

Evaluation of Trends in Resource Conservation and Recovery Act State-Level Enforcement Data

April 28, 2026 | Report No. 26-E-0025



This Report Promotes Effective Oversight of Hazardous Waste Programs

To ensure adherence with environmental laws and regulations that are meant to protect people and the environment from potential harm, the EPA and states conduct compliance monitoring activities, such as inspections, and take enforcement actions as necessary. It is important that the EPA, Congress, and the public understand how consistently and effectively these activities and actions are implemented across the country.

To that end, the EPA OIG initiated a limited series of analyses to identify trends in how the EPA and the states are using available enforcement mechanisms. This report focuses on large quantity hazardous waste generators and the Resource Conservation and Recovery Act. We do not identify the root causes of observed trends, nor do we provide recommendations to the EPA; rather, our goal is to share information about enforcement trends that can help promote effective oversight in the administration and enforcement of hazardous waste programs.

Abbreviations

C.F.R.	Code of Federal Regulations
ECHO	Enforcement and Compliance History Online
EPA	U.S. Environmental Protection Agency
LQG	Large Quantity Generator
OIG	Office of Inspector General
RCRA	Resource Conservation and Recovery Act
U.S.C.	United States Code

Cover Image

Two rows of blue, red, and black barrels. One row is stacked on top of the other. (EPA image)

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At a Glance

Evaluation of Trends in Resource Conservation and Recovery Act State-Level Enforcement Data

Why We Did This Evaluation

To accomplish this objective:

The U.S. Environmental Protection Agency Office of Inspector General conducted this evaluation to identify state-level trends in Resource Conservation and Recovery Act enforcement data for large quantity generators from 2020 through 2024. The Act governs the generation, transportation, treatment, storage, and disposal of hazardous waste.

For facilities generating large quantities of hazardous waste, the EPA has established annual inspection expectations, which we call the standard inspection plan. Under this plan, 20 percent of the large quantity generators in each state and territory should be inspected each year, which means that all large quantity generators nationwide should be inspected once every five years. Inspections that identify a violation may result in either informal enforcement actions, such as letters of noncompliance, or formal enforcement actions, such as monetary penalties.

The EPA has authorized 50 states and territories to inspect the large quantity generators in their borders. The EPA serves as the inspecting agency for unauthorized states and territories, and it evaluates the inspection performance of authorized states and territories every five years.

To support these EPA mission-related efforts:

- *Compliance with the law.*
- *Partnering with states and other stakeholders.*

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What We Found

From 2020 through 2024, the EPA and some authorized states did not fully meet their commitment to inspect all large quantity generators, or LQGs, within that five-year period. Our analysis included 53 states and territories.* Of the states that we reviewed, 38 committed to the standard inspection plan to inspect every LQG within their borders at least once every five years. Thirty states achieved inspection rates at or above 85 percent, which is the highest performance level defined by the EPA: the “meets or exceeds expectations” performance level. Conversely, five states achieved an inspection rate at or between 71 and 84 percent, which falls within the “area for attention” performance level, while three states achieved inspection rates of 70 percent or below, which is the lowest “area for improvement” performance level. Additionally, for at least one year from 2020 through 2024, there were 15 states that followed EPA-approved alternative inspection plans instead of the standard inspection plan. On average, those 15 states inspected 65 percent of their LQGs.

Cumulatively, the EPA and authorized states inspected 5,499, or 81 percent, of the 6,827 LQGs from 2020 through 2024, conducting a total of 8,800 inspections in that time frame. Of these inspections, 4,661 resulted in at least one identified violation. In total, the inspecting agencies identified 23,404 violations and took 5,156 enforcement actions. Of those enforcement actions, 861, or about 17 percent, were formal actions, with 535 of those formal actions including at least one penalty.

There was wide variability in enforcement activities depending on the state, the region, and the lead inspecting agency. For example, although the EPA led just 8 percent of inspections, those inspections resulted in 23 percent of formal enforcement actions and 28 percent of penalties nationally. EPA-led inspections also resulted in higher penalties, with a median value of \$18,750 compared to \$11,999 for state-led inspections.

Understanding the trends and variabilities in inspections and enforcement behaviors can help the EPA identify areas of concern and determine the effectiveness of its enforcement strategies.

