

**RCRAInfo CM&E Module
Version 3 Codes and Definitions
Revised May 2008**

Nationally Defined Commitment Types

Note - Additional implementer-defined values will be allowed.

Code	Description
LQG	Large Quantity Generator
Mineral Non-Phosphor	Mineral Processing Non-Phosphoric
Mineral Phosphoric	Mineral Processing Phosphoric
Petroleum Refining	Petroleum Refining
Small Business	Small Business
SQG	Small Quantity Generator
Tribal School	Tribal School
Tribal Waste Mgmt	Tribal Waste Management
TSD	Treatment Storage Disposal

Nationally Defined Evaluation Type

Note: No Implementer Defined Evaluation Types are allowed.

Type	Name	Description
CAC	Corrective Action Compliance Evaluation	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.
CAV	Compliance Assistance Activity	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 (URL: http://www.epa.gov/compliance/resources/policies/planning/state/oprin-integ-mem.pdf). 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.
CDI	Case Development Inspection	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.
CEI	Compliance Evaluation Inspection	<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>
CSE	Compliance Schedule Evaluation	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.
FCI	Focused Compliance	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

Nationally Defined Evaluation Type

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Type	Name	Description
	Inspection	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.
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.
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.
FUI	Follow-Up Inspection	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.
GME	Groundwater Monitoring Evaluation	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.
NIR	No 3007 Information Request Received	Agency conducted an in-agency office review and determined a failure to respond to a 3007 information request.
NRR	Non-financial Record Review	An evaluation conducted in the Agency office involving a detailed review of non-financial records.

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Type	Name	Description
OAM	Operation and Maintenance Inspection	<p>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.</p>
SNN	Not a Significant Non-Complier(SNC)	<p>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. 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.</p>
SNY	A Significant Non-Complier (SNC)	<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. 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.</p>

Nationally Defined FCI Focus Areas

Note: Implementer defined codes are allowed.

Value	Description	Definition
Regulation Specific		
BIF	Boiler/Industrial Furnace Inspection	Inspection focused on compliance with regulatory requirements for boilers and industrial furnaces.
CCI	Subpart CC Inspection	Inspection focused on compliance with air emission standards for tanks, surface impoundments, and containers as covered in 40 CFR 264 and 265, subparts CC.
CFI	Commercial Facility Inspection	Focused inspection at a commercial facility's (i.e., sites covered under the EPA Off-Site Policy) that does not constitute a CEI.
INC	Hazardous Waste Incinerator Inspection	Inspection/observation of the other incinerator activities.
LDR	Land Ban Restrictions	Inspections focused on compliance with the land ban restrictions. Note: This Focus Area is only for use with historical evaluations. THIS WILL NOT BE ALLOWED FOR NEW EVALUATIONS.
PTB	Performance Test (Trial Burns)	Inspection to evaluate trial burn performance.
PTX	Performance Test (Subpart X)	Inspection to evaluate performance under Subpart X requirements.
THI	TSD HWMU Inspection	Compliance monitoring inspections focused on specific regulatory requirements of Hazardous Waste management Units (tanks, surface impoundments, drip pads, etc.).
UIC	Underground Injection Control	Evaluation of compliance with underground injection control requirements.
UOI	Used Oil Inspection	Inspections focused on compliance with Used Oil regulations as covered by 40 CFR 279.
UWR	Universal Waste Rule Inspection	Inspections focused on compliance with the Universal Waste Rule as covered by 40 CFR 273.
Routine/Standardized		
CAR	Corrective Action/Remediation Oversight	Inspection focused on the oversight of corrective action or State remediation activities. Use this code only when the oversight does not represent an evaluation of the site's compliance with the corrective action requirements present in a permit or order (definition of CAO Evaluation type).
CPC	Closure/Post-Closure Inspection	Inspection focused on oversight of closure/post-closure activities, including certification of closure/post-closure.
DOS	Definition of Solid Waste	Inspections to verify information related to variance requests, delisting, solid/hazardous waste determination, speculative accumulation, etc.
EMR	Emergency Response Activity	RCRA activities related to emergency response and subsequent clean-up.

Nationally Defined FCI Focus Areas

Note: Implementer defined codes are allowed.

Value	Description	Definition
IEI	<i>Import/Export Inspection</i>	Inspections to evaluate regulatory compliance for hazardous waste imports and exports.
ISI	<i>Inactive Site Inspection</i>	Inspections to verify the status of a site. This code should only be used when the site's status was verified as inactive.
RTI	<i>Remote Transporter Inspection</i>	Inspections of a transporter's vehicle and associated manifesting documentation from a remote location (i.e., in transit).

