Further Improvements Needed in the Administration of RCRA Civil Penalties

TABLE OF CONTENTS

EXECUTIVE SUMMARY

CHAPTERS

1.INTRODUCTION

Background

Scope and Methodology Prior Audit Coverage

2.RECOVERING ECONOMIC BENEFITS OF NONCOMPLIANCE IS ESSENTIAL

Improvements Needed In Recovering Economic Benefits of Noncompliance

Table: Review of Economic Benefit Calculations

Penalty Amounts and Compliance Not Found Related

More Guidance and Training Needed for Assessing Economic Benefits Recommendations

3.STATES NEED MORE CONSISTENT RCRA PENALTIES AND BETTER DOCUMENTATION

State Penalty Policies Vary

Gravity-Based Penalties Vary Among States

EPA Penalties Have Been Significantly Higher

Table: Average Final Penalty Amounts

Conclusions

Recommendations

EPA Effectively Documenting Penalties, While Some States Need Improvement

State Documentation Efforts Varied Depending on Penalty Policies

Table: State Documentation of Penalty Calculations and Adjustments

Conclusions

Recommendation

APPENDIX I - Scope and Methodology

APPENDIX II - Prior Audit Coverage

APPENDIX III - Analysis of Penalties and Compliance

APPENDIX IV - Report Distribution