Our goal for this report is to share information about enforcement trends that may help promote effective oversight. As such, we do not identify the root causes of observed trends, nor do we make any recommendations.

** For simplicity, our use of the term state hereafter encompasses states, territories, and the District of Columbia, unless otherwise noted.*

Noteworthy Achievement

In December 2023, the EPA introduced a “compliance pipeline view” feature to its Enforcement and Compliance History Online [web tool](#). This view lets users see linkages across the enforcement process; improves the transparency of enforcement activities; and allows the EPA, the states, and the public to analyze trends.



OFFICE OF INSPECTOR GENERAL
U.S. ENVIRONMENTAL PROTECTION AGENCY

April 28, 2026

MEMORANDUM

SUBJECT: Evaluation of Trends in Resource Conservation and Recovery Act State-Level Enforcement Data
Report No. 26-E-0025

FROM: Nicole N. Murley, Deputy Inspector General performing the duties of the Inspector General *Nicole N. Murley*

TO: Jeffrey A. Hall, Assistant Administrator
Office of Enforcement and Compliance Assurance

This is our report on the subject evaluation conducted by the U.S. Environmental Protection Agency Office of Inspector General. The project number for this evaluation was [OSRE-FY25-0060](#). Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

A response to this report is not required because the report contains no recommendations. If your office submits a response, however, it will be posted on the OIG's website, along with our memorandum commenting on the response. The response should be provided as an Adobe PDF file that complies with the requirements of section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that your office does not want released to the public; if the response contains such data, your office should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at www.epa.gov/oig.

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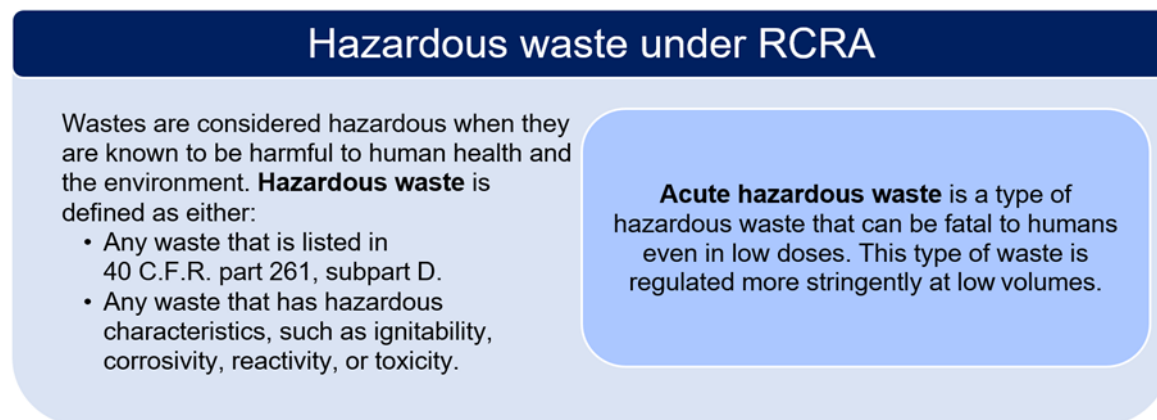
Purpose

The U.S. Environmental Protection Agency Office of Inspector General [initiated](#) this evaluation to identify state-level trends in Resource Conservation and Recovery Act enforcement data for large quantity generators from 2020 through 2024.

Background

Congress enacted the Resource Conservation and Recovery Act, or RCRA, in 1976 to tackle the country's growing volume of municipal and industrial waste.¹ The EPA's RCRA Program addresses nonhazardous waste flowing every day from U.S. households and businesses while also aiming to protect human health and the environment from hazardous waste. The EPA defines hazardous waste as waste that is "dangerous or capable of having a harmful effect on human health or the environment."² Figure 1, which provides the regulatory definition of hazardous waste, also distinguishes a separate, more dangerous category of hazardous waste called acute hazardous waste.

Figure 1: Hazardous waste definitions under RCRA



Source: OIG summary of [Managing your Hazardous Waste: A Guide for Small Businesses](#). (EPA OIG image)

Note: See 40 C.F.R. part 261, subpart D, for comprehensive lists of hazardous wastes.

