

Region 3 Required Corrective Action - Event Codes (National & Region 3)

Lookup KEY		Definition	
A		You can find this National event code defined in RCRAInfo Website under System Documentation-Version 4-> Technical Documentation ->Corrective Action	
B		You can find this Region 3 event code defined in the Attachment to this document "Region 3 Defined Values for Corrective Action Event Codes"	
The following milestones in the corrective action process have codes in RCRAInfo. If an event occurs, submit the event code for input in RCRAInfo.			
#	Event Code	Event Description	Lookup KEY
1	CA100	Investigation Imposition/RFI Imposed	A
2	CAF101	RCRAFIRST Investigation Objectives Meeting Held (CAF)	B
3	CAF102	RCRAFIRST Corrective Action Framework (CAF) Final	B
4	CA110	RFI Workload Received	A
5	CA150	RFI Workload Approved	A
6	CA180	Investigation Implementation Begun	A
7	CAF181	Investigation Implementation Completed- Data Review Meeting	B
8	CA190	RFI Report Submitted	A
9	CA200	Investigation Complete	A
10	CAF201	RCRAFIRST Remedy Selection Process (RSP) Meeting Prep	B
11	CAF202	Conduct RSP Meeting	B
12	CAF203	RSP Finalized	B
13	CA260	CMS Work Plan Received	A
14	CA270	CMS Work Plan Modified (Optional)	A
15	CA300	CMS Work Plan Approved	A
16	CA340	CMS Report Submitted	A
17	CA350	CMS Report Approved	A
18	CA380	Develop Statement of Basis	A
19	CA400	Remedy Decision	A
20	CA550xx (NR, RC)	Construction Completed (No Remedy Constructed, Remedy Constructed)	A
21	CA725XX (IN, NO, YE)	Human Health Environmental Indicator (More information needed, No, Yes)	A
22	CA750 (IN, NO, YE)	Groundwater Environmental Indicator (More information needed, No, Yes)	A
23	CA770XX (GW, NG)	Engineering Controls Established (Groundwater, Non-groundwater)	A
24	CA772XX (EP, GC, ID, PR)	Institutional Controls Established (Enforcement and Permit Tools, Governmental Control, Informational Device, Proprietary Control)	A
25	CAM790	Corrective Action Area Mapped	B
26	CAF300	Post-Remedy Assessment	B
27	CA800 (YE, NO)	Ready for Anticipated Use (RAU) (Yes, No)	A
28	CAS88P(X), CAS88N(X), CAS88F(X)	Long Term Stewardship Evaluation (Pass, Need Minor Maintenance, Further Evaluation Needed) (X= evaluation #)	B
29	CA900 (CR, NC)	Performance Standards Attained (Controls Required, No Controls Necessary)	A

30	CA999	CA Process is terminated - No Further Action	A
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Region 3 Defined Values for Corrective Action Event Codes

Long Term Stewardship Tracking Codes:

CAS88P(X) LT Stewardship – Pass

- This event signifies that a Long Term Stewardship assessment completed and determined that all Institutional Controls and/or Engineering controls (IC/EC) are in place, maintained and operated in the manner envisioned when EPA/State selected the remedy, and with current policies and practices. (I.e. we used to accept Deed restrictions as IC, we now prefer Covenants)
- X = Assessment number (#1-9)
- National required – No
- Scheduled Date – N/A
- Actual Date - Date of Report if the inspection passes immediately. If inspection was first scored as “Need Minor Maintenance” or “Further Evaluation Needed”, and then receives a Pass grade, use the date that the Facility corrects the issues requested.
- Notes Section – “Actual Date of Inspection - (MM/DD/YYYY). This LTS report can be found on the Corrective Action Facility page on the EPA Region 3 - RCRA Corrective Action website.”

CAS88N(X) LT Stewardship – Need Minor Maintenance

- This event signifies that a Long Term Stewardship assessment was performed and additional information or changes in operation, maintenance of the IC/EC are needed to make a CAS88PX determination (i.e. As a result of the LTS we required/recommend the to get an Environmental Covenant as an update to a deed restriction.
- X = Assessment number (#1-9)
- National required – No
- Scheduled Date – N/A
- Actual Date - Date of Report
- Notes Section – “Actual Date of Inspection - (MM/DD/YYYY). Measures required to mark this inspection as Pass. This LTS report can be found on the Corrective Action Facility page on the EPA Region 3 - RCRA Corrective Action website.”