Nationally Defined Violation Types

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Code	Description	Definition
261.A	<i>ID and Listing of HW: General</i>	General HW identification as covered in 40CFR 261 Subpart A.
261.B	<i>ID and Listing of HW: Criteria for Identifying the Characteristics of HW and for Listing of HW</i>	General Criteria for HW identification as covered in 40CFR 261 Subpart B.
261.C	<i>ID and Listing of HW: Characteristics of HW</i>	Characteristics for HW as covered by 40CFR 262 Subpart C.
261.D	<i>ID and Listing of HW: Lists of HW</i>	Lists of HW as covered in 40CFR 261 Subpart D.
262.A	<i>Standards Applicable to Generators of HW: General</i>	General requirements for Generators as covered in 40CFR 262 Subpart A.
262.B	<i>Standards Applicable to Generators of HW: Manifest</i>	Manifest requirements for Generators as covered in 40CFR 262 Subpart B.
262.C	<i>Standards Applicable to Generators of HW: Pre-Transport Requirements</i>	Export requirements for Generators as covered in 40CFR 262 Subpart C
262.D	<i>Standards Applicable to Generators of HW: Recordkeeping and Reporting</i>	Import requirements for Generators as covered in 40CFR 262 Subpart D.
262.E	<i>Standards Applicable to Generators of HW: Exports of HW</i>	Export requirements for Generators as covered in 40CFR 262 Subpart E.
262.F	<i>Standards Applicable to Generators of HW: Imports of HW</i>	Import requirements for Generators as covered in 40CFR 262 Subpart F.
262.H	<i>Standards Applicable to Generators of HW: Transfrontier Shipments of HW for Recovery within the OECD</i>	Generator requirements for the OECD as covered in 40CFR 262 Subpart H.
263.A	<i>Standards Applicable to Transporters of HW: General</i>	General requirements for transporters as covered in 40CFR 263 Subpart A.
263.B	<i>Standards Applicable to Transporters of HW: Compliance with the Manifest System and Recordkeeping</i>	General requirements for transporters as covered in 40CFR 263 Subpart B.
263.C	<i>Standards Applicable to Transporters of HW: HW Discharges</i>	Transporter requirements for TSDs as covered in 40CFR 263 Subpart C.

Nationally Defined Violation Types

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Code	Description	Definition
264.A	<i>Standards for Owners and Operators of HW TSDs: General</i>	Preparedness and Disposal facilities (TSDs as covered in 40CFR 264 Subpart A.
264.B	<i>Standards for Owners and Operators of HW TSDs: General Facility Standards</i>	General facility standards for TSDs as covered in 40CFR 264 Subpart B.
264.C	<i>Standards for Owners and Operators of HW TSDs: Preparedness and Prevention</i>	Preparedness and prevention standards for TSDs as covered in 40CFR 264 Subpart C.
264.D	<i>Standards for Owners and Operators of HW TSDs: Contingency Plan and Emergency Procedures</i>	Contingency plan and emergency standards for TSDs as covered in 40CFR 264 Subpart D.
264.E	<i>Standards for Owners and Operators of HW TSDs: Manifest System, Recordkeeping, and Reporting</i>	Manifest system, recordkeeping, and reporting requirements for TSDs as covered in 40CFR 264 Subpart E.
264.F	<i>Standards for Owners and Operators of HW TSDs: Releases from Solid Waste Management Units (SWMUs)</i>	Standards governing releases from solid waste management units as covered in 40CFR 264 Subpart F.
264.G	<i>Standards for Owners and Operators of HW TSDs: Closure and Post-Closure</i>	Closure and post-closure standards for TSDs as covered in 40CFR 264 Subpart G.
264.H	<i>Standards for Owners and Operators of HW TSDs: Financial Requirements</i>	Financial requirements for TSDs as covered in 40CFR 264 Subpart H.
264.I	<i>Standards for Owners and Operators of HW TSDs: Use and Management of Containers</i>	Standards for use and management of containers by TSDs as covered in 40CFR 264 Subpart I.
264.J	<i>Standards for Owners and Operators of HW TSDs: Tank Systems</i>	Standards for TSD tank systems as covered in 40 CFR Subpart J.
264.K	<i>Standards for Owners and Operators of HW TSDs: Surface Impoundments</i>	Standards for TSDs as covered in 40CFR 264 Subpart K.
264.L	<i>Standards for Owners and Operators of HW TSDs: Waste Piles</i>	TSD standards for TSDs as covered in 40CFR 264 Subpart L.
264.M	<i>Standards for Owners and Operators of HW TSDs: Land Treatment</i>	TSD standards for TSDs as covered in 40CFR 264 Subpart M.
264.N	<i>Standards for Owners and Operators of HW TSDs: Landfills</i>	Landfill standards for TSDs as covered in 40CFR 264 Subpart N.

