



CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION

# RCRA Systems Analysis ("RSA") External Stakeholder Project: Objectives and Goals

November 6, 2008

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# RCRA Systems Analysis Background

- Conduct systems analysis of state's RCRA Hazardous Waste Management Program
- Analysis part of Commissioner's "Path of Least Resistance" initiative
- WEED conducted analysis of RCRA program's internal and external processes
- Internal analysis yielded similar efficiencies
- Presentation focuses on results of program evaluation to improve *external* processes

# RSA External Analysis: Outcomes

- Developed External Stakeholder Focus Team
- Strengthened working relationship with regulated community
- Concluded no overhaul needed, identified program concerns and conceptual solutions
- Developed five priority recommendations with implementation schedule
- Developed set of secondary priority items for further evaluation later
- Initiated public forum (“H-WAC”) & listserv

# External RSA Analysis: Program Concerns Identified

- Regulated community needs more and different information tools to understand “how to comply”
- Current IBR format difficult to interpret
- Enforcement process provides limited incentives to accelerate RTC
- Hard copy transfer slow and wasteful
- Regulated community needs certainty concerning TSDF closure procedures

# External RSA Analysis: Conceptual Solutions Identified

- Enhance DEP web site near term
- Explore developing i-COMPASS application for self-auditing a.k.a. “Turbo Tax for RCRA”
- Eliminate IBR format
- Explore providing certain incentives to accelerate RTC
- Expand use of electronic submissions and record keeping for RCRA required data
- Update *draft* TSDF Closure Plan Guidance

# External RSA Analysis: List of Priority Recommendations

- ❑ Matrix with five detailed recommendations
- ❑ Broken down into implementation phases
- ❑ Combines parts of program / WEED processes
- ❑ Shared DEP and H-WAC responsibility

# Priority Recommendation #1: Enhancements to Website & i-COMPASS

Phase I – Create “RCRA Help” web page

- Include self-audit checklists (DEP)
- List common violations (DEP)
- Develop FAQ with answers (DEP & H-WAC)

Phase II – Continue to spread word

- Hold periodic advisory committee meetings (H-WAC)

Phase III – Expand available information on “RCRA Help”  
web page

- Update Fact Sheets (DEP & H-WAC)
- Explore developing i-COMPASS (DEP)
- Evaluate DEP’s Self Audit / Self-Policing Policy (DEP)

# Priority Recommendation #2: Incorporation By Reference (“IBR”) Difficult to Interpret

- Eliminate IBR format as soon as feasible (DEP)
- Promulgate full text RCRA regulations with CT-specific provision included (DEP & H-WAC)
- Revised RCRA regulations should be brought to current with EPA’s latest promulgated regulations (DEP)

## Status (On-going):

- Anticipated Public Notice period May 2009 (H-WAC)
- Projected effective date of regulations 4Q2009 (DEP)



# Priority Recommendation #3: Provide Incentives for Accelerating Return to Compliance (“RTC”)

- Speed up enforcement process e.g., field NOV
- Explore set of qualification criteria to meet reduced penalty incentive and create penalty adjustment schedule (DEP & H-WAC)
- Develop templates to document RTC (DEP)

## Status (On-going):

- Seeking HWAC input on qualification criteria (H-WAC)

# Priority Recommendation #4: Expand Use of Electronic Submissions

- Identify electronic capabilities and submission requirements (DEP)
- Provide for electronic submission of manifests and paperwork requested during inspections (DEP)
- Allow for submission of “PIQ” style information exchange (DEP)
- Explore work toward electronic i-COMPASS certification for self-audits (DEP)

Status (On-going):

- Resource and technical constraints (DEP)

# Priority Recommendation #5: Enhancement to TSDF Closure Plan Guidance

## Phase I – Enhance existing closure guidance

- Needs current standards included and formalized (DEP)
- Post on DEP website (DEP)
- Spread word through HWAC (DEP & H-WAC)
- Post visual pathway to TSDF unit closure (DEP & HWAC)

## Phase II – Inventory RCRA Interim Status TSDFs

- Finalize list of TSDFs (DEP)
- Review financial assurance obligations (DEP)
- Outline alternatives to RCRA unit closure (DEP & H-WAC)

# Hazardous Waste Advisory Committee Mission

## Goals:

- Assist DEP to implement recommendations and provide training
- Continue open dialogue and information sharing
- Identify emerging issues and propose solutions
- Further develop secondary priority concerns
- Act as sounding board to provide feedback
- Better inform H-WAC participants
- Follow schedule to implement priority recommendations

