

# **DEPARTMENT OF ENVIRONMENTAL QUALITY**

## **DIVISION OF SOLID AND HAZARDOUS WASTE RCRA PROGRAM - PERFORMANCE PARTNERSHIP FY 2011**

### **INTRODUCTION**

This section addresses the goals and related performance measures for the hazardous waste program administered by the Division of Solid and Hazardous Waste (the Division) in coordination with the U.S. Environmental Protection Agency EPA Region 8 (EPA) under this Performance Partnership Agreement (PPA). The section is organized by the same major categories as those established by the Department of Environmental Quality and are as follows:

- Environment
- Customer Service
- Partnership with Federal, State, Local, and Tribal Governments
- State-based Regulation of Environmental Programs
- Employees
- Enhance Policymakers' (Legislature, other Elected Officials and Boards) Understanding of Environmental Issues

Under these categories, strategic goals and measures are presented, followed by annual goals and measures. The strategic goals and measures provide overall, continuing direction and focus for the annual goals and measures. The annual goals and measures addressed by this document incorporate the goals and priorities of EPA Region 8 as outlined in the region's following two guidance documents:

- RCRA Program Guidance for FY 2011; and
- Final Guidance FY 2011, Performance Partnership Agreements, Office of Enforcement, Compliance, and Environmental Justice.

### **I. ENVIRONMENT**

This category encompasses the following EPA program priorities:

- Waste Minimization/Pollution Prevention/Recycling (Resource Conservation Challenge)
- Safe Waste Management (Operating Permits, Closure, Post-Closure, and Corrective Action)
- Compliance and Enforcement
- Information Management (RCRAInfo)
- Environmental Justice

## **DIVISION STRATEGIC GOAL:**

Protect human health and safeguard the environment by assuring the safe management and proper handling, transportation, treatment, storage and disposal of solid and hazardous wastes, including used oil. Provide assistance and information to industry as a means to promote waste minimization and pollution prevention as the preferred waste management strategy. Promote implementation of the core elements of the Resource Conservation Challenge (RCC). As a voluntary effort to establish working partnerships among EPA, states, industry, and other stakeholders, the RCC is designed to find more flexible as well as protective ways to meet the overall intent of RCRA to conserve national resources and energy.

### **Measures:**

- a. Provide pollution prevention (P2) and waste minimization assistance and resources. Industry and other stakeholders actively implement RCC program elements. Jointly evaluate the currently available hazardous waste generation data, including the state hazardous waste minimization profile compiled by EPA, to identify opportunities to improve utilization of this information and achieve greater results in waste minimization activities.
- b. Provide timely and effective enforcement/permitting responses based upon a balance of priorities and available resources.
- c. Provide for innovative solutions to solid and hazardous waste stabilization and cleanup activities (non-Superfund sites) in order to focus on results and the potential for redevelopment of remediated sites. Foster voluntary cleanup actions where appropriate. Promote an open dialogue among cleanup action stakeholders, including public/community interests.

## **1. POLLUTION PREVENTION / WASTE MINIMIZATION / RECYCLING / RCC <sup>P2</sup>**

Pollution Prevention, waste minimization and recycling are listed first to reflect their position as the "strategies of first choice" in the hierarchy of waste management. Nationally, hazardous waste programs are focusing their efforts on the Resource Conservation Challenge (RCC), an effort to minimize waste and conserve natural resources and energy by managing materials more efficiently. The RCC is built on working partnerships among EPA, states, industry, and other stakeholders. There are four (4) priority areas under the RCC, including increasing the Recycling of Municipal Solid Waste, Industrial Materials Recycling, Priority and Toxic Chemical Reductions, and Green Initiatives involving Electronic Waste.

EPA-Region 8 is continuing to build programs in each of these areas and provide resources to support the state. The Division will implement core elements of the RCC and provide direction and support as resources and priorities allow. The Division expects to:

- Promote and support efforts and activities related to hazardous waste minimization

and pollution prevention;

- Provide direction and information to assist industry in integrating waste minimization practices into their processes; and
- Integrate waste minimization principles into activities of the Division staff.