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Code	Description	Definition
264.O	<i>Standards for Owners and Operators of HW TSDs: Incinerators</i>	Standards for TSDs as covered in 40CFR 264 Subpart O.
264.S	<i>Standards for Owners and Operators of HW TSDs: Special Provisions for Cleanups</i>	Standards for TSDs as covered in 40CFR 264 Subpart S.
264.W	<i>Standards for Owners and Operators of HW TSDs: Drip Pads</i>	Standards for TSDs as covered in 40CFR 264 Subpart W.
264.X	<i>Standards for Owners and Operators of HW TSDs: Miscellaneous Units</i>	Standards for process vents at TSDs as covered by 40CFR 264 Subpart X.
264.AA	<i>Standards for Owners and Operators of HW TSDs: Air Emission Standards for Process Vents</i>	Air emission standards for process vents at TSDs as covered in 40CFR 264 Subpart AA.
264.BB	<i>Standards for Owners and Operators of HW TSDs: Air Emission Standards for Equipment Leaks</i>	Air emission standards for equipment leaks at TSDs as covered in 40CFR 264 Subpart BB.
264.CC	<i>Standards for Owners and Operators of HW TSDs: Air Emission Standards for Tanks, Surface Impoundments, and Containers</i>	Air emission standards for TSDs as covered in 40CFR 264 Subpart CC.
264.DD	<i>Standards for Owners and Operators of HW TSDs: Containment Buildings</i>	Containment building standards for TSDs as covered in 40CFR 264 Subpart DD.
264.EE	<i>Standards for Owners and Operators of HW TSDs: HW Munitions and Explosives Storage</i>	Hazardous waste munitions and explosives storage standards for TSDs as covered in 40CFR 264 Subpart EE.
265.A	<i>Interim Status Standards for Owners and Operators of HW TSDs: General</i>	General requirements for TSDs in Interim Status as covered in 40CFR 265 Subpart A.
265.B	<i>Interim Status Standards for Owners and Operators of HW TSDs: General Facility Standards</i>	General facility standards for TSDs in Interim Status as covered in 40CFR 265 Subpart B.
265.C	<i>Interim Status Standards for Owners and Operators of HW TSDs: Preparedness and Prevention</i>	Preparedness and prevention requirements for TSDs in Interim Status as covered in 40CFR 265 Subpart C.

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Code	Description	Definition
265.D	<i>Interim Status Standards for Owners and Operators of HW TSDs: Contingency Plan and Emergency Procedures</i>	Contingency plan and reporting requirements for TSDs in Interim Status as covered in 40CFR 265 Subpart D.
265.E	<i>Interim Status Standards for Owners and Operators of HW TSDs: Manifest System, Recordkeeping, and Reporting</i>	Groundwater monitoring requirements for TSDs in Interim Status as covered in 40CFR 265 Subpart E.
265.F	<i>Interim Status Standards for Owners and Operators of HW TSDs: Ground-water Monitoring</i>	Groundwater monitoring requirements for TSDs in Interim Status as covered in 40CFR 265 Subpart F.
265.G	<i>Interim Status Standards for Owners and Operators of HW TSDs: Closure and Post-Closure</i>	Financial requirements for TSDs in Interim Status as covered in 40CFR 265 Subpart G.
265.H	<i>Interim Status Standards for Owners and Operators of HW TSDs: Financial Requirements</i>	Financial requirements for TSDs in Interim Status as covered in 40CFR 265 Subpart H.
265.I	<i>Interim Status Standards for Owners and Operators of HW TSDs: Use and Management of Containers</i>	Tank system standards for TSDs in Interim Status as covered in 40CFR 265 Subpart I.
265.J	<i>Interim Status Standards for Owners and Operators of HW TSDs: Tank Systems</i>	Tank system standards for TSDs in Interim Status as covered in 40CFR 265 Subpart J.
265.K	<i>Interim Status Standards for Owners and Operators of HW TSDs: Surface Impoundments</i>	Waste pile standards for TSDs in Interim Status as covered in 40CFR 265 Subpart K.
265.L	<i>Interim Status Standards for Owners and Operators of HW TSDs: Waste Piles</i>	Waste pile standards for TSDs in Interim Status as covered in 40CFR 265 Subpart L.
265.M	<i>Interim Status Standards for Owners and Operators of HW TSDs: Land Treatments</i>	Landfill standards for TSDs in Interim Status as covered in 40CFR 265 Subpart M.
265.N	<i>Interim Status Standards for Owners and Operators of HW TSDs: Landfills</i>	Landfill standards for TSDs in Interim Status as covered in 40CFR 265 Subpart N.
265.O	<i>Interim Status Standards for Owners and Operators of HW TSDs: Incinerators</i>	Incinerator standards for TSDs in Interim Status as covered in 40CFR 265 Subpart O.
265.P	<i>Interim Status Standards for Owners and Operators of HW TSDs: Thermal Treatment</i>	Thermal treatment standards for TSDs in Interim Status as covered in 40CFR 265 Subpart P.

Nationally Defined Violation Types

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Code	Description	Definition
265.Q	<i>Interim Status Standards for Owners and Operators of HW TSDs: Chemical, Physical, and Biological Treatment</i>	Drip pad standards for TSDs in Interim Status as covered in 40CFR 265 Subpart Q.
265.R	<i>Underground Injection</i>	Underground Injection applicability as covered in 40CRR 265 Subpart R.
265.W	<i>Interim Status Standards for Owners and Operators of HW TSDs: Drip Pads</i>	Drip pad standards for TSDs in Interim Status as covered in 40CFR 265 Subpart W.
265.AA	<i>Interim Status Standards for Owners and Operators of HW TSDs: Air Emission Standards for Process Vents</i>	Air emission standards for process vents at TSDs in Interim Status as covered in 40CFR 265 Subpart AA.
265.BB	<i>Interim Status Standards for Owners and Operators of HW TSDs: Air Emission Standards for Equipment Leaks</i>	Air emission standards for TSDs in Interim Status as covered in 40CFR 265 Subpart BB.
265.CC	<i>Interim Status Standards for Owners and Operators of HW TSDs: Air Emission Standards for Tanks, Surface Impoundments, and Containers</i>	Standards for munitions and containers at TSDs in Interim Status as covered in 40CFR 265 Subpart CC.
265.DD	<i>Interim Status Standards for Owners and Operators of HW TSDs: Containment Buildings</i>	Containments building standards for TSDs in Interim Status as covered in 40CFR 265 Subpart DD.
265.EE	<i>Interim Status Standards for Owners and Operators of HW TSDs: HW Munitions and Explosives Storage</i>	Standards for munitions and explosive storage at TSDs in Interim Status as covered in 40CFR 265 Subpart EE.
266.C	<i>Standards for the Management of Specific HW and Specific types of HW Management Facilities: Recyclable Materials Used in a Manner Constituting Disposal</i>	Standards for management of recyclable materials used in a manner constituting disposal as covered in 40CFR 266 Subpart C.
266.F	<i>Standards for the Management of Specific HW and Specific types of HW Management Facilities: Recyclable Materials utilized for Precious Metal Recovery</i>	Standards for management of recyclable materials utilized for precious metal recovery as covered in 40CFR 266 Subpart F.