CAS88F(X) LT Stewardship – Further Evaluation Needed

- This event signifies that a Long Term Stewardship assessment was performed and that selected IC/EC **are not** in place, operated or maintained, or other issues are identified that suggest that the integrity and/or the protectiveness of the selected remedy (or elements of the selected remedy) is questionable, therefore a comprehensive remedy compliance assessment is required. (I.e. Facility has not put in place an Institutional Control, or has not conducted the required GW monitoring, and new release has been National required – No
- X = Assessment number (#1-9)
- National required – No
- Scheduled Date – N/A
- Actual Date - Date of Report
- Notes Section – “Actual Date of Inspection - (MM/DD/YYYY). Further evaluation is required to mark this inspection as Pass. This LTS report can be found on the Corrective Action Facility page on the EPA Region 3 - RCRA Corrective Action website.”

RCRA FIRST Approach Metrics Tracking

[Nationally required = CA100 “RFI Imposed”]

CAF101 RCRAFIRST Investigation Objectives Meeting Held (CAF)

- Important to track actual process performance vs. LEAN targets
- “Starts the clock” on RCRAFIRST projects. Important to track actual process performance vs. LEAN targets
- Nationally required – No
- Scheduled Date – Scheduled date of meeting
- Actual Date – Date of meeting

CAF102 RCRAFIRST Corrective Action Framework (CAF) Final

- CAF itself is unsigned to avoid creating a contract – no need for legal review. Initiating document should be an e-mail with CAF attached or just an e-mail
- Nationally required – No
- Scheduled Date – Scheduled date for completion
- Actual Date – Date of completion

CAF181 Investigation Implementation Completed- Data Review Meeting

- Optional, but recommended. Facility and State/Agency meet to discuss adequacy of data for Remedy selection and data gaps discovered before report is written.
- Nationally required – No
- Scheduled Date – Scheduled date of completion
- Actual Date – Date of completion

CAF201 RCRAFIRST Remedy Selection Process (RSP) Meeting Prep

- Use the approximate date State/Agency discuss corrective action objectives and the need for CMS or other additional work in order to define objectives and complete Administrative Record
- Nationally required – No
- Scheduled Date – N/A
- Actual Date – Date of prep

CAF202 Conduct RSP Meeting

- Nationally required – No
- Scheduled Date – Scheduled date of RSP meeting
- Actual Date – Date of RSP meeting

CAF203 RSP Finalized

- RSP itself is unsigned to avoid creating a contract – no need for legal review
- Initiating document should be an e-mail with RSP attached or just an e-mail
- Nationally required – No
- Scheduled Date – Scheduled date of RSP meeting
- Actual Date - Date of RSP document

CAM790 Corrective Action Area Mapped

- The event by which a RCRA facility AREA_NAME linked to either an IC or EC has been mapped. This event is achieved when the following have been completed:
 - o The Region has a shapefile which represents the area or feature (polygon or line)
 - o A geospatial pdf map including the area is uploaded to the Documents page for the facility on the R3 website
 - o The shapefile representing the AREA_NAME has been added to the Region 3 Corrective Action Facility geodatabase
 - o The revised geodatabase has been published and is available for website mapping
- Initiating Sources - Notification is done by a GIS mapper (GISM)
- Nationally Required – No
- Actual date- Date that all four items (shapefile available, geospatial pdf on website, geodatabase updated, and updated geodatabase published) is true

CAF300 Post-Remedy Assessment

- The event by which a RCRA facility submits a written summary of the results of a post-remedy assessment or observation. Examples include environmental covenant compliance reports, progress reports, inspection reports, post-remedy groundwater monitoring reports, notifications of transfer of property and notifications of interest in property.
- Initiating Sources - Report or notification to State or USEPA by RCRA facility
- Nationally Required - No
- Scheduled Date - Date in Final Decision or Environmental Covenant conditions
- Actual Date- Date in which report or notification is received by State or USEPA.