

# Post-Closure Care at Hazardous Waste Units : U.S. EPA Office of Inspector General Project Notification



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The United States Environmental Protection Agency ("EPA") Office of Inspector General ("OIG") issued a March 23rd Project Notification titled:

*Post-Closure at Hazardous Waste Units Closed with Waste in Place ("Notification")*

See Project No. OA&E-FY19-0323.

The *Notification* is transmitted to Peter Wright, EPA's Assistant Administrator for Office of Land and Emergency Management from Tina Lovingood, Director, Land Cleanup and Waste Management Directorate, OIG Office of Audit and Evaluation.

The stated objective is to evaluate:

. . . whether the EPA's oversight of hazardous waste units closed with waste in place verifies continued protection of human health and the environment.

The Resource Conservation and Recovery Act ("RCRA") Subtitle C regulations require certain actions when a hazardous waste management ceases receipt of waste at the end of its active life. The unit must be remediated, monitored and maintained in accordance with the closure and post-closure care requirements. These requirements are found in the closure and post-closure sections of the RCRA regulations.

Closure of units or facilities can happen in one of two ways:

- A clean closure (receipt of all waste from the unit and decontaminated to remove all equipment, structures and stranded soil)
- A closure with waste In place (closure method for facilities or units that cannot meet the clean closure requirements [i.e., all waste and contamination could not be removed])

The closure in place method is being addressed by the *Notification*.

The *Notification* states OIG plans to conduct work at the EPA Office of Resource and Conservation Recovery that is within the Office of Land and Emergency Management. It will also conduct work at selected EPA regions and states.

The "anticipated benefits" of the projects are stated to include:

1. the assurance of continued protection of the public from exposure to hazardous substances; and

2. the identification of potential unfunded liabilities so that EPA can appropriately plan for future resource requirements and share these with the public.

Note that the Arkansas Department of Energy and Environment – Division of Environmental Quality has been delegated the RCRA Subtitle C program. This delegation includes the closure and post-closure requirements. EPA has previously issued, in April 2010, a RCRA Closure Handbook. This document is described as:

. . . a guidance document prepared for hazardous waste facilities undergoing closure, by the Hazardous Waste Division of the Arkansas Department of Environmental Quality.

A link to the OIG notification can be found [here](#).