# H-WAC Mission, continued

- Audience: Open to Public
- Projected Meeting Frequency: 3x per year
- Led by Steering Committee:
  - Host future meetings
  - Set agenda, logistics
  - Tasked to ensure benefits are realized
- Locations: Prior announcements to be made
- Stay Informed: Sign up to become a HWAC member — [www.ct.gov/DEP/HWAC](http://www.ct.gov/DEP/HWAC)
- Contact: WEED COMPASS Hotline 888-424-4193 or Mark Latham 860-418-5930 or [Mark.Latham@ct.gov](mailto:Mark.Latham@ct.gov)

## Implementation Schedule for High Priority Recommendations External Stakeholders Focus Team

External Stakeholders Focus Team / HW Advisory Committee

Task - High Priority Implementation Schedule

Task - High Priority Implementation Schedule	Projected Timeline	Schedule
<b>1. Enhancements to Web Page and iCOMPASS</b>		<b>November 2008 - February 2009</b>
Phase I - Create "RCRA Help" web page Move/Post current fact sheets (DEP) Post Self-Policing Policy (DEP) Assemble list of common violations (DEP) Finalize FAQs and web links (HWAC & DEP) Solicit email addresses for eCOMPASS (HWAC & DEP)	<b>Nov. 2008 - February 2009</b>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid red; padding: 2px;">Nov-08</div> <div style="border: 1px solid red; padding: 2px;">Nov-08</div> <div style="border: 1px solid red; padding: 2px;">Dec-08</div> <div style="border: 1px solid blue; padding: 2px;">Jan-09</div> <div style="border: 1px solid blue; padding: 2px;">Feb-09</div> </div>
Phase II - Spread word Develop/initiate e-COMPASS listserv (DEP)	<b>November 2008 - October 2009</b>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid blue; padding: 2px;">Nov-08</div> <div style="border: 1px solid blue; padding: 2px;">Nov-08</div> <div style="border: 1px solid red; padding: 2px;">Feb-09</div> <div style="border: 1px solid blue; padding: 2px;">Feb-09</div> <div style="border: 1px solid blue; padding: 2px;">Jun-09</div> </div>
<del>Kickoff HW Advisory Committee (HWAC &amp; DEP)</del> Initiate HW Advisory Committee (3x/yr) (HWAC & DEP) Phase III - Expand "RCRA Help" Update fact sheets per outreach schedule and post (DEP) Begin prep., research and cost analysis to build iCOMPASS (HWAC & DEP)	<b>May 2009 - October 2009</b>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid red; padding: 2px;">May-09</div> <div style="border: 1px solid blue; padding: 2px;">Jun-09</div> </div>
HWAC reports completion of eval. of Self-Audit Policy (HWAC & DEP)		
<b>2. Eliminate IBR Format</b>		
Begin legal review (DEP) Public Notice (HWAC & DEP) Expected effective date of HW Mgmt Regulations (DEP)	<b>Nov. 2008 - Dec. 2009</b>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid red; padding: 2px;">Nov-08</div> <div style="border: 1px solid blue; padding: 2px;">May-09</div> </div>
<b>3. Provide Incentives for Accelerating Returns to Compliance</b>		
Finalize set of Qualifications and penalty adjustment schedule (HWAC & DEP) Finalize template letters (DEP)	<b>February 2009 - July 2009</b>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid blue; padding: 2px;">Feb-09</div> <div style="border: 1px solid red; padding: 2px;">Jul-</div> </div>
<b>4. Expand Use of Electronic Submissions</b>		
Identify electronic capabilities and submission reqts (DEP) Complete electronic submission evaluation (DEP)	<b>May 2009 - October 2009</b>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid red; padding: 2px;">May-09</div> </div>
<b>5. DEP Enhancement to RCRA Closure Plan Guidance</b>		
Phase I - Revise/Post Closure Plan Guidance (DEP) Finalize pathway for RCRA closure (HWAC & DEP) Disseminate by eCOMPASS/post on web site (DEP)	<b>June 2009 - October 2009</b>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid red; padding: 2px;">Jun-09</div> <div style="border: 1px solid blue; padding: 2px;">Jun-09</div> </div>
Phase II - Inventory TSDs (DEP) Finalize list of TSDs (DEP) Review financial assurance obligations (DEP)	<b>June 2009 - August 2009</b>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid red; padding: 2px;">Jun-09</div> </div>

Independent DEP Tasks Indicated

HW Advisory Committee Involvement/Tasks Indicated