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Code	Description	Definition
266.G	Standards for the Management of Specific HW and Specific types of HW Management Facilities: Spent Lead-Acid Batteries Being Reclaimed	Standards for management of spent lead-acid batteries being reclaimed as covered in 40CFR 266 Subpart G.
266.H	Standards for the Management of Specific HW and Specific types of HW Management Facilities: HW Burned in Boilers and Industrial Furnaces	Standards for management of hazardous waste burned in boilers and disposal as covered in 40CFR 266 Subpart H.
266.M	Standards for the Management of Specific HW and Specific types of HW Management Facilities: Military Munitions	Standards for management of military munitions as covered in 40CFR 266 Subpart M.
266.N	Standards for the Management of Specific HW and Specific types of HW Management Facilities: Conditional Exemption for Low-Level Mixed Waste Storage, Treatment, Transportation, and Disposal	Standards for conditional exemption for low-level mixed waste storage, treatment, transportation, and disposal as covered in 40CFR Subpart N.
268.A	Land Disposal Restrictions: General	General Land Disposal Restriction (LDR) requirements as covered in 40CFR 268 Subpart A.
268.B	Land Disposal Restrictions: Schedule for Land Disposal Prohibition and Establishment of Treatment Standards	Schedule for land disposal prohibition and establishment of treatment standards as covered by 40CFR 268 Subpart B.
268.C	Land Disposal Restrictions: Prohibitions on Land Disposal	Prohibitions on land disposal as covered by 40 CFR 268 Subpart C.
268.D	Land Disposal Restrictions: Treatment Standards	Treatment standards for LDR as covered in 40CFR 268 Subpart D.
268.E	Land Disposal Restrictions: Prohibitions on Storage	Storage prohibitions for LDR as covered in 40CFR 268 Subpart E.
270.A	EPA Administered Permit Programs: the HW Permit Program General Information	General information and requirements for hazardous waste permit as covered in 40CFR 270 Subpart A.
270.B	EPA Administered Permit Programs: the HW Permit Program Permit Application	Application requirements for a hazardous waste permit as covered in 40CFR 270 Subpart B.

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Code	Description	Definition
270.C	<i>EPA Administered Permit Programs: the HW Permit Program Permit Conditions</i>	Permit conditions for a hazardous waste permit as covered in 40CFR 270 Subpart C.
270.D	<i>EPA Administered Permit Programs: the HW Permit Program Changes to Permits</i>	Changes to hazardous waste permits as covered in 40CFR 270 Subpart D.
270.F	<i>EPA Administered Permit Programs: the HW Permit Program Special Forms of Permits</i>	Special forms of hazardous waste permit as covered in 40CFR 270 Subpart F.
270.G	<i>EPA Administered Permit Programs: the HW Permit Program Interim Status</i>	Interim status standards for a hazardous waste permit as covered in 40CFR 270 Subpart G.
270.H	<i>EPA Administered Permit Programs: the HW Permit Program Remedial Action Plans (RAPs)</i>	Remedial action plans (RAPs) as covered in 40CFR 270 Subpart H.
270.I	<i>EPA Administered Permit Programs: the HW Permit Program Integration with Maximum Achievable Control Technology (MACT) Standards</i>	Integration with Maximum Achievable control Technology (MACT) Standards as covered in 40CFR 270 Subpart I.
271.A	<i>Requirements for Authorization of State HW Programs: Requirements for Authorization</i>	
273.A	<i>Standards for Universal Waste Management: General</i>	General requirements for management of universal waste as covered in 40CFR 273 Subpart A.
273.B	<i>Standards for Universal Waste Management: Standards for Small Quantity Handlers of Universal Waste</i>	Standards for small quantity handlers of universal waste as covered in 40CFR 273 Subpart B.
273.C	<i>Standards for Universal Waste Management: Standards for Large Quantity Handlers for Universal Waste</i>	Standards for large quantity handlers of universal waste as covered in 40CFR 273 Subpart C.
273.D	<i>Standards for Universal Waste Management: Standards for Universal Waste Transporters</i>	Standards for transporters of universal waste as covered in 40CFR 273 Subpart D.
273.E	<i>Standards for Universal Waste Management: Standards for Destination Facilities</i>	Standards for destination facilities of universal waste as covered in 40CFR 273 Subpart E.