Additionally, the Division will continue to administer successful recycling programs for the following key program areas:

-- Waste Tire Recycling (as part of the Industrial Materials Recycling effort)

-- Used Oil Recycling (as part of the Priority Chemicals Reduction effort)

### **Municipal Solid Waste Recycling (MSW)**

EPA's emphasis on recycling and waste diversion seeks to increase the region's recycling rates and divert waste from land disposal. EPA plans to implement measures to improve tracking and reporting of MSW recycling rates, including the potential to reflect any benefits associated with energy conservation and greenhouse gas reduction. During FY 2011, the Division plans to support these efforts, as resources and priorities allow.

### **Industrial Materials Recycling (IMR)**

The Division will continue implementation of the successful waste tire recycling program in partnership with the waste tire industry, local health departments, local government officials, and landfill operators. The Division will track and evaluate the volume of waste tires recycled and the amount of state reimbursements paid in support of waste tire recycling.

Region 8 will continue its efforts to increase the environmentally safe reuse and recycling of industrial materials (with a focus on coal combustion products, foundry sands, and construction and demolition debris) in building construction, transportation, and agriculture.

The Region will support several national voluntary partnership programs to meet these goals, including the Coal Combustion Products Partnership (C2P2) and the Industrial Materials Construction Initiative. EPA will continue to provide information and technical resources to Utah to support increased industrial materials recycling.

### **Hazardous Waste Minimization, Priority & Toxic Chemical Reductions**

The Division will continue to track and evaluate the amount of used oil collected for recycling, particularly used oil collected from Do-it-yourselfers (DIYers). Continue successful educational program throughout the state on the environmental and public health benefits and the availability of used oil collection and recycling opportunities. Promote and support a broad base of used oil industry, used oil collection centers, local officials, retailers, and the public as active participants in community-based used oil steering committees. Steering committees serve to educate and promote the collection and recycling of used oil on

a community level.

The Division will continue its pollution prevention policy implementation by developing and providing waste minimization/pollution prevention (P2) information and technical assistance through various sources to businesses that generate hazardous waste, the general public, and program staff. Help maintain and supply the division Web site, as necessary, with informational resources regarding P2, waste minimization, source reduction, and recycling.

The Division will identify and evaluate supplemental environmental projects (SEPs) that are part of an enforcement action settlement to determine the contribution to waste minimization and pollution prevention. Supplemental environmental projects contributing to waste minimization/pollution prevention will be reported to EPA Region 8.

EPA is continuing its efforts to reduce identified priority chemicals in hazardous waste streams and increasing the amount of safe hazardous waste recycling practices. EPA (headquarters) has developed a focus on 31 RCRA priority chemicals and some tools to assist states and Regions.

The Division and Region 8 will work together in establishing incentives for new or additional state activities focused on priority chemicals, including grants, training, technical assistance, voluntary partnerships, award programs, and other incentives. When possible, the state will incorporate P2/waste minimization requirements into hazardous waste permits or in enforcement settlements.

### **Electronics/Green Initiatives**

The Division will continue to dedicate staff resources to implement an increased effort in the RCC challenge area of electronic product stewardship, particularly "e-scrap" recycling. The Division will participate in a partnership of stakeholders as a means to meet the growing challenges and issues associated with handling used electronic equipment and components. This may include activities to expand outreach efforts and educational media as opportunities for improving electronics recycling continue to open up and as the collaborative partnership grows.

## **2. SAFE WASTE MANAGEMENT**

### **PERMITS, CLOSURE, POST-CLOSURE**

Maintain effective used oil and solid and hazardous waste permitting and closure/post closure programs. The Division and, as necessary, EPA will work together to achieve this goal; where the Division and EPA priorities differ, appropriate discussions between both agencies will be conducted to reconcile such differences. EPA will provide technical assistance, training, and other support where appropriate.

In recognition of past permitting accomplishments and the ongoing workload in this program area, the following measures apply to FY 2011 performance activities.

