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MEMORANDUM

SUBJECT: Interim-Final Guidance for RCRA Corrective Action Environmental Indicators

FROM: Elizabeth Cotsworth, Acting Director
Office of Solid Waste

TO: RCRA Senior Policy Managers
Regions I-X

The RCRA corrective action program and achievement of its Government Performance Results Act (GPRA) goals are of highest priority for the national RCRA program. The RCRA program is using two Environmental Indicators (EI) to measure program performance for GPRA purposes: (1) Current Human Exposures Under Control (CA725), and (2) Migration of Contaminated Groundwater Under Control (CA750).

With this memorandum I am transmitting revised guidance on how to determine if a facility has met the RCRA corrective action Environmental Indicators (EI). This Interim-Final guidance will replace the existing EI guidance (from 1994 and 1995) and will remain the working guidance for at least one year. The Interim-Final guidance is similar to the earlier guidance but has been modified to facilitate more consistent determinations (across regions and states) and to be more explicit with regard to the minimum level of documentation required to ensure that the determinations will be verifiable.

This guidance has been developed with the cooperation and input of representatives from all ten EPA regions and at least one state from each region. The guidance is in the form of questions to be answered in making an EI determination. The questions and answer options express the minimum criteria for EI determinations and are not to be modified for regional, state or site-specific conditions. The "Rationale" portion of the forms can be filled in to explain unique situations to any length necessary. While the signed hard-copies of these forms should reside in the facility's administrative files, these forms should also be kept in electronic format that can be posted on an "EI database" web site to be developed by the Office of Solid Waste in the near future. The "EI database" will help communicate successes and provide examples for overcoming barriers to progress.

Thank you for your assistance with this important effort. If you have any questions, please call Bob Hall or Henry Schuver of my staff at (703) 308-8432 or 308-8656 respectively.

Attachment