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Code	Description	Definition
273.F	<i>Standards for Universal Waste Management: Import Requirements</i>	
279.A	<i>Standards for the Management of Used Oil: Definitions</i>	Applicability of the standards for management of used oil as covered in 40CFR 279 Subpart A.
279.B	<i>Standards for the Management of Used Oil: Applicability</i>	Applicability of the standards for management of used oil as covered in 40CFR 279 Subpart B.
279.C	<i>Standards for Used Oil Generators</i>	Standards for used oil generators as covered in 40CFR 279 Subpart C.
279.D	<i>Standards for Used Oil Collection Centers and Aggregation Points</i>	Standards for used oil collection centers and aggregation points as covered in 40CFR 279 Subpart D.
279.E	<i>Standards for Used Oil Transporter and Transfer Facilities</i>	Standards for used oil transporters and transfer facilities as covered in 40CFR 279 Subpart E.
279.F	<i>Standards for Used Oil Processors and Re-Refiners</i>	Standards for used oil processors and re-refiners as covered in 40CFR 279 Subpart F.
279.G	<i>Standards for Used Oil Burners of Off-Specification Used Oil for Energy Recovery</i>	Standards for used oil burners who burn off-specification used oil for energy recovery as covered in 40CFR 279 Subpart G.
279.H	<i>Standards for Used Oil Fuel Marketers</i>	Standards for used oil fuel marketers as covered in 40CFR 279 Subpart H.
279.I	<i>Standards for Used Oil Dust Suppressant and Disposal of Used Oil</i>	Standards for use as a dust suppressant and disposal of used oil as covered in 40CFR 279 Subpart I.
FEA	<i>Formal Enforcement Agreement or Order</i>	Violation of a formal enforcement agreement or order.
FSS	<i>Federal or State Statute</i>	Violations of a Federal or State Statute.
PCR	<i>Permit Condition or Requirement</i>	Violations of a Permit Condition or Requirement.
XXS	<i>State Statute or Regulation</i>	State statutory or regulatory requirements that are broader-in-scope than federal RCRA requirements. Note: Implementers who are broader-in-scope will be able to use Violation Coverage Area code XXS. Additional clarification should be addressed through use of the Citation field.

Return to Compliance (RTC) Qualifier

Code	Name	Description
D	<i>Documented</i>	Site demonstrated that it is in full physical compliance by filing appropriate documentation with the implementing agency.
O	<i>Observed</i>	Verified by on-site inspection that this violation is now in full physical compliance.
N	<i>Not Resolvable</i>	Situations where, although the original violations may still exist or may never have been corrected, there is no further legal action that the agency can pursue to compel the site to bring the violation into full physical compliance. Therefore, the open status of the violation is being closed out. Examples of circumstances that could be considered "not resolvable" include, among others, scenarios involving bankruptcy (company has no financial means to continue efforts to return to compliance), statute of limitations restrictions, and violations which were referred from RCRA to CERCLA (enforcement type 830), Referrals to other RCRA Programs (enforcement type 850), or Referrals Other Programs (enforcement type 860).
U	<i>Unobserved</i>	Situations where it is not possible to verify whether or not the original violation still exists or if it was ever corrected and returned to compliance. This would apply to a variety of scenarios, including: (a) a site is closed and out of business; (b) a facility's permit has expired and the regulated activity is no longer being conducted; (c) a site's operational status has changed from active to inactive; and (d) a site appears to be in full physical compliance but correction of the original violation can not be validated (e.g., the violation was for an unlabeled drum and, based on subsequent inspection, all observed drums on-site are now labeled but it is not possible to determine if the original drum observed to be unlabeled is among the drums currently on-site).

Citation Types

Note: No Implementer Defined Codes are allowed.

Code	Description	Definition
FR	Federal Regulation	Citations of the federal regulations in 40 CFR
FS	Federal Statute	Citations of the federal statute (RCRA).
OC	Order Condition	Citations of terms or conditions of a formal enforceable action.
PC	Permit Condition	Citations of conditions and requirements of a RCRA permit.
SR	State Regulation	Citations of State regulations.
SS	State Statute	Citations of a State statute.
V3	Converted from V2	Code used for conversion of V2 EPA discovered violations or violations which EPA is responsible for, since in V3 all EPA violations must have at least one Citation. No new data entry will be allowed for this code.

Business Rules:

Citation type: OC will always be violation type FEA.

Citation type: PC can be violation type PCR but can also be to other violation types.

Citation type: FS will always be violation type FSS.

Citation type: SS will always be violation type FSS.

All EPA violations must have at least one Citation - both EPA discovered violations and violations which EPA is now responsible for. (State transferred the violation to EPA with an 810 enforcement action.)

HQs Federal Citations

Note: HQs has linked violation types to citations at the lowest Reference Level [ex. 263.20(f)(1)(iii)(A) {Part, Section, Subsection, Paragraph, Subparagraph, and Reference.}] No citation is at a level higher than subsection. For a list of the complete HQs Violation-Citation table, you can look in RCRAInfo Help.