- a. Maintain accurate information of the universe and status of hazardous waste facilities subject to closure requirements, post-closure permits, operating permits—including permit renewals, and financial assurance requirements (see Information Management section below for more details). Provide the preceding information through automated data systems (RCRAInfo) for all required data elements by the 20<sup>th</sup> of the month following the activity.
- b. Hazardous Waste Program - Provide appropriate closure/post-closure and permit response as dictated by case-by-case specifics, regulatory/statutory requirements, including alternate mechanisms as allowed under the post-closure rule, as adopted by the Division, permit conditions, and program priorities and goals. Appendix 2 of EPA's RCRA Program Guidance for FY 2011 identifies the various hazardous waste program measures to be reported by the Division with respect to hazardous waste permits, closure and post-closure. Targeted FY 2011 permitting, closure, and post-closure program activities at specific facilities are identified in the appropriate section of RCRAInfo utilizing the scheduled date for related events. Additionally, a separate table identifying the commitments for FY 2011 for permitting, closure, and corrective action for the hazardous waste program is included. See table entitled “FY 2011 Hazardous Waste Program Commitments for UTAH.”

All of the remaining hazardous waste management units requiring an operating permit are subject to the Subpart X requirements and standards for open burning/open detonation of explosive wastes. For FY 2011, the Division will continue to make progress toward completing the permitting process for these particular units.

- c. Conduct periodic analysis of effectiveness of closure/post-closure and permitting activities utilizing program tracking information (such as RCRAInfo, and the division databases) and conducting briefings with staff for ongoing coordination. Federal and state data systems and staff briefings will help to identify areas of progress and areas of concern. Tracking information will be available to EPA. Updates to future strategies for accomplishing such activities will be made, as necessary, as part of the FY 2012 planning process in order to account for the GPRA goals.
- d. EPA will provide assistance, as requested by the Division, regarding the application of MACT standards for hazardous waste combustion facilities.

## CORRECTIVE ACTION

Maintain an effective corrective action program, including stabilization of environmental releases

and clean up of contaminated hazardous waste sites. DSHW and EPA will work together to achieve this goal; where DSHW and EPA priorities differ, appropriate discussions between both agencies will be conducted to reconcile such differences. EPA will provide technical assistance, training, and other support where appropriate.

**Measures:**

- a. Maintain and update, as necessary, facility specific corrective action information for hazardous waste facilities subject to corrective action, including site assessment, stabilization (accounting for health and environmental risk control measures), and regular corrective action process activities through staff interaction, correspondence and/or automated data systems (RCRAInfo) with a focus on key milestones, as identified in the following paragraphs. For RCRAInfo, all required data elements will be entered by the 20th of the month following the activity in order to maintain the usefulness and quality of the reported data.
- b. Provide appropriate corrective action response as dictated by case-by-case specifics, regulatory/statutory requirements, permit conditions, or program priorities. Emphasis is on high priority facilities in order to address and control human exposures and the migration of contaminated ground water. Appendix 2 of EPA's RCRA Program Guidance for FY 2011 identifies the various hazardous waste program measures to be reported by the Division for corrective action. Targeted FY 2011 corrective action program activities at specific facilities are identified in the appropriate section of RCRAInfo utilizing the scheduled date for related events. Additionally, a separate table identifying the commitments for FY 2011 for permitting, closure, and corrective action for the hazardous waste program is included. See table entitled "FY 2011 Hazardous Waste Program Commitments for UTAH."
- c. Conduct periodic analysis of the effectiveness of corrective action activities and update, as necessary, future strategies for accomplishing such activities as part of the FY 2012 planning process in order to account for the applicable corrective action GPRA goals. The analysis will include the FY 2011 goals of selecting (site-wide final remedies (CA400) and completing the construction of site-wide final remedies (CA550) at RCRA baseline facilities. This analysis may include the following environmental indicators: the number and percentage of handlers subject to corrective action with (1) human exposures under control (CA725) (please note this EI is complete for all baseline facilities), and with (2) migration of contaminated groundwater under control (CA750). The Division will prepare, complete, and submit to EPA Region 8 appropriate documentation of accomplishments of the above indicators.
- d. The Division will continue to work with EPA Region 8 during FY 2011 on a strategy for meeting the 2020 Corrective Action goal of having remedies constructed (CA550) at all 2020 baseline facilities. The Division has 24 facilities on its 2020 baseline.

