

HAZARDOUS WASTE PROGRAM FULL TIME EMPLOYEE (FTE) HISTORY BY PROGRAM ELEMENT

March 6, 2012

PROGRAM ELEMENT	FTEs in 1999	FTEs in 2005	FTEs in 2012
Compliance Monitoring and Enforcement <i>(exclusive of 3 areas below)</i>	30	26	22 (2.45)
Manifest System	3	3	3 (3)
Waste Characterization	1	1	0
Corrective Action	8	12	9
Management and Reporting <i>(exclusive of 2 areas below)</i>	6	9	10 (.25)
Statutory/Regulatory Development	1	1	1
User Charges	0	2	1
Transporter Registration	1	1	1
Licenses and Closures	8	6	6
SEEPs	9	10	0*
TOTAL	67	71	53

*SEEPs are not included separately in the FTE count for fiscal year 2012 as they had been in previous years. Rather, their work is included among the FTEs working across the various program areas. The numbers in parentheses, (#), represent the amount of SEEPs included in the FTE count for the given program area.

HAZARDOUS WASTE MANAGEMENT PROGRAM EFFICIENCIES AND REDUCTIONS IMPLEMENTED

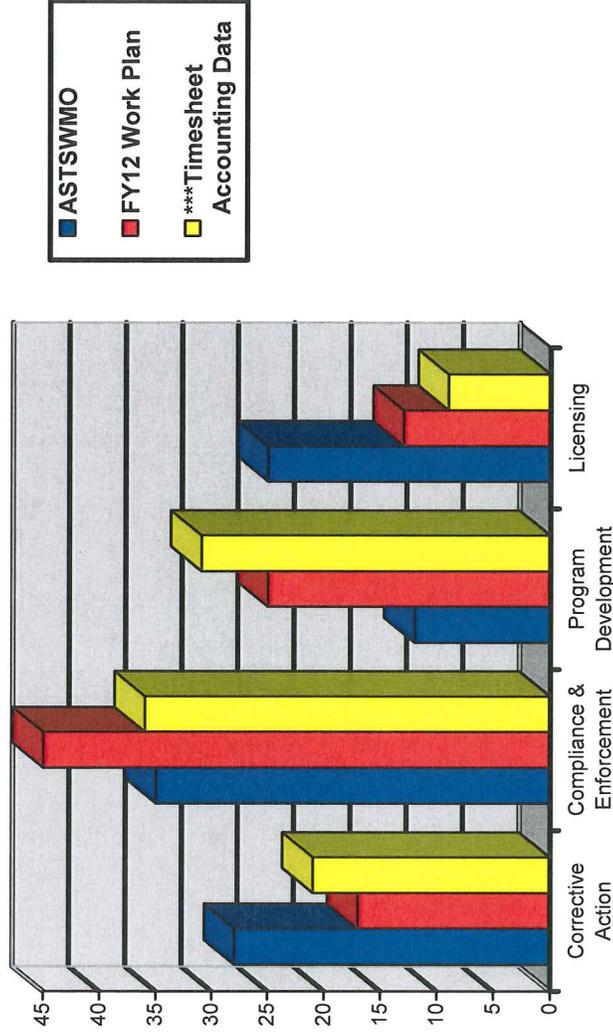
March 5, 2012

1. Waste Data Systems (WDS):
 - A. Data Entry
 - B. Manifest data in same system for staff and public, images available internally
 - C. Using WDS to reduce FOIA load
 - D. Efficiency in reporting, both internal and to EPA
 - E. Project management/ Workplan tracking
 - F. Manifest error reporting into spreadsheet instead of large printout
2. Enactment of Site Review Board and permit and license process streamlining legislation
3. Use of Part 201 environmental protection standards and MOU
4. Section restructuring (consolidated from 3 units to 2 units, saving costs)
5. Staffing, SEEPs, and vacancies
6. Action Data
7. Internal manifest process: the manifests are scanned, and those digital files are available to the districts on the t-drive. Staff can look up the manifest they are interested in through WDS (get the number) and then search for it in t-drive. Saves a lot of time and effort by having manifests readily available to all staff versus Lansing staff printing microfilm copy.
8. Use of manifest data for audits, identifying disconnects, trends, waste codes, capacity evaluation, business interests, user charges (HWUC), etc.
9. In order to cut staff time in reviewing companies prior to conducting field inspections, we have new Inspection Report format from WDS. It downloads all, or at least most, of the information that the EPA wants to see in our reports. It aids in consistency between districts which should, if used by all inspectors, make inspections more consistent when a company has sites in multiple districts.
10. Operating license (OL) templates and streamlining efforts
11. Cost allocations, laboratory, Attorney General (AG), Office of Criminal Investigation (OCI)
 - A. Changed from funding 2 AG positions to budgeting for actual services
 - B. Changed from funding staff at laboratory to paying for actual services
12. Continued adding to, and improving digital file storage for quick access and FOIA requests
13. Cut sampling and auditing budget
14. Minimized staff training
15. Minimized medical monitoring for staff
16. Minimized respirator certifications and associated duties
17. Minimized emergency support