Enforcement Type

Note: Implementer defined Enforcement types are allowed to the 3rd digit (ex. 121)

Type	Description	Definition
100 Series	Informal Administrative Actions - Written and non-written actions that are communications from EPA or a State agency that notify a hazardous waste site there is a problem and violations exist. Informal actions neither propose nor assess penalties.	
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.
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.
130	Notice of Determination	A written notification by an agency representative to a RCRA site in response to the specific site's self-disclosure of specific RCRA violations or requirements.
140	Letter of Intent to Initiate Enforcement Action	A written notification by an agency representative notifying a RCRA hazardous waste site of further follow-up enforcements action by the responsible agency. In some instances, these actions may be considered Notices of Intent or Show Cause letters.
200 Series	Initial Formal Administrative Actions - Initial formal administrative enforcement actions issued by the implementing agency asserting the agency's position that violations have occurred and that require hazardous waste sites to correct violations within a specified period and may propose penalties.	
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.
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.
230	Initial Monitoring, Analysis, Test Order	Initial formal administrative order issued by the implementing agency addressing situations that require monitoring, testing and/or analysis.
240	Initial 3008(h) Interim Status Corrective Action Order (only for non-HSWA violations)	Initial formal administrative order issued by the implementing agency addressing corrective action.

Enforcement Type

Note: Implementer defined Enforcement types are allowed to the 3rd digit (ex. 121)

Type	Description	Definition
250	<i>Field Citation</i>	An expedited initial formal administrative enforcement action addressing violations observed. These actions are often issued directly to a site in the field and assess penalties. In some instances, these actions may be considered "tickets."
300 Series	Final Formal Administrative Actions - Final formal administrative enforcement actions initiated by the implementing agency asserting the agency's position that violations have occurred and that require hazardous waste sites to correct violations within a specified period and may propose penalties.	
310	<i>Final 3008(a) Compliance Order</i>	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.
320	<i>Final Imminent Hazard Order</i>	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.
330	<i>Final Monitoring, Analysis, Test Order</i>	Final formal administrative order issued by the implementing agency addressing situations that require monitoring, testing and/or analysis.
340	<i>Final 3008(h) Interim Status Corrective Action Orders (only for non-HSWA violations)</i>	Final formal administrative enforcement action issued by the implementing agency addressing corrective action remediation needs.
380	<i>Multi Site Super CA/FO</i>	Final formal enforcement code to be used when a super CA/FO is issued pursuant to Part 22.13(b). These Super CA/FOs require a CA/FO sequence number which will be used to tie together all sites involved in this case. (Note: These actions MUST have a CA/FO sequence number, since it always has multiple sites.)
385	<i>Single Site Super CA/FO</i>	Final formal enforcement code to be used when a super CA/FO is issued pursuant to Part 22.13(b). (Note: These actions CANNOT have a CA/FO sequence number. The enforcement involves only one site.)
400 Series	Civil Judicial Referrals - A formal written request to another agency or unit of government to proceed with judicial enforcement (e.g., civil/judicial action) Actions recorded in the 400 series are generally followed by filing of formal actions recorded in the 500 series.	
410	<i>Referral to Attorney General (AG)</i>	A formal written request to Attorney General to proceed with judicial enforcement.
420	<i>Referral to Department of Justice (DOJ)</i>	A formal written request to the Department of Justice to proceed with judicial enforcement.
425	<i>Referral to DOJ to Collect Penalties</i>	A formal written request to the Department of Justice to collect penalties.
430	<i>Referral to District Attorney/City Attorney/County Attorney/State Attorney</i>	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 level)

Enforcement Type

Note: Implementer defined Enforcement types are allowed to the 3rd digit (ex. 121)

Type	Description	Definition
500 Series	Initial Civil Judicial Actions - Initial formal legal actions taken (formally filed) for violation(s) that are not criminal actions, which may seek the imposition of penalties. Actions recorded in the 500 series are generally initiated as a result of a referral as recorded in the 400 series.	
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.
520	Initial Civil Action for Imminent and Substantive Endangerment	Initial formal legal action filed in court to address conditions which may present an imminent and substantial endangerment.
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.
600 Series	Final Civil Judicial Actions - Final formal legal actions taken (formally filed) for violation(s) that are not criminal actions, which may seek the imposition of penalties. Actions recorded in the 600 series are generally initiated as a result of a referral as recorded in the 500 series.	
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.
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.
630	Final Civil Judicial Action of Interim Corrective Action	Final formal legal action filed in court to address situations where violations require corrective action remediation response.
700 Series	Criminal Actions - Formal legal actions taken for knowing violations and knowing endangerments or for placing another person in imminent danger or death or serious bodily injury.	
710	Referral to Criminal	A formal request to another agency or unit of government to proceed with criminal enforcement.
720	Criminal Indictment	A written notification advising a hazardous waste site they have been charged with a criminal offense.
730	Criminal Conviction	A court ruling which finds a hazardous waste site guilty of a criminal offense.
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.
800 Series	Administrative Referrals - A formal written request to another agency or unit of government to proceed with enforcement or to proceed with compliance investigation.	
810	State to EPA Administrative Referral	A formal written request to EPA from a State to proceed with enforcement.
820	EPA to State Administrative Referral	A formal written request to a State from EPA to proceed with enforcement.
830	EPA RCRA to EPA CERCLA Administrative Referral	A formal written request from a State or EPA RCRA program to a State or EPA CERCLA program.
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 Type

Note: Implementer defined Enforcement types are allowed to the 3rd digit (ex. 121)

Type	Description	Definition
850	<i>Administrative Referrals to other RCRA Programs</i>	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.
860	<i>Administrative Referrals to other Programs</i>	A formal written request from a RCRA regulatory program that is referred to other regulatory programs such as Air, Water, OSHA, etc.
865	<i>Referral to US Treasury</i>	A formal written request to the U.S. Treasury Department to collect penalties.