### 3. COMPLIANCE AND ENFORCEMENT

Evaluate compliance status of solid waste, hazardous waste, and used oil handlers and facilities and foster an ongoing commitment to compliance and environmental protection through on-site inspections and other compliance assistance activities.

#### **Measures:**

- a. Develop the FY 2011 inspection schedule and submit to Region 8 by September 30, 2010. The Region will develop its FY2011 inspection schedule and submit to the Division by October 30, 2010. The selected schedule will incorporate, as appropriate, state, regional, and national priorities. The selected schedule will also include 20% of the large quantity generator (LQG) universe as determined and agreed to by the Division and EPA using RCRAInfo as of September 1, 2010. Any RCRA Section 6002 federal procurement compliance evaluations by EPA may be conducted as part of regularly scheduled inspections of federal facilities in which EPA participates with the Division and will be coordinated in advance with the Division.
- b. Conduct inspections at small quantity generators (SQGs) and conditionally exempt small quantity generators (CESQG). SQGs and CESQGs to be inspected will be identified in the inspection schedule developed by September 30, 2010.
- c. The Region commits to work with the Division to identify 2 TSDFs and 6 LQGs which the Region will inspect as lead. The LQGs will be identified from the national priority sectors, illegal recyclers, entities with violations in more than one state, environmentally sensitive environment, unpermitted surface impoundments, coal combustion waste facilities, areas of environmental justice concerns and particularly recalcitrant violators.
- d. Complete targeted inspections identified in the FY 2011 inspection schedule by September 30, 2011.
- e. Participate in federal industry sectors initiatives. Conduct compliance assistance evaluations following the Division's small business assistance program.
- f. Provide facility specific compliance and enforcement information through the proper and timely entering of EPA and the Division program data into RCRAInfo and ensure the quality of all reported data.
- g. Conduct periodic analysis of effectiveness of evaluation activities. This will consist of staff and/or facility contact and data systems reports to note areas of progress and areas of concern. Apply, as appropriate, national or state compliance/enforcement performance measure methodologies and/or compliance rate determinations as a means to enhance the reporting of key program accomplishments. A copy of the report(s) will be shared with the Region upon completion.

- h. A regional implementation policy of the CERCLA Offsite Rule (OSR) has been established and will serve as the basis for the Region's implementation of the OSR; implementation for any sites in Utah will be coordinated with the Division.
- i. Report the outcome of citizen complaint referrals on a quarterly basis. Reporting shall be accomplished via email or other written communication.
- j. Consider economic factors in determining penalties for violations.
  - i. Use EPA economic computer models to assist in evaluation.
  - ii. Use maximum flexibility when negotiating consent agreements to include consideration of financial viability of the regulated party.

#### **4. INFORMATION MANAGEMENT**

Report key program accomplishments via automated data systems (RCRAInfo) or by direct correspondence which accurately reflects the status of the RCRA handler universe. The Division will continue to maintain timely, accurate and complete data, including compliance and enforcement data, and federally required data fields in RCRAInfo. EPA will work with the Division to clarify or resolve universe issues and provide training and technical assistance when requested. Program areas will include permitting, compliance/enforcement, closure/post-closure, corrective action, and waste minimization. With the release of Version 4, the Division will continue to work with EPA Region 8 to be able to provide the required financial assurance and corrective action information in the new modules in RCRAInfo. The Division and EPA will utilize RCRAInfo and other Division data systems for assessing accomplishments in these program areas. Data will be entered into RCRAInfo for all required data elements, including compliance assistance visits (CAVs), by the 20<sup>th</sup> of the month following the activity in an effort to maintain the timeliness, accuracy, and completeness of the program data.

Significant noncompliers (SNCs) will be identified and reported to EPA, utilizing appropriate RCRAInfo codes, as agreed upon by the Division and EPA.

Continue the electronic storage of all incoming documents in the Department's document system. Maintain information quality through monitoring of staff quality control activities.

