

## **Region 3 RCRA Corrective Action Long-Term Stewardship Approach**

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The Region 3 Approach to Long-Term Stewardship (LTS) relies on existing EPA guidance<sup>1</sup> developed with the goal to assess the long term effectiveness of completed remedies – engineered controls (EC) and institutional controls (IC) - at RCRA Corrective Action facilities in the Region. Region 3 conducts LTS screening evaluations, through a combination of field inspections and records review, to ensure that controls remain in place, are maintained and operated in the manner envisioned when EPA selected the remedy, and that the local community remains aware of the remedy in place. The evaluations began in FY14 as a pilot, and have continued every year since.

Region 3's implementation strategy for its LTS approach is as follows:

### **Target Universe:**

In order to assess the approach and the associated resource demands, the Region conducted about 15 LTS evaluations per year since FY14. The target facilities were those with remedies older than 10 years. As of November 2017, there were more than 200 facilities in Region 3 with completed remedies that include EC and/or IC elements. Higher priority for assessment is given to facilities with remedies where failure has the potential to pose a more immediate threat to human health and the environment.

Targets for FY18 and beyond will be set to correspond with a reasonable balance of resources and workload with the goal to reach a frequency of LTS evaluations at each facility of once every five years by FY2020.

### **EC/IC Assurance Monitoring:**

EC/IC assurance monitoring will be conducted to evaluate whether the EC/ICs are functional and maintained. Facility Inspection will be conducted to (1) ensure that the engineering controls selected and implemented remain intact and undamaged; (2) verify that the use of the property has conformed to any applicable use restrictions; and (3) determine whether any potential IC or EC deficiencies have been identified and are being addressed in a timely manner.

### **Transparency and Awareness:**

A key element of Region 3 LTS approach is to heighten or refresh the local community awareness of the elements of the remedy and its progress towards meeting the performance standards. We plan to accomplish that by re-engaging the local officials at the time of the LTS evaluation and making readily available, through the web, documentation and maps depicting the ECs and ICs.

To support this program Region 3 will be implementing the following:

1. Mapping of the extents of ICs and ECs selected as part of final remedies<sup>2</sup>
  - a. New sites – ask facilities to provide geographic coordinates for IC/EC areas in acceptable format

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<sup>1</sup> **Institutional Controls:** A Guide to Planning, Implementing, Maintaining, and Enforcing Institutional Controls at Contaminated Sites, available at: [https://www.epa.gov/sites/production/files/documents/final\\_pime\\_guidance\\_december\\_2012.pdf](https://www.epa.gov/sites/production/files/documents/final_pime_guidance_december_2012.pdf)

**Institutional Controls:** A Guide to Preparing Institutional Control Implementation and Assurance Plans at Contaminated Sites, available at: [https://www.epa.gov/sites/production/files/documents/iciap\\_guidance\\_final\\_-\\_12.04.2012.pdf](https://www.epa.gov/sites/production/files/documents/iciap_guidance_final_-_12.04.2012.pdf)

<sup>2</sup> **Mapping of Institutional and Engineering Controls in RCRA Corrective Action, Land and Chemicals Division, EPA Region 3** (April 21, 2011) - This guidance describes EPA Region 3's efforts to map institutional and engineering controls, and describes appropriate file formats for facilities to provide. Available at: [https://www.epa.gov/sites/production/files/2016-07/documents/rcra\\_mapping\\_of\\_institutional\\_and\\_engineering\\_controls.pdf](https://www.epa.gov/sites/production/files/2016-07/documents/rcra_mapping_of_institutional_and_engineering_controls.pdf)

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- b. Old sites – use best efforts to acquire GIS/CAD from existing/prior owners, otherwise map areas in GIS from metes & bounds or other survey or interpolated data
2. Providing maps and information on our public website
  - a. Post Google Map view of mapped ICs/ECs on website for each site; polygons show extents of ICs/ECs with pop-up descriptions (other mapping options currently being evaluated)
  - b. Post geospatial PDF map to website showing IC/EC areas
  - c. Provide text description of site remedy and controls on facility web page
  - d. Provide links to PDFs of site documents, including IC documents (such as environmental covenants, post remedial care plans, etc.)
  - e. Post Remedy Decision and LTS evaluation documents on website
3. Recording maps and information in our national database
  - a. Record each IC and EC in RCRAInfo (include IC/EC description in notes field)
  - b. Link each IC and EC to appropriate area name (e.g., entire facility, landfill cap, etc.)
  - c. Upload polygon coordinates for each area to RCRAInfo
4. EC/IC Assurance Monitoring
  - a. Develop site inspection checklist based on remedy components (both ICs and ECs)
  - b. Conduct site inspection (using checklist and geospatial PDF)
  - c. Conduct document review (in-house and with current site owners, state and local agencies)
  - d. Generate EC/ IC assurance Monitoring report
  - e. Record the outcome of the evaluation in RCRAInfo using Region 3 codes for Long-Term Stewardship (i.e., Pass; Need Minor Maintenance; or Further Evaluation Needed)
  - f. Identify and correct EC/IC deficiencies and incompatible uses
5. Contacting local officials in the vicinity of the facilities under LTS evaluation to update them in the status of the remedies and the progress towards the performance standards.