

Region 3 Corrective Action - Long Term Stewardship Evaluation Codes in RCRAinfo

- X = evaluation #. For example, the first LTS inspection completed on the site is evaluation #1.
- **CAS88P(X) LT Stewardship – Pass**
 - This event signified 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)
 - Template when Event is entered in to RCRAinfo–
 - 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). Once these measures are completed, enter CAS88P(X) event code to mark the inspection as “Pass”.
 - Template when Event is entered in to RCRAinfo
 - 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 identified and need investigation). Once these measures are completed, enter CAS88P(X) event code to mark the inspection as “Pass”.
 - Template when event is entered in to RCRAinfo
 - 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.”