TOR</b>	<b>262.A</b>	Standards Applicable to Generators of HW: General
Transporter – All Requirements (Oversight Level)	<b>TRR</b>	<b>263.A</b>	Standards Applicable to Transporters of HW: General
Transporter – Hazardous Waste Discharges	<b>TWD</b>	<b>263.C</b>	Standards Applicable to Transporters of HW: HW Discharges

### Enforcement Crosswalk

V2 Codes		V3 Codes		
Name	Type	Type	Name	Definition
Verbal Informal	110	110	Verbal Informal	Oral notification by an agency representative informing a RCRA hazardous waste site that they violated applicable laws or requirements. No further action is taken if the site achieves compliance in a timely manner.
Written Informal	120	120	Written Informal	A written notification by an agency representative informing and notifying a RCRA hazardous waste site that they violated applicable laws or requirements, advising the site of what to correct and by what date the correction should take place.
Combination- Informal	190			
Initial 3008(a) Compliance Order	210	210	Initial 3008(a) Compliance Order	Initial formal administrative enforcement action issued by the implementing agency asserting the agency's position that violations have occurred. The respondent/defendant is afforded the opportunity to appeal the agency's determination of violations to a trier of fact. These orders often impose penalties or proposed penalties.
Initial Imminent Hazard Order	220	220	Initial Imminent and Substantial Endangerment Order	Initial formal administrative order issued by the implementing agency addressing conditions which may present an imminent and substantial endangerment to public health or the environment.
Initial Monitoring, Analysis, Test Order	230	230	Initial Monitoring, Analysis, Test Order	Initial formal administrative order issued by the implementing agency addressing situations that require monitoring, testing and/or analysis.
Initial 3008(H) I.S. CA Order (non-HSWA)	240	240	Initial 3008(h) I.S. CA Order	Initial formal administrative order issued by the implementing agency addressing corrective action.
Initial Notice of Non-Compliance, Federal Facility	250	210	Initial 3008(a) Compliance	Initial formal administrative enforcement action issued by the implementing agency asserting the agency's position that violations have occurred. The respondent/defendant is afforded the opportunity to appeal the agency's determination of violations to a trier of fact. These orders often impose penalties or proposed penalties.
Combination- Initial Order	290			

### Enforcement Crosswalk

V2 Codes		V3 Codes		
Name	Type	Type	Name	Definition
Final 3008(A) Compliance Order	310	310	Final 3008(a) Compliance Order	Final formal administrative order issued by the implementing agency asserting the agency's position that remedial action is required. The respondent/defendant is afforded the opportunity to appeal the agency's determination to a trier of fact.
Final Imminent Hazard Order	320	320	Final Imminent Hazard Order	Final formal administrative order issued by the implementing agency addressing conditions which may present an imminent and substantial endangerment to public health or the environment.
Final Monitoring, Analysis, Test Order	330	330	Final Monitoring Analysis, Test Order	Final formal administrative order issued by the implementing agency addressing situations that require monitoring, testing and/or analysis.
Final 3008(H) I.S. CA Order (non-HSWA)	340	340	Final 3008(h) I.S. CA Order	Final formal administrative order issued by the implementing agency addressing corrective action.
Federal Facility Compliance Agreement	350	310	Final 3008(a) Compliance Order	Final formal administrative order issued by the implementing agency asserting the agency's position that remedial action is required. The respondent/defendant is afforded the opportunity to appeal the agency's determination to a trier of fact.
Final CERCLA 106 Order	360	<b>No Code – deleted from V2</b>		
Final CERCLA 104 Order	370	<b>No Code – deleted from V2</b>		
Combination- Final Order	390	310	Final 3008(a) Compliance Order	Final formal administrative order issued by the implementing agency asserting the agency's position that remedial action is required. The respondent/defendant is afforded the opportunity to appeal the agency's determination to a trier of fact.
Referral to Attorney General	410	410	Referral to Attorney General	A formal written request to Attorney General to proceed with judicial enforcement.
Referral to DOJ	420	420	Referral to Department of Justice	A formal written request to the Department of Justice to proceed with judicial enforcement.

