



OFFICE OF RESOURCE CONSERVATION AND RECOVERY

WASHINGTON, D.C. 20460

November 24, 2025

MEMORANDUM

SUBJECT: Long-Term Implementation of Engineering and Institutional Control Components of RCRA Corrective Action Remedies

FROM: Catherine M. Davis, Acting Director
Waste and Chemical Implementation Division

TO: Land, Chemicals and Redevelopment Division Directors, Regions 1-10

Purpose

Goal 4 of the Hazardous Waste Cleanup Program Vision/Mission/Goals for 2030 calls for the Agency to have in place, by 2025, approaches to ensure implementation of the key elements of long-term stewardship. The purposes of this memorandum are to: (1) remind program implementers of that upcoming goal deadline, and (2) to provide suggestions to help meet that goal.

Discussion

The long-term effectiveness of RCRA cleanups often relies on the continued effectiveness of engineering controls (ECs) and institutional controls (ICs). To help guide the Agency's efforts to assure their long-term effectiveness, EPA issued a July 27, 2022, memorandum describing the key elements of effective long-term stewardship¹ and recommended that Regions work with states to incorporate or expand components of those elements into their long-term stewardship efforts.

Our understanding is that Regions and states have made significant progress in addressing long-term stewardship needs. As the end of 2025 approaches, it is important for each Region to evaluate its own progress and progress made by states in implementing the elements of long-term stewardship and, if necessary, identify steps that can be taken to help the Agency achieve Goal 4. The Office of Resource

¹ See EPA memorandum from Carolyn Hoskinson to Land, Chemicals and Redevelopment Division Directors entitled: "[Key Elements of Effective Long-Term Stewardship for RCRA Corrective Action](#)," June 27, 2022.

Conservation and Recovery will discuss long-term stewardship during regular Collaborative Oversight Program meetings with the Regions.

Some Regions have made significant progress toward integrating long-term stewardship practices into their programs and some have developed tools for implementing long-term stewardship, including checklists which can be an important tool to support facility assessments. We encourage Regions that have developed effective long-term stewardship implementation practices and useful tools to share those practices and tools with other Regions and with states that still need help achieving Goal 4. We also encourage those Regions and states that need help achieving Goal 4 by the end of this year to reach out to those Regions for support.

A site assessment checklist can be a valuable tool for establishing a long-term assessment protocol for a facility, implementing facility assessments, and maintaining records regarding the implementation of ECs and ICs. A checklist can identify relevant background information related to the facility, detail the site-specific information that should be observed during a facility assessment, and provide a format for maintaining the information gathered. A checklist can provide essential information to support a facility assessment including:

- A history of facility activities.
- Reference to the permit or alternate authority(ies) governing the facility.
- Information including findings of note from previous assessments.
- The type and location of the ECs and ICs relied on at the facility.
- A description of how to determine if the ECs and ICs are being implemented effectively.
- Contact information related to implementation of the controls.
- Areas of the facility that should be included in the assessment.
- Any records or additional information that should be reviewed during the assessment.

Checklists can facilitate consistent and thorough assessment of facilities. Previous checklists can be used as a starting point for conducting subsequent assessments, thereby reducing preparation workload. Finally, checklists can serve as a structure for Regions' discussions with states implementing corrective action.

Because long-term implementation of ECs and ICs is a program responsibility that is increasing over time, Regions are encouraged to raise awareness of the importance of routine assessment of facilities by including the topic of long-term EC and IC implementation in annual discussions with states. EPA will continue to work with the states to develop an increasingly robust long-term stewardship program, and to develop and establish expectations for the extent and frequency of facility assessments. The frequency of facility assessments will be a site-specific decision that considers the types of controls at the facility and other factors that affect the level of risk associated with potential failure. EPA recommends that as long-term stewardship programs develop and mature, program implementers strive to assess facilities no less frequently than every five years.

We believe that, working together, we can continue to make progress toward achieving Goal 4. If you have any questions about these issues, please contact Barbara Foster at foster.barbara@epa.gov.