Hazardous Waste Management Under the Resource Conservation and Recovery Act

The generation, transportation, treatment, storage, and disposal of hazardous waste is governed by Subtitle C of RCRA. The EPA's RCRA Subtitle C Program is intended to effectively manage hazardous waste, prevent contamination, and conserve resources to, in turn, protect people and the environment, save taxpayer money, enable commerce, and support the economy. RCRA defines a generator as any person or site that produces hazardous waste or "whose act first causes a hazardous waste to become subject to regulation."³ Hazardous waste generators may include such facilities as large manufacturing operations,

¹ 42 U.S.C. § 6901 et seq.

² EPA, *Learn the Basics of Hazardous Waste*, <https://www.epa.gov/hw/learn-basics-hazardous-waste> (last visited Sept. 22, 2025).

³ 40 C.F.R. § 260.10.

universities, hospitals, dry cleaners, auto body repair shops, and laboratories.⁴ The EPA classifies generators into three main categories based on their monthly production totals: very small quantity generators; small quantity generators; or large quantity generators, or LQGs. An LQG generates either 1,000 kilograms or more of non-acute hazardous waste per month or more than one kilogram of acute hazardous waste per month.

LQGs generate larger volumes of acute and non-acute hazardous waste than very small and small quantity generators, which raises the likelihood of mismanagement and consequently increases the risks to human health and the environment. As a result, the EPA has stricter reporting requirements for LQGs. The EPA has also established annual inspection expectations for LQGs, while it has not set specific inspection expectations for very small and small quantity generators. Each LQG must submit a report every two years that details its activities from the previous calendar year. This biennial report includes information about the facility; the type and total amount of hazardous waste that it generated; and whether it sent that waste for recycling, treatment, storage, or disposal. The biennial reports provide the EPA with a better understanding of the nation's hazardous waste generation and disposal activities. According to the 2023 biennial reports, LQGs produced over 31 million tons of hazardous waste in 2022.

State Authorization and EPA Oversight Under RCRA

Under the EPA's RCRA Program, states and territories may seek authorization to implement and enforce their own RCRA programs with the EPA's oversight.⁵ To receive authorization, the state RCRA programs must be at least as stringent as the federal program, but the states can adopt more stringent requirements. As of October 2025, the EPA had authorized a total of 50 nonfederal RCRA Subtitle C programs, including in the District of Columbia and Guam. The EPA directly implements the RCRA Program in Alaska, Iowa, Puerto Rico, and the U.S. Virgin Islands, as well as on some tribal lands.⁶

Authorized states are responsible for day-to-day RCRA program implementation and enforcement. EPA regional offices are responsible for RCRA program implementation and enforcement in states without authorization. EPA regional offices are also responsible for oversight of and support for authorized state RCRA programs. The EPA Office of Enforcement and Compliance Assurance is responsible for oversight of the national RCRA Program and the development of national policies to ensure that all states meet minimum environmental standards. The EPA's [National Enforcement Strategy for RCRA Corrective Action](#) emphasizes that nationally consistent enforcement and compliance principles, practices, and tools help to ensure facility accountability and to promote a level playing field among regulated facilities that compete across different states.

The EPA's [State Review Framework](#) is the primary way that the Agency evaluates the inspection and enforcement performance of state RCRA Subtitle C programs. Under this framework, the EPA reviews each