18. Reduced assistance in Reuse/Recycle Determinations and LDR oversight
19. Reduced staff involvement in federal workgroups and rule developments (e.g. ASTSWMO)
20. Changed to 10-year OL term versus a 5-year term
21. Hard copies are no longer provided to internal ccs. They are now sent an e-mail noting the electronic file location
22. Acceptance of credit cards for site identification numbers and user charges
23. PCB manifests are no longer keyed into database
24. Emergency site ID number issuance
25. Revision of HWUC package
26. Trying out coordinated approvals on a site-by-site basis for PCB cleanups
27. User charge assistance from other program areas (EAC)
28. TSDf inspection frequency

DISTRIBUTION OF RESOURCES FOR CORE HAZARDOUS WASTE MANAGEMENT PROGRAM ELEMENTS

March 5, 2012



% OF TOTAL PROGRAM

PROGRAM ELEMENTS

*Corrective Action: RFA, RFI, CMS, CMI, oversight; CAMM inspections, public participation, enforcement support, financial assurance, some laboratory work

*Compliance & Enforcement: Record reviews, inspections, litigation, manifest processing, waste classifications, biennial reports, laboratory support, O&Ms, transporter registration, HWUC

*Program Development: Statutory and regulatory revisions, authorization, policy/guidance documents, training, information requests, administration, information management and reporting, outreach

*Licensing: Operating licenses, postclosure operating licenses, ** closure and postclosure plans, public participation, license and *** plan modifications, orders/LEAs, enforcement support, financial assurance, some laboratory work

** ASTSWMO includes closure plan work under corrective action whereas state includes under licensing

***Represents staff timesheet coding data for period from 10/1/11 to 2/3/12. This period is generally part of the colder weather season when not as much field work is conducted under the Corrective Action and Compliance and Enforcement Elements. As such, the percentages are skewed towards non-field-related work just as you would expect to see a similar four-month period during the spring and summer months skewed towards field-related work.

DRAFT REGION 5 AND COMPARABLE STATE PROGRAM INFORMATION FOR FISCAL YEAR 2012

March 5, 2012

STATE	1PPA OR WP	2UNIVERSE					3CIP	4INSPECTIONS					4CA MILESTONE REQUIREMENTS			4,5 FRR	4,6 OTHER KEY WORK	7 STATE STAFF	AMOUNT OF STATE'S PORTION OF OVERALL PROGRAM BUDGET (OVERALL BUDGET = STATE AND FEDERAL FUNDS)
		TOTAL TSDF	GPRA 2020	NONGPRA	LQG	SQG		TSDF	GME/O&M	LQG	SQG	TRANSPORTER	CA	CA	CA				
Illinois	PPA	524	155	369	745	14,974	100% (106)	16 (65)	12 (19)	25% ~189 (276)	2% ~265 (133)	?? (26)	67% (110)	59% (104)	37% (61)	100% (70)	Approximately 35 actively operating TSDFs. SQG # likely closer to 10,000 based on discussions with program staff. Construction inspections, QMP, authorization, RCRAInfo, compliance assistance, training, CA reviews, enforcement support, transporter registration, HWUC Permitting for HW and NWH transporters. One operators permit covers both, \$250 annually plus \$20/vehicle.	45	\$1,600,000 No GF. Funded 50/50 by Permits and Inspections (user charges) and Responsible Party and Penalties (cost recovery, enforcement) Funds (\$6,100,000)
Indiana	PPA	400	120	280	500	1,087	98% (79)	40 (40)	?	20% ~100 (223)	?	?? (23)	68% (107)	59% (94)	33% (60)	?? (24)	Construction inspections, QMP, authorization, RCRAInfo, compliance assistance, training, CA reviews, enforcement support, IRATS, and tablet computer, electronic inspection pilot, HWUC	44	\$1,100,000 94% GF, 6% dedicated funds (\$3,700,000)
Michigan	WP	241	119	122	584	2,453	75% (60)	62 (78)	7 (8)	20% ~120 (357)	12% ~300 (316)	33% (63)	74% (89)	69% (85)	38% (31)	100% (65)	Approximately 20 actively operating TSDFs. PC cap, construction, and CAMM inspections, QMP, authorization, RCRAInfo, compliance assistance, training, CA reviews, enforcement support, transporter registration, HWUC, laboratory, manifest 17 TSDF inspections at inactive, not clean closed facilities	53	\$2,500,000 No GF. Environmental Pollution Prevention and Hazardous Materials Transportation Program Funds (\$6,000,000)
Minnesota	PPA	97	90	7	254	1,394	5 (31)	12 (22)	?	20% ~50 (64)	?	?? (15)	92% (113)	90% (102)	83% (93)	?? (21)	Approximately 14 actively operating TSDFs. Construction inspections, QMP, authorization, RCRAInfo, compliance assistance, training, CA reviews, enforcement support, transporter registration	123	Not provided
New York	WP	302	174	128	4,651	5,173	7 (85)	29 (25)	8 (1)	20% ~117 (232)	6% ~329 (273)	?? (24)	84% 1021 (125)	78% 1017 (116)	56% 1010 (79)	?? (1)	Approximately 41 actively operating TSDFs. Currently 69 permits (41 regular, 9 CA only, 28 PC). FY12 WP indicates 301 TSDFs subject to CA, 174 GPRA 2020 Construction inspections, QMP, authorization, RCRAInfo, compliance assistance, training, CA reviews, enforcement support, transporter registration, HWUC, manifest	1353	\$1,600,000 - 2,000,000 Funded generally by Environmental Regulatory Account (HW fees) (\$5,000,000 - \$6,000,000)
Ohio	PPA	685	257	428	1,584	8,755	98% (162)	17 @ active (106)	?	20% ~317 (311)	?	?? (36)	81% (210)	69% (179)	46% (119)	100% (116)	Approximately 34 actively operating TSDFs. PC and construction inspections, QMP, authorization, RCRAInfo, compliance assistance, training, CA reviews, enforcement support, organics recycling, C&DD recycling	123	\$9,800,000 (\$14,000,000)
Pennsylvania	WP	226	364	0	1,404	10,675	10-14 (101)	65 (85)	?	20% ~280 (356)	2% ~260 (261)	?? (42)	77% 20 (248)	68% 11 (220)	43% 19 (134)	100% 4 (0)	Approximately 30 actively operating TSDFs. PC and construction inspections, QMP, authorization, RCRAInfo, compliance assistance, training, CA reviews, enforcement support, E-cycling, School Chemical Cleanout Campaign, transporter permitting (picking up/dropping off, not driving through) @ ~ \$500 initial, \$200 renewal, manifests (collects copies, no processing fee), HWUC. TSDF permitting in districts.	47	\$1,566,000 No GF. Funded by Hazardous Sites Cleanup Act (/ton and user charges). TSDF permit fees collected go to GF (\$6,200,000)
Wisconsin	PPA	131	128	3	588	1,294	29% (37)	?	?	20% ~118 (142)	?	?? (23)	81% (99)	69% (94)	40% (86)	?? (1)	Fewer than 12 actively operating TSDFs. PC and construction inspections, QMP, authorization, RCRAInfo, compliance assistance, training, CA reviews, enforcement support, transportation licensing,, HWUC, RCRA Core LQG Pilot Project, manifests CA not delegated to state	25	\$660,000 Little GF. Funded primarily by Program Revenue (licenses, plan review, manifest processing fees) and segregated Environmental Funds (/ton and generator annual charges) (\$2,600,000)