### Enforcement Crosswalk

V2 Codes		V3 Codes		
Name	Type	Type	Name	Definition
Referral to District Attorney / City Attorney	430	430	Referral to District Attorney/City Attorney/Country Attorney/State Attorney	A formal written request to a District Attorney, City Attorney, County Attorney, or State Attorney to proceed with judicial enforcement (all judicial referrals levels lower than DOJ and AG levels).
Combination- Judicial Order	490	if agency = S, then 410	Referral to Attorney General	A formal written request to Attorney General to proceed with judicial enforcement. A formal written request to the Department of Justice to proceed with judicial enforcement.
		if agency = E, then 420	Referral to Department of Justice	A formal written request to the Department of Justice to proceed with judicial enforcement.
Civil Action for Compliance	510	510	Initial Civil Judicial Action for Compliance and/or Monetary Penalty	Initial formal legal actions taken (formally filed) for violation(s) that are not criminal actions, which require compliance and/or assessment of monetary penalties.
Civil Action For Imminent Hazards	520	520	Initial Civil Action for Imminent and Substantial Endangerment	Initial formal legal action filed in court to address conditions which may present an imminent and substantial endangerment.
Civil Action For Compliance With Previously Issued Action	530	530	Initial Civil Judicial Action for Corrective Action	Initial formal legal action filed in court to address situations where violations require corrective action remediation response.
Civil Action For Interim Corrective Action	540	510	Initial Civil Judicial Action for Compliance and/or Monetary Penalty	Initial formal legal actions taken (formally filed) for violation(s) that are not criminal actions, which require compliance and/or assessment of monetary penalties.
Civil Action For Monetary Penalties	550			
Combination- Civil Action	590			
Consent Decrees	610	610	Final Civil Judicial Action for Compliance and/or Monetary Penalty	Final formal legal actions taken (formally filed) for violation(s) that are not criminal actions, which require compliance and/or assessment of monetary penalties.

### Enforcement Crosswalk

V2 Codes		V3 Codes		
Name	Type	Type	Name	Definition
Judicial Orders	620	620	Final Civil Judicial Action for Imminent and Substantial Endangerment	Final formal legal action filed in court to address conditions which may present an imminent and substantial endangerment to public health or the environment.
Criminal Actions	710	710	Referral to Criminal	A formal request to another agency or unit of government to proceed with criminal enforcement.
No Code		720	Criminal Indictment	A written notification advising a hazardous waste site they have been charged with a criminal offense.
No code		730	Criminal Conviction	A court ruling which finds a hazardous waste site guilty of a criminal offense.
No code		740	Criminal Acquittal	A court ruling which finds a hazardous waste site not guilty and has been set free from the charge of an offense by verdict, sentence, or other legal process.
State to EPA Administrative Referral	810	810	State to EPA Administrative Referral	A formal written request to EPA from a State to proceed with enforcement.
EPA to State Administrative Referral	820	820	EPA to State Administrative Referral	A formal written request to a State from EPA to proceed with enforcement.
EPA RCRA to EPA CERCLA Administrative Referral	830	830	RCRA to CERCLA Administrative Referral	A formal written request from a State or EPA RCRA program to a State or EPA CERCLA program.
Federal Facility Referral to EPA HQ	850	840	EPA Regions to EPA HQ Administrative Referral	A formal written request from an EPA Region(s) to EPA Headquarters (HQ) that includes Federal Facilities and/or other cases to be handled at the HQ level.

### Enforcement Crosswalk

V2 Codes		V3 Codes		
Name	Type	Type	Name	Definition
No code		850	Administrative Referrals to Other RCRA Programs	A formal written request from a RCRA regulatory program that is referred to another RCRA regulatory program, including UST, Corrective Action, and Municipal Solid Waste.
No code		860	Administrative Referrals to Other Programs	A formal written request form a RCRA regulatory program that is referred to other regulatory programs such as Air, Water, OSHA, etc.
No code		865	Referral to U.S. Treasury	A formal written request to the U.S. Treasury Department to collect penalties.
Combination- Administrative Referral	890	810	State to EPA Administrative Referral	A formal written request to EPA from a State to proceed with enforcement.