#### **5. ENVIRONMENTAL JUSTICE (EJ)**

The Division recognizes that the incorporation of environmental justice into the RCRA regulatory program is a priority for EPA Region 8. Upon request, EPA will provide the Division access to Geographic Information System (GIS) environmental justice tools and share information about any available environmental justice resources in an effort to address EJ matters. The Division will utilize EPA staff and GIS resources, as appropriate, in the

implementation of the state hazardous waste program.

**Measures:**

Incorporate, as appropriate, environmental justice considerations in administration of the program.

**DIVISION STRATEGIC GOAL:**

Provide leadership in Utah, the western region, and nationally to influence national policies on waste management activities.

**Measures:**

- a. Division staff will attend and actively participate in regional and national organizations committees and task forces such as with WGA, ASTSWMO, and EPA to provide maximum input in the development of waste management policies and issues.
- b. Staff will submit comments which reflect Utah policies on proposed federal solid and hazardous waste programs.

Ensure staff availability to attend regional and national policy meetings and to participate on appropriate committees.

**Measures:**

- a. Determine success of legislative, budget, and policy initiatives identified as priorities.
- b. Appropriate input is given directly by state and through organizations to decision makers on priority issues.

**II. CUSTOMER SERVICE**

**DIVISION STRATEGIC GOAL:**

1. The Division will operate and function as an internal and external customer-oriented agency by focusing on customer service, building trust, and problem-solving through cooperative efforts in all Division activities and partnerships.

**Measures:**

- a. Solicit and evaluate customer feedback.
- b. Provide decisions and services within mutually agreed-upon time frames which

best meet customers' needs and provide appropriate environmental protection.

- c. Help the public understand applicable regulations and Division procedures and activities in a courteous and professional manner.
  - d. Provide information in a timely manner.
  - e. Publish and distribute any program newsletters, as appropriate, to internal and external customers.
  - f. Provide technical and regulatory assistance to industry, special interest groups, schools, local governments, etc. throughout the year.
  - g. Establish a good relationship between Division personnel and customers interested in or concerned with program activities and related regulations.
  - h. Look for ways to improve Division business processes.
2. Permitting, corrective action, and compliance/enforcement processes will involve continuous customer input.

**Measures:**

- a. Involve the public as required by statute, regulation, or state public participation policies so that access to public records during public comment periods will allow appropriate time for public participation.
- b. Provide surveys to external customers involved in the permitting and/or inspection process(es) seeking specific feedback on process successes as well as process improvements.
- c. Assess internal processes to identify areas for improvement.
- d. Publish permit information and fact sheets regarding permit modifications and permit issuances on the Division's Web site.
- e. Provide opportunity for public participation via email.
- f. Address complaints and information requests in a timely manner.

**III. PARTNERSHIP WITH FEDERAL, STATE, LOCAL AND TRIBAL GOVERNMENTS**

**DIVISION STRATEGIC GOAL:**

- 1. Improve the effectiveness and efficiency of statewide delivery of environmental services by strengthening relationships with all levels of government.

**Measures:**

- a. Work with federal, state, local (including local health departments), and Tribal governments and provide information to plan for and manage the environmental impacts of growth.
  - b. Provide technical and non-technical training to local health departments, industry, local governments, or other groups.
  - c. Focus on teamwork and partnership in identifying and resolving problems.
  - d. Receive and evaluate feedback on success of partnerships.
  - e. Address key problems identified by partners and develop and implement solutions.
  - g. Evaluate effectiveness of the Performance Partnership Agreement in developing a state/federal partnership, coordinating delivery of services, and obtaining adequate resources.
2. Improve the efficiency of statewide delivery of waste management services by strengthening relationships with local health departments and EPA.

**Measures:**

- a. Identify key waste management problems and implement a solution in partnership with local health departments, local government, the Division, and EPA.
3. Establish positive relationship between the Division and local health departments.

**Measures:**

- a. Notify local health department of any Division activities occurring in their areas of jurisdiction.
  - b. Ensure directors of local health departments, or their designee, are copied on correspondence related to the Division activities associated with their area of jurisdiction.
  - c. Meet with each local health department at least annually.
4. Inform local governments concerning the Division programs and activities in order to be able to comply with appropriate regulations and plan for future needs.

