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# Treatment, Storage, and Disposal Facilities/Climate Risks: U.S. Government Accountability Office Report Recommending U.S. Environmental Protection Agency Actions

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The United States Government Accountability Office (“GAO”) issued a November 2024 report titled:

*Hazardous Waste: EPA Should Take Additional Actions to Encourage Treatment, Storage, and Disposal Facilities to Manage Climate Risks (“Report”).*

See GAO-25-106253.

The Report is addressed to the following United States Senators:

- Senator Tom Carper
- Chairman, Committee on Environment and Public Works.
- Senator Cory A. Booker

GAO was asked to review the United States Environmental Protection Agency’s (“EPA”) role in addressing climate risks to the over 1,000 United States facilities that treat, store, and dispose of Resource Conservation and Recovery Act (“RCRA”) hazardous waste. The focus of the study was the harm that can occur to human health and the environment in the event of releases.

GAO states that federal data indicates that flooding, wildfires, storm surge, and sea level rise could affect more than 700 hazardous waste treatment, storage, and disposal facilities. Approximately 68% of these facilities are stated to be located in areas with one or more of the referenced hazards that could be “exacerbated” by climate change.

The Report examines:

- Extent to which facilities are located in areas with selected natural hazards that may be exacerbated by climate change.
- Extent to which EPA requires or encourages authorized states and facilities to manage risks to human health and the environment from climate change.
- Challenges that EPA, authorized states, and facilities face in managing climate risks.

GAO recommendations to EPA include the following:

- The Assistant Administrator of the Office of Land and Emergency Management should develop and provide training and technical assistance to help EPA regions and authorized states implement recent guidance on using existing authorities and requirements to manage climate risks to facilities.
- The Assistant Administrator of the Office of Land and Emergency Management should use its upcoming rulemaking to seek feedback from authorized states, facilities, and other stakeholders to assess whether its recent guidance is sufficient or revising regulations would be necessary to clarify requirements for managing climate risks to facilities.
- The Assistant Administrator of the Office of Enforcement and Compliance Assurance should issue guidance to clarify RCRA authorities and requirements for managing climate risks to facilities as part of authorized states' and EPA regions' RCRA compliance and enforcement efforts.
- The Assistant Administrator of the Office of Land and Emergency Management, in consultation with EPA regional offices, should develop and implement monitoring metrics and assess whether and how authorized states and facilities are managing climate risks to facilities in RCRA permitting and oversight efforts.
- The Assistant Administrator of the Office of Enforcement and Compliance Assurance, in consultation with EPA regional offices, should develop and implement monitoring metrics and assess whether and how authorized states and facilities are managing climate risks to facilities in RCRA compliance monitoring and enforcement efforts.
- The Assistant Administrator of the Office of Land and Emergency Management, together with other relevant EPA offices and EPA regions, should assess the current RCRA facilities standards and requirements to determine if they will be sufficient to manage climate risks and, if one or more of them need to be updated to ensure they remain protective of human health and the environment, develop a plan for any revisions or updates.
- The Assistant Administrator of the Office of Land and Emergency Management should issue guidance to EPA regions, authorized states, and facilities on how to manage climate change risks as part of RCRA program permitting efforts for facilities and identify or provide related data, training, or tools.
- The Assistant Administrator of the Office of Enforcement and Compliance Assurance should issue guidance to EPA regions, authorized states, and facilities on how to manage climate change risks as part of RCRA program compliance and enforcement efforts for facilities and identify or provide related data, training, or tools.
- The Assistant Administrator of the Office of Land and Emergency Management, together with other relevant EPA offices and regions, should identify and communicate additional financial resources and assistance from federal resilience funding sources that may be available to authorized states and facilities.

A copy of the GAO Report can be downloaded [here](#).