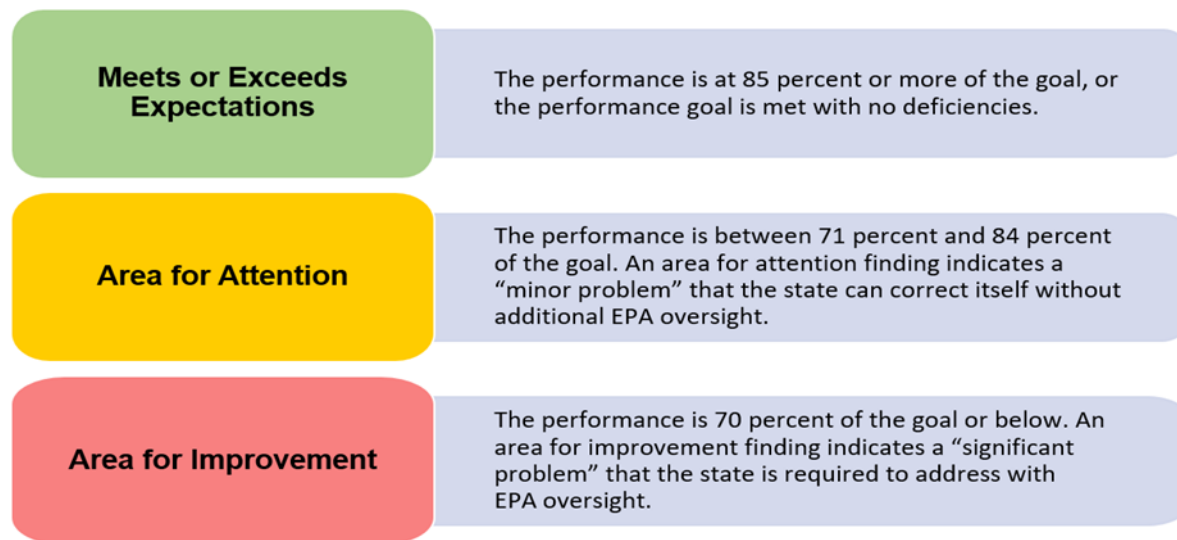
⁴ For the purposes of this report, we use the terms "facility" and "generator" synonymously.

⁵ Territories and Washington, D.C., can also obtain EPA authorization to implement and enforce RCRA programs. For simplicity, in this report, our use of the term "states" encompasses territories and Washington, D.C., unless otherwise noted.

⁶ Direct implementation is when the EPA carries out its programs in the absence of an EPA-approved state program.

state program once every five years to assess key areas, such as data accuracy, inspection frequency, and enforcement actions, comparing the state program’s performance in these key areas against national goals. The EPA characterizes the results as one of three finding levels: meets or exceeds expectations, area for attention, or area for improvement. We list the EPA’s definitions of these finding levels in Figure 2.

Figure 2: State Review Framework finding levels



Source: OIG summary of the *State Review Framework Compliance and Enforcement Program Oversight: SRF Reviewer’s Guide*, revised on April 4, 2025. (EPA OIG image)

The EPA provides grants to authorized states to implement their RCRA Subtitle C programs. As part of its grants oversight, the EPA reviews specific inspection and enforcement data each year and determines whether states met performance metrics established in annual grant workplans. In fiscal year 2025, the EPA provided authorized states approximately \$97.5 million via Resource Recovery and Hazardous Waste Grants.

Compliance Monitoring and Enforcement Under RCRA Subtitle C

The EPA and authorized states conduct compliance monitoring activities to verify the compliance of facilities regulated under RCRA Subtitle C and to deter noncompliance. Compliance monitoring activities include on-site inspections and off-site investigations and document reviews. Compliance evaluation inspections are the primary type of inspection conducted at LQGs. These are on-site inspections that determine compliance with all RCRA hazardous waste requirements.

Per the EPA’s 2021 [Compliance Monitoring Strategy for the Resource Conservation and Recovery Act \(RCRA\) Subtitle C Program](#), 20 percent of LQGs should be inspected annually so that every LQG in the country is inspected in a five-year period.⁷ For this report, we refer to this frequency of inspection as a

⁷ Effective January 2022, the EPA includes pharmaceutical reverse distributors as part of the universe for the LQG inspection goal. In 40 C.F.R. § 266.500, the EPA defines reverse distributors as “any person that receives and accumulates prescription pharmaceuticals that are potentially creditable hazardous waste pharmaceuticals for the purpose of facilitating or verifying manufacturer credit” and “any person, including forward distributors, third-party logistics providers, and pharmaceutical manufacturers, that processes prescription pharmaceuticals for the facilitation or verification of manufacturer credit.”

standard inspection plan. A state committed to a standard inspection plan would thus be expected to achieve 100 percent inspection coverage of all LQGs within its borders in a five-year period. The 2021 *Compliance Monitoring Strategy for the Resource Conservation and Recovery Act (RCRA) Subtitle C Program* also says that these LQG inspections should be compliance evaluation inspections and may be conducted by the EPA, the authorized state, or both jointly. Even for authorized states, the EPA is expected to inspect a small percentage of LQGs in those states.