**Measures:**

- a. Participate, when invited, with local government organizations, at regular seminars and training meetings, as well as respond to individual requests for information.
  - b. Solicit input from local governments regarding proposed rules which could impact their areas of jurisdiction.
5. Enhance the State/EPA partnership.

**Measures:**

- a. Jointly develop and maintain the MOA, the enforcement agreement, quality assurance plan for environmental data collection, and other operating guidance. In FY2011, the Division and EPA will review and revise, if necessary, the MOA.
- b. Jointly plan and prioritize program goals, objectives and activities which address joint priorities. The Division and EPA will work together on PPA development, program activities and priorities, inspection strategies, planning meetings, program reviews, and national assessments of major program elements.
- c. Maintain a high level of coordination and cooperation between the Division and EPA staff to assure successful and effective administration of the program. Coordination includes evaluation of desirable technical support and targets for joint efforts/work sharing.
- d. Maintain frequent/open communication on routine matters, changes in program capability, legislation, and resource levels, emergency situations, and other key activities as described in the MOA. EPA and the Division will hold regular meetings or conduct conference calls to share information, identify and solve problems, and engage in short-term planning efforts.
- e. Jointly identify state training and technical assistance needs. EPA will make training and technical assistance available to the state and will work towards improving the capability to provide high quality assistance.
- f. Oversight will be conducted by EPA of the Safe Waste Management, Corrective Action and Program Management functions according to the Performance Standards and Oversight Procedures (PSOP). EPA will discuss specific oversight activities with the Division during the course of FY 2011, including whether reviews will be conducted in real time or after the fact. Activities related to RCC, Pollution Prevention and Waste Minimization are considered voluntary and are not subject to oversight; these activities will be included in the End of Year Report to illustrate progress toward national goals.
- g. Oversight review of the Division's enforcement program using the OECA State Review Framework will be performed by EPA.

## **IV. STATE-BASED REGULATION OF ENVIRONMENTAL PROGRAMS**

### **DIVISION STRATEGIC GOAL:**

1. Develop statutory and regulatory authorities to qualify for continued program authorization.
2. Adopt new hazardous waste, solid waste, and used oil rules promulgated by EPA to maintain regulatory equivalency and program authorization.
3. Identify new federal hazardous waste rules promulgated during cluster period ending June 30, 2010 and which require adoption by the Solid and Hazardous Waste Control Board
4. Submit updated authorization applications to EPA to maintain hazardous waste program authorization as needed.

## **V. EMPLOYEES**

### **DIVISION STRATEGIC GOAL:**

1. Maintain a climate in which employees can function to their fullest potential, be recognized for their quality work, and accomplish the goals of the Division.

#### **Measures:**

- a. Recognize Division personnel for their quality work and accomplishments.
  - b. Reflect strategic and annual goals in individual performance standards.
  - c. Recognize the value of teamwork and coordination with stakeholders.
2. Help employees commit to the success of the Division and recognize their professional responsibility and accountability in meeting the needs of the organization.
  3. Provide appropriate training to employees to increase and foster professional development.
  4. Solve problems through cooperative effort of Division staff.
  5. Provide leadership in Utah, the western region, and nationally to influence national policies on waste management activities.
    - a. Attend and participate in WGA, NGA, ASTSWMO, and EPA committees, including task forces, etc., to provide maximum input in development of policies.

## **VI. ENHANCE POLICY MAKERS' (LEGISLATURE, OTHER ELECTED OFFICIALS,**

## **AND BOARDS) UNDERSTANDING OF ENVIRONMENTAL ISSUES**

### **DIVISION STRATEGIC GOAL:**

1. Facilitate policy makers as pro-active participants in shaping environmental policy.

#### **Measures:**

- a. Inform legislators, other elected officials, and Board members of important environmental policy, budget, and regulatory issues as appropriate.
  - b. Develop relationships with policy makers and increase their understanding of environmental issues enhanced.
2. Develop partnerships and maintain good lines of communication with policymakers.