1 PPA = performance partnership agreement, WP = work plan

2 Universe based on RCRAInfo data, February 2012. Total TSDF universe includes all units that are, or were at some time, subject to the requirement to obtain a RCRA permit to operate as a TSDF.

3 CIP = controls in place; operating license, postclosure operating license, plan, order). Michigan has 60 TSDFs requiring CIP at this time. (#) = "GPRA Permit" number of facilities (i.e., total # currently requiring CIP); % = % of (#) to have CIP by end of FY12, not how many individual CIP to be done in FY12 alone unless so stated.

4 Expressed as % of GPRA 2020 baseline unless % does not appear after #, then actual #. With each state's baseline being different, % of baseline may reflect very different amounts of work. (#) = actual # FY11 actions completed in FY11 based on RCRAInfo data.

5 Includes closure, postclosure, corrective action, and liability mechanisms.

6 Compliance assistance (e.g., phone calls, website updating/maintenance, webinars, pamphlets, household hazardous waste, school programs, initiatives, Earth Day, Clean Sweep program, conference presentations)

7 Rounded to the nearest whole number, includes all non-U.S. EPA staff.

8 % based on information from 2009-2011 PPA.

9 These are goals to reach by 2015 not by end of FY12.

10 Number represents actions to be taken in FY12 even though % goals are by end of FY15.

11 Straight trade-off approach for up to 50% of LQG commitment to conduct a minimum # of LQG inspections (~26) to focus more on 10-day transfer sites, healthcare facilities, permanent HHW/CESQG collection sites, electronic waste recycling sites, sites closing, etc.

12 Minnesota delegates generator aspects of the program to six counties. The county programs provide their own staff and budget.

13 Includes 6 SEEPs and 3 vacancies.

FUTURE HAZARDOUS WASTE PROGRAM CHANGES, BENEFITS AND CONSEQUENCES

March 7, 2012

PROGRAM ELEMENT	FTES IN 2012	CHANGES	BENEFITS AND CONSEQUENCES
Compliance Monitoring and Enforcement (exclusive of 3 areas below)	22 (2.45)		
Manifest System	3 (3)		
Waste Characterization	0		
Transporter Registration	1		
Corrective Action	9		
Management and Reporting (exclusive of 2 areas below)	9 (.25)		
Statutory/Regulatory Development	1		
User Charges	2		
Licenses and Closures	6		
SEEP	0*		
Total	53		

*SEEPs aren't included separately in FTE count for FY12. Their work is included in FTEs working across various program areas. Numbers in parentheses, (#), represent SEEPs included in FTE count for area.