An authorized state may request that the EPA approve an alternative inspection plan to reduce its LQG coverage commitment. These alternative inspection plans allow states the flexibility to redirect resources from LQG inspections and target compliance monitoring at other types of facilities, such as smaller generators, to address more pressing needs or priorities. States may select one of four preapproved alternative inspection plans or create a customized plan in consultation with the EPA, which means alternative inspection goals vary across these states. From 2020 through 2024, 15 states obtained the EPA's approval for an alternative inspection plan for at least a one-year period.

When an inspection identifies a violation, the EPA or an authorized state may pursue informal or formal enforcement actions. When a violation poses a minor threat to human health and the environment, the EPA or authorized state can use informal enforcement measures like letters or phone calls to notify the facility of its noncompliance, prompting the facility to take steps to correct the violation. If a facility is a significant noncomplier or if the facility owners or operators have not responded to an informal action, the EPA or authorized state should take formal enforcement actions. The EPA's [Hazardous Waste Civil Enforcement Response Policy](#) states that significant noncompliance should be addressed through formal enforcement actions within 360 days. These actions should include monetary penalties and may include other nonmonetary sanctions, such as permit modifications or facility shutdowns. The EPA has established an exceedance allowance to account for unique factors that could prevent the EPA or authorized state from meeting the 360-day response threshold. Specifically, the EPA and authorized states are allowed to exceed the 360-day response threshold for 20 percent of the formal enforcement actions taken each year in each region or state.

Significant noncompliers

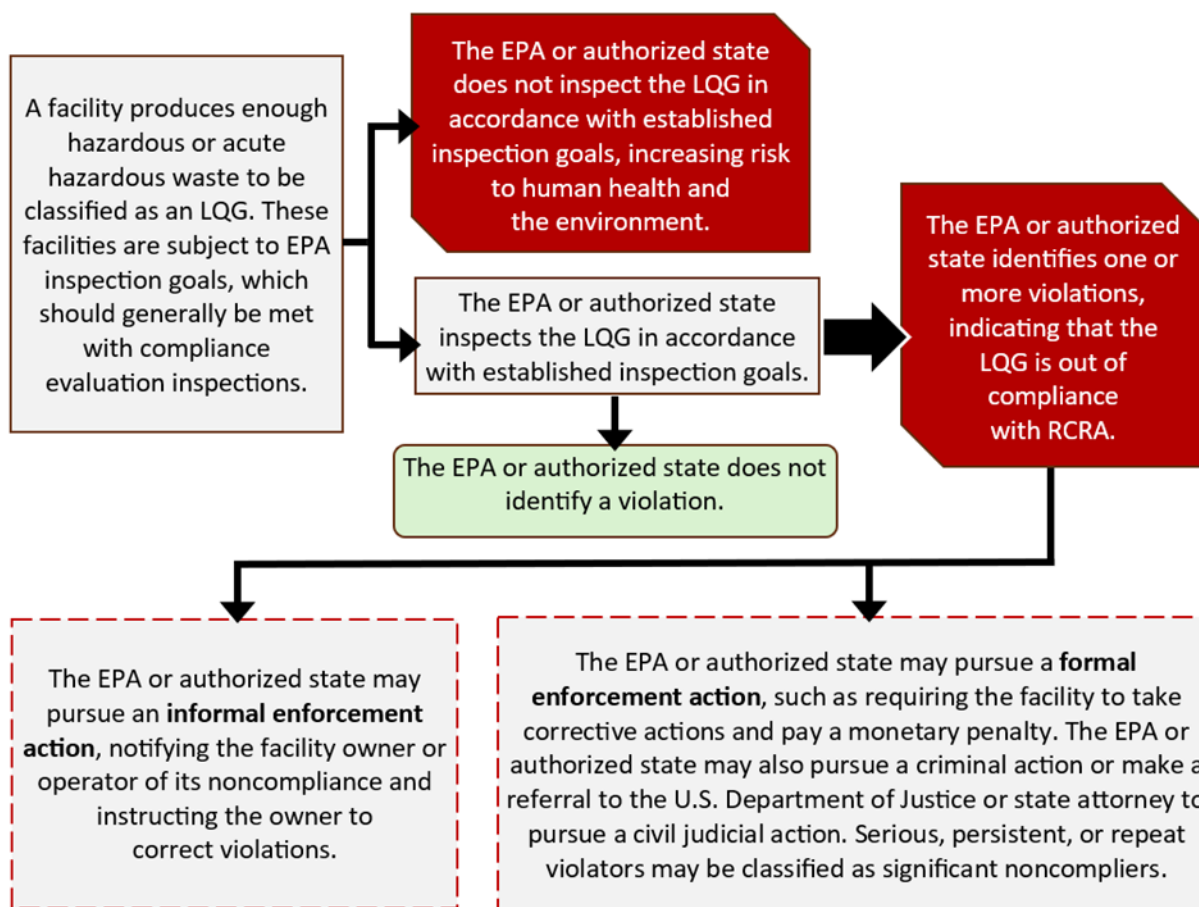
The EPA's *Hazardous Waste Civil Enforcement Response Policy* defines significant noncompliers as those that "have caused actual exposure or a substantial likelihood of exposure to hazardous waste or hazardous waste constituents; are chronic or recalcitrant violators; or deviate substantially from the terms of a permit, order, agreement or from RCRA statutory or regulatory requirements."