#### **Measures:**

- a. Keep policy makers informed on program issues that require policy development.
  - b. Support and participate in policy and regulatory development efforts.
3. Provide educational, rulemaking and enforcement information to Solid and Hazardous Waste Control Board members in the form of documents and presentations to keep members informed and updated on key activities within the Division.

#### **Measures:**

- a. Provide required information for the Board packets as required by the Division and within the required time frames.

<b>FY 2011 Hazardous Waste Program Commitments for UTAH</b>					
<b>Event</b>	<b># of Facilities or Units</b>	<b>Achieved by EOY FY2010</b>	<b>FY 2011</b>		
			<b>Committed</b>	<b>Achieved</b>	<b>EOY</b>
<b>Closure Activities (all at unit level)</b>					
Closure Plan Approval (CL360) for LDUs	55	53		0	53
Closure Verification (CL380) for LDUs	55	52		0	52
Closure Plan Approval (CL360) for TSUs	141	132		0	132
Closure Verification (CL380) for TSUs	141	120	1*	0	120
Closure Plan Approval (CL360) for CUs	6	5		0	5
Closure Verification (CL380) for CUs	6	3		0	3
Closure Plan Approvals Total (LDUs+TSUs+CUs)	202	190		0	190
Closure Verifications Total (LDUs+TSUs+CUs)	202	175		0	175
<b>Permit Activities at GPRU Universe Facilities (all at facility level)</b>					
Permitted Facilities under Approved Controls	27	25		0	25
Permit Renewal due this FY	4	1	2*	0	1
Permit Activities Totals				0	
<b>Permit Activities for GPRU Universe Facilities (at unit level)</b>					
Controls in Place for LDUs on Closure Track	40	38		0	38
Controls in Place for LDUs on Operating Track	4	4		0	4
Controls in Place for TSUs on Operating Track	140	138		0	138
Controls in Place for CUs on Operating Track	6	6		0	6
<b>Corrective Action Activities at GPRU Universe Facilities (activities are at facility level, unless specified at area level)</b>					
RCRA Facility Assessments (CA050)	24	23		0	23
Overall Facility NCAPS Ranking (CA075)	24	23		0	23
Facility Stabilization Assessment (CA225)	24	23		0	23
Facility Remedy Selection (CA400) (GPRU)	24	12		0	12
Facility Construction Completion (CA550) (GPRU)	24	11		0	11
Human Health Exposures Controlled (CA725) (GPRU)	24	22	1*	0	22
Groundwater Migration Controlled (CA750) (GPRU)	24	17		0	17
RFI Imposed (CA100) (area level)	844	776		0	776
RFI Approved (CA200) (area level)	844	589	1*	0	589
Remedy Selection (CA400) (area level)	844	463	1*	0	463
Construction Completion (CA550) (area level)	844	325	29*	0	325
Corrective Action Completed (CA999) (area level)	844	310	1*	0	310

\* See narrative below.

1. Closure Verification (CL380) for TSUs:  
One closure verification is planned for completion for Dugway HWMU #9.
2. Permit Renewal:  
Two permit renewals are planned for completion for the Clean Harbors Aragonite Facility and the post closure permit for TEAD.
3. RFI Approved (CA200) (area level):  
One RFI Report Approval is planned for completion for Dugway SWMU 204.
4. Remedy Selection (CA400) (area level)  
One Remedy Selection is planned for completion for Dugway SWMU 11.
5. Construction Completion (CA550) (area level):  
Twenty-nine Construction Completions for the area level are planned for the following:  
  
ATK Launch Systems - Bacchus  
SWMU SP-23  
SWMUs SP-3, 4 and 5  
23 Perchlorate Sumps SWMUs.  
  
Dugway Proving Grounds  
SWMU 192  
  
Anderson-Geneva  
One at the area level.
6. Corrective Action Completed (CA999) (area level)  
One Corrective Action Complete for the area level is planned for completion for Anderson-Geneva.
7. Human Health Exposure Controlled Determination (CA725)  
One Human Health Exposure Controlled Determination for ATK NIROP