



RCRA 2020 Update

GOALS, PROGRAM STATUS & KEY TAKEAWAYS

RCRA 2020 Baseline Update

In the early 1990’s the United States Environmental Protection Agency (EPA) and the authorized States began prioritizing appropriate sites for their Corrective Action focus. This program has evolved over the years with major efforts in 1999, 2005, and 2008 to continue to push the prioritization of sites in their Baseline program for early cleanup, protection of both human health and groundwater resources, and final remedy decisions. In 2009, an expanded list of 3,746 facilities was introduced as the Resource Conservation and Recovery Act (RCRA) 2020 Baseline. These sites were already in the RCRA correction action program – and became the focus to meet the projected 2020 closure goals. In 2013, the number of 2020 Baseline sites was updated to include 3,779 facilities. EPA’s objective was to achieve 95% compliance with three primary goals at these sites by 2020:

1. Human Exposures Under Control
2. Migration of Contaminated Groundwater Under Control
3. Remedy Construction (Complete)

The EPA forecasts by the end of 2020 that 96% of the baseline facilities will meet goal 1, 91% of the baseline facilities will meet goal 2, and 79% of the baseline facilities will meet goal 3.

EPA released five new RCRA goals (shown below). These goals are detailed in the **RCRA Corrective Action Program Vision/Mission/Goals for 2030 Fact Sheet** on the EPA website:

<https://www.epa.gov/hw/fact-sheet-rcra-corrective-action-program-visionmissiongoals-2030>

2030 Vision, Mission, and Goals for the RCRA Corrective Action Hazardous Waste Facility Program¹

<p>Goal 1: Through 2030</p> <p>Efficient and expeditious start and completion of RCRA cleanups.</p>	<p>Goal 2: By 2030</p> <p>Eliminate or control adverse impacts beyond RCRA Corrective Action facility boundaries and focus attention on cleanups that will not meet this target.</p>	<p>Goal 3: By 2030</p> <p>Confirm that the land within RCRA Corrective Action facility boundaries is safe for continued use and potential future use.</p>
<p>Goal 4: By 2025</p> <p>Identify key elements of effective Long-Term Stewardship for Corrective Action cleanups. Regions and states will have approaches in place to implement the key elements.</p>	<p>Goal 5: By 2022</p> <p>Implement procedures to regularly adjust the universe of facilities in the cleanup pipeline to reflect current program priorities.</p>	

¹Five new goals released by the EPA on September 1, 2020.



How do the new RCRA 2030 goals affect you? What should you be focused on moving forward?

- **RCRA 2030 Goal 1:** For sites under the RCRA 2020 program, you will continue to work with your EPA and state agency representatives. There are currently no indications of change in the state and EPA management approaches. The goal includes the statement “for commitments and tracking, the program will use the relevant Corrective Action Program measures and will use flexible approaches appropriate for each region and state.”
- **RCRA 2030 Goal 2 and Goal 3:** These goals identify which sites will be targeted for the post-2020 focus. Additional scrutiny can be anticipated for those sites with off-site migration of contaminants and for the facilities that are dealing with emerging contaminants and risks such as per- and polyfluoroalkyl substances (PFAS) and vapor intrusion.
- **RCRA 2025 Goal 4:** Stewardship of long-term controls, including redevelopment, will be a focus. Long-term stewardship assessments are being performed by EPA; facilities with completed remedies of 5 years or older are being prioritized. For those facilities that have met or will meet the closure goals, developing a plan to address long-term controls and ensure redevelopment, where appropriate, should be considered and can be key to reducing facility scrutiny from the EPA or state agency.
- **RCRA 2022 Goal 5:** The focus will be shifted away from facilities that have a remedy in place that meets the 2020 Baseline goals and the new 2030 goals or a facility that is considered “cleaned up or complete” by EPA. The EPA noted that many of the projects in the RCRA 2020 Baseline already meet this standard and could be out of the pipeline by 2022. A review of those RCRA 2020 sites, along with an evaluation of the status and likelihood if they will fall under the RCRA 2030 program, is recommended to ensure the appropriate level of focus and planning is in place for these sites within your portfolio.

Key Takeaways from the New 2030 Goals

- Sites with off-site migration and/or emerging contaminants and vapor intrusion risks will gain additional focus from EPA and state agencies.
- Redevelopment and long-term stewardship are key tenants of the new 2030 program; incorporating this perspective into remedial planning will reduce the likelihood of long-term agency scrutiny.
- There was no indication from the conference and our outreach to EPA that there will be repercussions from missing the 2020 Baseline goals. The EPA representatives we spoke with before the conference, the conference presenters, and the RCRA 2020 Baseline website refer to these as “aspirational goals” to complete for 95% of the selected 2020 facilities. Our outreach to EPA also indicated the 2020 Baseline deadline is not enforceable.

EHS Support will continue to track the RCRA 2030 goals and will provide updates as changes are announced. We recommend a review of your RCRA 2020 facilities to identify any sites that may be targeted for additional review or scrutiny (i.e., those with off-site migration or emerging contaminants) to ensure your teams are prepared to respond to questions or agency inquiries.

If you have questions or would like to discuss the RCRA 2030 Goals, contact Anton Heitger at 330-465-8207 or Anton.Heitger@ehs-support.com.