The EPA [Policy on Civil Penalties](#) prescribes a monetary penalty calculation for formal enforcement actions that accounts for the severity and duration of the violation, as well as for the facility's economic benefit from noncompliance. This policy identifies the goal of this monetary penalty as deterring noncompliance. To that end, the policy requires the penalty to not only completely offset any of the identified economic benefits but to also include an additional amount so that the violator is economically worse off than if it had complied with laws and regulations.

On December 5, 2025, the EPA established its [Reinforcing a “Compliance First” Orientation for Compliance Assurance and Civil Enforcement Activities](#) policy, which focuses on a “compliance first” enforcement approach. The policy emphasizes the use of compliance assistance tools, coordination with state partners, and open communication with states and regulated entities. This policy applies to federal civil enforcement and compliance and notes that “[a]uthorized states have primary jurisdiction over many programs, and [EPA] activities must affirmatively demonstrate proper deference and support to state leads in most compliance and enforcement work.” As detailed in the “Results” section of our report, authorized states account for the vast majority of RCRA compliance monitoring activities and enforcement actions.

Figure 3 summarizes the LQG inspection process, including the possible enforcement actions that the EPA or authorized state can take based on the inspection findings.

Figure 3: RCRA LQG inspection and enforcement flowchart



Source: OIG summary of the RCRA enforcement process for LQGs. (EPA OIG image)

Notes: A green box with rounded corners indicates compliance, while a red box with two slanted corners indicates noncompliance. A box with a red broken border indicates the potential results of noncompliance.

Effective Environmental Enforcement Programs and State Variability

Compliance monitoring and enforcement activities detect and deter noncompliance with environmental laws and regulations. Three primary factors affect a facility's incentive to comply with the law: the expected benefits from noncompliance, the probability that noncompliance will be discovered, and the anticipated consequences of identified noncompliance.⁸ If the expected benefits of noncompliance outweigh the expected costs, a facility has less incentive to comply with the law. According to the EPA's *Hazardous Waste Civil Enforcement Response Policy*, "a high rate of compliance within the regulated community ... is accomplished by establishing a comprehensive monitoring and inspection program, and addressing the most serious violators with timely, visible and effective enforcement actions."