Disposition Status Codes

Code	Description	Definition
AS	Action Satisfied (Case Closed)	The specific enforcement action is officially closed and has no outstanding settlement payment or other terms or conditions remaining to be satisfied.
DR	Dropped	The specific enforcement action has been rejected, terminated, or removed from further consideration.
DS	Dismissed	The specific enforcement action has been dismissed by the court.
PC	Public Review Completed	The specific enforcement action has completed it's Public Review period.
PR	Open for Public Review	The specific enforcement action is open for Public Review.
RI	Reinstated	The specific enforcement action was reinstated after having been dropped, returned, revoked, withdrawn
RT	Returned	The specific enforcement action has been returned from the agency the case had been referred to without an enforcement action being taken. (For example, a case referred to DOJ was returned because DOJ declined to pursue the case and, as a result, the referral was returned to the referring agency for them to reconsider other enforcement options.)
RV	Revoked	The specific enforcement action has been annulled, rescinded, repealed, canceled or otherwise made void.
WD	Withdrawn	The specific enforcement action has been officially withdrawn.

Media Types

Type	Description	Definition
AIR	<i>Air</i>	Clean Air Act and other air programs
CRE	<i>EPA CERCLA</i>	Comprehensive Environmental Response, Compensation, and Liability Act program (EPA)
CRS	<i>State CERCLA – Type Programs</i>	State programs similar in type to the federal CERCLA program
EPC	<i>EPCRA</i>	Emergency Planning and Community Right to Know Act program
FIF	<i>FIFRA</i>	Federal Insecticide, Fungicide, and Rodenticide Act program
MSW	<i>RCRA Municipal Solid Waste</i>	RCRA Municipal Solid Waste program (Federal or State type program)
ORP	<i>Other Regulatory Programs</i>	Other regulatory programs (including OSHA and other miscellaneous programs)
PCB	<i>TSCA PCB</i>	Toxic Substances Control Act (Polychlorinated Biphenyls) program
RCA	<i>RCRA Corrective Action</i>	RCRA Corrective Action program
SPC	<i>SPCC</i>	Spill Prevention and Control and Countermeasures program
TSC	<i>TSCA (non-PCB)</i>	Toxic Substances Control Act (non-PCB) program
UIC	<i>UIC</i>	Underground Injection Control program
UST	<i>UST</i>	Underground Storage Tanks program
WAT	<i>Water</i>	Clean Water Act, Safe Drinking Water Act, and other water programs
WET	<i>Wetlands</i>	Wetlands program

Penalty Type

Type Code	Name	Description
For 100 Series Enforcement Action Types: These actions are informal enforcement actions. No penalties should be associated with this type of enforcement action series.		
----	None	
For 200 and 300 Series Enforcement Action Types: These actions may involve penalties or no penalty at all. Since these series will be used to track formal enforcement actions from initial filing through to issuance of a final order or agreement and payment of penalty, all penalty code descriptors can be used.		
PMP	<i>Proposed Monetary Penalty</i>	The amount of the total penalty in dollars proposed in an initial enforcement action.
FMP	<i>Final Monetary Penalty</i>	The amount of the total penalty in dollars a site named in an enforcement action must pay directly to the responsible agency (for consent agreements with SEP, this is exclusive of SEP credits).
FSC	<i>Final SEP Cost</i>	The amount referenced in an enforcement action, at the issuance of the agreement, as the cost in dollars to the site of a supplemental environmental project (SEP). The amount is used as the basis to determine how much of the cost may be applied as a SEP Credit (SCR) to offset a portion of a penalty.
SCR	<i>SEP Credit</i>	The actual or estimated credit in dollars allowed by the agency for the completed SEP and applied towards the total final settlement amount. This is the dollar amount used as an offset to the actual penalty amount, and usually represents only a portion of the actual cost (FSC) of the SEP. Note: Once actual final SEP amount is known this field should be modified to reflect the actual amount.
ZAP	<i>Zero Ability to Pay</i>	Used to track a final monetary penalty of zero to allow the recording of circumstances where the State or Region assessed a monetary penalty but later, through whatever means available, justified that the facility is unable to pay a penalty. Penalty type "ZAP" allows the tracking of this final assessed/settled penalty of \$0. Note: The penalty amount for penalty type "ZAP" can only be \$0 (zero) and implementers must enter an explanation as to why there was an inability to pay the penalty into the penalty notes field. The notes field for penalty type "ZAP" will be enforcement sensitive and will never be released to the public.

