

**Data Quality Record for Updated Permits at RCRA  
Hazardous Waste Facilities Long-Term Performance Goal**

**Long-Term Performance Goal Text:** By September 30, 2026, increase the percentage of updated permits at RCRA facilities to 80% from the FY 2021 baseline of 72.7%.

**Corresponding Annual Performance Goal:** Number of updated permits issued at hazardous waste facilities.

**Goal Number/Objective:** Goal 6/Objective 6.2

**NPM Lead:** Office of Land and Emergency Management (OLEM)

**1a. Purpose of Long-Term Performance Goal:**

The intent of the reporting of this long-term performance goal (LTPG) is to document the percentage of RCRA hazardous waste permits that are not past expiration and have been updated through a permit renewal (or are not past the first permit term/expiration). The aim is to increase the percentage of updated permits over time. A positive trend over several years will convey that larger portions of the existing permits are being kept up to date with renewals and that those permits are not using outdated permit conditions past the permit expiration. During the renewal process, the permit will incorporate updated regulations adopted by the state agency. Also, the renewed permit can include the use of newer, more efficient, and more effective technology.

**1b. Performance Measure Term Definitions:**

Permits: Refers to RCRA hazardous waste permits, which have a maximum 10-year permit term (but many states use more stringent 5-year permit terms). Permits can be administratively continued after the expiration date if a timely renewal application has been submitted to the Agency, but these permits are not “updated permits.” The permitted facilities are identified on the RCRAInfo “Permit Renewals Workload Report,” and specific codes indicate if they are permitted, on the workload, and if past expiration.<sup>1</sup> The report tracks the facility’s permit status.

Updated Permits: RCRA hazardous waste permits (identified above) that are not past the expiration date. They have been renewed (or have not exceeded their original expiration date). Renewal is a RCRA hazardous waste permit that has been reissued and the permit term has been extended with a new permit expiration date.

**1c. Unit of Measure:**

The percentage of updated permits at RCRA hazardous waste facilities.

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<sup>1</sup> The RCRAInfo “Permit Renewals Workload Report” identifies this set of permitted facilities. The report uses event codes to identify if a facility is on/not on the permitting workload and if it is past the expiration. The identification of whether the facility is included on the “permitted” facility list is mainly based on the legal and operating status codes for an operating permit or a post-closure permit. Note that it does not include all operating status codes; some facilities with a permit are excluded in the report (e.g., if they are also coded as clean closed).

## **2a. Data Source:**

RCRAInfo is the primary (original) source of data. The information is from the “Permit Renewals Workload Report” within RCRAInfo for the status of permitted facilities on the workload. Regarding the frequency and timing of the data, the states have different agreements with EPA regions to provide data to RCRAInfo within a specified timeframe. The agreements are typically within a month of the RCRA activity or are specific number of days (20 is common) for the prior month’s results. Regardless of the specified times, states have been willing to provide end-of-year (EOY) results for permitting measures by the end of the third week in October (this has been the practice for about a decade or more). Data are collected for units at facilities, and the unit data are assessed to determine the facility status (if it is permitted, on workload, or if past expiration).

## **2b. Data needed for interpretation of (calculated) Performance Result:**

Universe: The permitted facilities (as calculated in the RCRAInfo “Permit Renewals Workload Report”) comprise the “universe” and it can change over time. For example, new initial permits issued would raise the total number, and actions such as clean closure or termination of permit would reduce it. The universe for the start of the goal is 1,313 facilities as of EOY FY 2021 (11-1-21 calculations).

Baseline: The starting point for the percentage of updated permits is also referred to as the baseline. The strategic plan tracks the progress in five fiscal years: 2022 through 2026. The baseline would be the status just prior to the start of tracking in FY 2022. The EOY FY 2021 status is 72.7% updated permits, and this result was recorded on November 1, 2021. Each year, the end-of-year results will be compared to prior end-of-year results, and the Office of Resource Conservation and Recovery will use the information to assess the progress towards the goal of 80%.

Permitted facilities: The RCRAInfo Permit Renewals Workload Report identifies this set of facilities based on legal and operating status and on event codes. The descriptions are found at the following site under Nationally-Defined Values, <https://rcrainfo.epa.gov/rcrainfo-help/application/index.htm#t=Introduction.htm>.

- Legal and Operating Status Codes:
  - Legal status of PI (Permitted), PC (Post-Closure Permitted), or PM (Pre-Mod Authorization)
  - Operating status of OP (Operating, Actively Managing RCRA-Regulated Waste), IN (Inactive/Closing, but not yet RCRA Closed), CP (Closed With Waste in Place), NE (Newly Transferred Ownership to this Site), CA (Referred to Corrective Action for Closure/Post-Closure), CN (Constructed, Not Yet Managing Hazardous Waste), UC (Under Construction), BC (Before Construction), or DC (Delay of Closure)
  - Event Codes (also determine when a facility is renewed): OP/PC200 (Final Determination), OP/PC270 (Permit Expiration Date), OP/PC316 (Permit Cannot Be Renewed at this Time)
- Permits that are up to date (not past expiration): These are: (1) permits that have been renewed (new OP/PC200) and have a new permit expiration date in the future (5-10 years is typical); and (2) the small set of initial permits that are not past the first expiration date (OP/PC 270). A

permit is “up-to-date” (or “updated”) if it is not past the max expiration date, for example, a permit in the ninth year of the permit term is still “updated,” but will soon be on the workload for a permit renewal. Permits may be renewed multiple times. The permit status is counted at the facility level.

### **3. Calculation Methodology:**

The “percentage of updated permits” is calculated in the RCRAInfo report as follows:

*Numerator is the # of permitted facilities that are not past the max permit expiration date ÷*

*Denominator is the total # of permitted facilities = percentage of updated permits.*

The starting point calculation for FY 2021 EOY results is as follows:

*954 updated permits ÷ 1,313 total permitted facilities on workload = 72.7 %.*

Each data element for the calculation is described above.

### **4. Quality Assurance/Quality Controls:**

The Quality Assurance/Quality Controls for “nationally-defined values” in RCRAInfo data are the same for this long-term performance goal as for other prior and existing performance measures that use RCRAInfo data. Refer to the links below for existing QA/QC for RCRAInfo data. (Note - There is a higher data quality standard for “nationally-defined values,” and the calculation for this LTPG needs only nationally-defined values.)

Memo from Barnes Johnson 8/1/2016 on data quality:

<https://rcrainfo.epa.gov/rcrainfo-help/application/assets/docs/BarnesJohnsonFinancialAssuranceMemorandum.pdf>

Information about data responsibility:

<https://rcrainfo.epa.gov/rcrainfo-help/application/index.htm#t=Introduction.htm>

### **5. Data Limitations/Qualifications:**

EPA relies on the state program to enter the data as described in the links used for #4 above. EPA regional offices have agreements with the states to enter the accurate data in a timely manner, but there will be some inconsistencies to address. EPA will look for inconsistencies prior to mid-year and end-of-year and will discuss and confirm draft results with the regions.

### **6. Technical Contact:**

Tab Sommer (OLEM), 202-566-0363

### **7. Certification Statement/Signature:**

**I certify the information in this DQR is complete and accurate.**

**PDAA Signature** Original signed by Barry N. Breen **Date** 5/19/2022