Although states authorized to administer RCRA Subtitle C programs must follow the federal requirements, state compliance monitoring and enforcement activities, from inspection frequency to penalties, can vary across the country. Drivers of that variation may include differences in industrial composition, facility characteristics, regulatory severity, program budgets, local economic conditions, state and local political priorities, and interest groups. Compliance monitoring strategy flexibilities, like alternative inspection plans, may also contribute to differences in compliance monitoring and enforcement activities. However, despite those variables, the EPA established a goal in December 2013 to "ensure consistent implementation and oversight of federal environmental laws and policies across states in order to provide equal environmental benefits to the public and a level playing field for regulated entities."⁹ The EPA specifically noted that "[s]tates operate under different political and resource constraints; nonetheless, EPA must ensure that states use their best efforts to consistently apply the law and pursue vigorous enforcement, as appropriate."¹⁰

The EPA's Enforcement Reporting System

The EPA and authorized states must input compliance monitoring and enforcement activity data into the national database within 30 days of the activity.¹¹ That information feeds into the EPA's Enforcement and Compliance History Online, or ECHO, [web tool](#). ECHO includes compliance and enforcement information for more than one million facilities regulated under several statutes, including RCRA. It includes both EPA and state data, allowing users to search for and view detailed regulatory information for individual facilities, such as the facility's permits, inspection records, violation reports, and penalties. For RCRA, the [ECHO Hazardous Waste Dashboard](#) aggregates ten years' worth of metrics, including compliance monitoring, violation, significant noncompliance, enforcement action, and penalty metrics.

⁸ International Network for Environmental Compliance and Enforcement, *Principles of Environmental Enforcement and Compliance Handbook* 2nd ed. (2009).

⁹ EPA, [National Strategy for Improving Oversight of State Enforcement Performance](#) (2013).

¹⁰ *Id.*

¹¹ EPA, [RCRAInfo Data Reporting Requirements](#) (2024). Some states use their own database for tracking RCRA compliance monitoring and enforcement data rather than entering data directly into the national EPA database. The EPA allows those states an additional 30 days to transmit those data to the EPA database.

Responsible Offices

The EPA Office of Enforcement and Compliance Assurance addresses pollution issues that affect American communities through civil and criminal enforcement, focusing on water, air, and chemical hazards. This office works with states, tribal partners, and EPA regional offices to enforce environmental laws. Within the Office of Enforcement and Compliance Assurance, the Office of Compliance provides tools and training to EPA staff, states, and tribes to address noncompliance and advance national priorities. The Office of Compliance also manages the State Review Framework and ECHO.

The EPA Office of Land and Emergency Management is responsible for preventing contamination, cleaning contaminated land so that the land can be repurposed, and responding to emergencies. Within the Office of Land and Emergency Management, the Office of Resource Conservation and Recovery develops regulations, guidance, and policies designed to ensure the safe management and cleanup of solid and hazardous waste. The Office of Resource Conservation and Recovery also manages the data collection and reporting systems that support the RCRA Program.

In fiscal year 2025, the EPA budget for implementing the RCRA Program was approximately \$121 million. The EPA also administered an additional \$97.5 million in hazardous waste grants for authorized states to implement their RCRA Subtitle C programs.

Noteworthy Achievement

In December 2023, the EPA introduced a feature to ECHO called the “compliance pipeline view,” which allows users to view the correlations between specific compliance monitoring activities, identified violations, and enforcement actions at any given facility. Previously, users could not see the linkages across the enforcement process to understand how any of these activities, violations, and actions relate to one another, such as how a particular compliance monitoring activity led to a specific enforcement action. In June 2025, the EPA made the RCRA pipeline data available to the public. These data improve the transparency of RCRA enforcement activities and allow the EPA, the states, and the public to analyze trends, which can improve their understanding of program implementation.

Scope and Methodology

We conducted this evaluation from May 2025 to February 2026 in accordance with the *Quality Standards for Inspection and Evaluation* published in December 2020 by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we perform the evaluation to obtain sufficient and appropriate evidence to support our findings.

We interviewed subject matter experts from the Office of Land and Emergency Management and the Office of Enforcement and Compliance Assurance. We reviewed the 2021 *Compliance Monitoring Strategy for the Resource Conservation and Recovery Act (RCRA) Subtitle C Program* to identify the EPA’s goals and requirements related to the inspection process for LQGs. We also reviewed the RCRA State

Review Framework to determine the extent to which the EPA assesses that authorized states meet those goals and requirements.