Penalty Type

Type Code	Name	Description
<p>For 400 Series Enforcement Action Types: These actions may or may not involve recommendations for proposed penalties. If a proposed penalty is being included in the referral, it may be captured by using the Proposed Monetary Penalty code (PMP). No other code may be associated with 400 series actions.</p>		
PMP	<i>Proposed Monetary Penalty</i>	The amount of the total penalty in dollars proposed in an initial enforcement action.
ZAP	<i>Zero Ability to Pay</i>	<p>Used to track a final monetary penalty of zero to allow the recording of circumstances where the State or Region accessed a monetary penalty but later, through whatever means available, justified that the facility is unable to pay a penalty.</p> <p>Penalty type "ZAP" allows the tracking of this final assessed/settled penalty of \$0. Note: The penalty amount for penalty type "ZAP" can only be \$0 (zero) and implementers must enter an explanation as to why there was an inability to pay the penalty into the penalty notes field. The notes field for penalty type "ZAP" will be enforcement sensitive and will never be released to the public.</p>
<p>For 500 and 600 Enforcement Action Types: These are the actions taken as a result of referrals made in the 400 series. For the 500 and 600 series, all penalty type codes may be used, as appropriate.</p>		
PMP	<i>Proposed Monetary Penalty</i>	The amount of the total penalty in dollars proposed in an initial enforcement action.
FMP	<i>Final Monetary Penalty</i>	The amount of the total penalty in dollars a site named in an enforcement action must pay directly to the responsible agency (for consent agreements with SEP, this is exclusive of SEP credits).
FSC	<i>Final SEP Cost</i>	The amount referenced in an enforcement action, at the issuance of the agreement, as the cost in dollars to the site of a supplemental environmental project (SEP). The amount is used as the basis to determine how much of the cost may be applied as a SEP Credit (SCR) to offset a portion of a penalty.
SCR	<i>SEP Credit</i>	The actual or estimated credit in dollars allowed by the agency for the completed SEP and applied towards the total final settlement amount. This is the dollar amount used as an offset to the actual penalty amount, and usually represents only a portion of the actual cost (FSC) of the SEP. Note: Once actual final SEP amount is known this field should be modified to reflect the actual amount.
ZAP	<i>Zero Ability to Pay</i>	<p>Used to track a final monetary penalty of zero to allow the recording of circumstances where the State or Region accessed a monetary penalty but later, through whatever means available, justified that the facility is unable to pay a penalty.</p> <p>Penalty type "ZAP" allows the tracking of this final assessed/settled penalty of \$0. Note: The penalty amount for penalty type "ZAP" can only be \$0 (zero) and implementers</p>

Penalty Type

Type Code	Name	Description
		must enter an explanation as to why there was an inability to pay the penalty into the penalty notes field. The notes field for penalty type "ZAP" will be enforcement sensitive and will never be released to the public.
For 700 Enforcement Action Types: These actions involve enforcement actions to address criminal activity. In criminal actions, program offices will not be aware of any penalties until a fine has been handed down after conviction of the violator. At that point, the penalty is considered "final." Accordingly, in cases where fines are included in the sentencing by a judge, the fine should be recorded as a Final Monetary Penalty (FMP).		
FMP	<i>Final Monetary Penalty</i>	The amount of the total penalty in dollars a site named in an enforcement action must pay directly to the responsible agency (for consent agreements with SEP, this is exclusive of SEP credits).
ZAP	<i>Zero Ability to Pay</i>	<p>Used to track a final monetary penalty of zero to allow the recording of circumstances where the State or Region assessed a monetary penalty but later, through whatever means available, justified that the facility is unable to pay a penalty.</p> <p>Penalty type "ZAP" allows the tracking of this final assessed/settled penalty of \$0. Note: The penalty amount for penalty type "ZAP" can only be \$0 (zero) and implementers must enter an explanation as to why there was an inability to pay the penalty into the penalty notes field . The notes field for penalty type "ZAP" will be enforcement sensitive and will never be released to the public.</p>
For 800 Enforcement Action Types: These actions are administrative referrals to other regulatory program offices to address. No penalties should be associated with this type of enforcement action series.		
---	None	
Total Final Settlement		
<p>Total Final Settlement is another type of penalty amount which is not included as a value under Type of Penalty Amount Indicator. The Total Final Settlement must be calculated by summing the amount of the Final Monetary Penalty and the amount of the SEP Credit. For example, a final settlement could have a total settlement amount of \$100,000. The settlement might require the site to send the responsible agency a check for \$80,000 and engage in one or more supplemental environmental projects for which the agency would allow \$20,000 in credit. To calculate Total Final Settlement: Sum the Penalty Amount field for penalty types "FMP" and "SCR".</p>		

Nationally Defined Supplemental Environmental Project (SEP) Codes

Note: Implementer defined Enforcement types are allowed.

Code	Description	Definition
EAA	Environmental Audits and Assessment	SEP types that involve auditing and assessment activities.
EAP	Environmental Awareness Programs	SEP types that involve education and outreach activities, to both regulated and non-regulated communities.
EPP	Emergency Planning and Preparedness	SEP types involving emergency planning, preparedness, and related emergency management activities.
ERE	Environmental Restoration	SEP types involving environmental restoration and revitalization activities.
EMS	Environmental Management Systems	SEP types involving Environmental Management Systems. Note: These types of SEPs must still be approved by HQ prior to issuance.
PHE	Public Health	SEP types involving activities impacting on public health.
PPR	Pollution Prevention and Reduction	SEP types involving pollution prevention and/or pollution reduction activities.