We focused on LQGs because, compared to other types of generators regulated under RCRA Subtitle C, LQGs are subject to more nationally consistent requirements and produce the most hazardous waste. We used waste generation data from the mandatory biennial reports to establish a list of 6,827 LQGs that were likely active from 2020 through 2024.¹² Our dataset included only the generators that, on average, exceeded the monthly LQG generation threshold for acute or non-acute hazardous waste in both the 2021 and 2023 biennial reports. Because of this selection methodology, our analysis does not include all LQGs. There were a total of 13,359 generators listed as LQGs in the 2021 and 2023 biennial reports. We excluded the 6,532 generators that did not exceed the monthly LQG generation threshold for acute or non-acute hazardous waste in both years. By doing so, we narrowed our analysis to include the 6,827 generators that consistently reported producing enough hazardous waste to be classified as an LQG and thus merited attention from the EPA's or authorized states' compliance monitoring and enforcement activities under RCRA Subtitle C.

For compliance monitoring and enforcement data, we used ECHO's publicly available RCRA compliance pipeline dataset. We refined that dataset to exclude compliance monitoring and enforcement activities at generators that were not on our active LQG list. We also refined it to include only compliance evaluation inspections and actions resulting from compliance evaluation inspections that occurred from 2020 through 2024, as the EPA considers only that type of inspection when determining whether states have met the LQG inspection coverage commitment. Hereafter, any use of the term inspection in this report refers to a compliance evaluation inspection.

After identifying the active LQGs and refining the ECHO dataset, we analyzed national and state-level data across the enforcement process and at the facility level. Our analysis focused on key indicators of robust enforcement like inspection coverage,¹³ formal enforcement, penalties, and resolution of significant noncompliance. We assessed how often inspections identify a violation, how often violations result in enforcement actions, how often those enforcement actions are formal, and how often formal enforcement actions result in a penalty. We also assessed median penalties and significant noncomplier timeliness with regard to the 360-day response threshold to better understand how states address serious violators. Finally, we conducted a correlation analysis on the 35 states with a universe size of at least 50 LQGs to explore relationships between those states' key enforcement indicators.

Impediments and Scope Limitations

From July 2020 through March 2022, the EPA permitted off-site compliance monitoring activities to count toward on-site LQG inspection commitments because of the COVID-19 pandemic. A prior EPA OIG report found that both the inspection rate and the rate of violations identified per inspection fell from

¹² EPA, *RCRAInfo Hazardous Waste Information Platform (HWIP)*, <https://rcrapublic.epa.gov/rcra-hwip/> (last visited March 26, 2026).

¹³ We use the term inspection coverage to refer to the number of facilities inspected and the amount of waste that those inspected facilities generated.

March 2020 through February 2021.¹⁴ These factors may impact the inspection and enforcement activity covered by this evaluation, such that the identified trends are not fully representative of typical operating conditions. Further, state enforcement activities may vary because of state-specific variables. Because of these variables, comparing state-level enforcement outputs requires deep contextual understanding of each state.

We included all states and territories with LQGs that met our inclusion criteria except for California, which we excluded from our analysis because of a known data issue with missing inspections in the ECHO pipeline data. As a result, our scope included 53 state-level entities: 49 states; Guam; Puerto Rico; the U.S. Virgin Islands; and Washington, D.C.¹⁵ As we previously discussed, during the five-year period that we evaluated, the EPA approved alternative inspection plans in 15 of those states, while the other 38 states committed to a standard inspection plan from 2020 through 2024.¹⁶ Because of the varying objectives of the alternative plans, we could not directly compare the outcomes of those plans.

Prior Reports

In EPA OIG Report No. [22-E-0047](#), *The EPA Continues to Fail to Meet Inspection Requirements for Hazardous Waste Treatment, Storage, and Disposal Facilities*, issued June 8, 2022, we concluded that inspection rates of RCRA treatment, storage, and disposal facilities were high overall but that the EPA continued to fall short of RCRA's inspection requirements. The report said this shortfall may have occurred because the EPA did not prioritize inspections. We issued one recommendation in this report, and the EPA completed its corrective action addressing that recommendation.

In EPA OIG Report No. [22-E-0009](#), *Authorized State Hazardous Waste Program Inspections and Operations Were Impacted During Coronavirus Pandemic*, issued December 1, 2021, we described how inspection rates for LQGs by authorized states fell by 47 percent from March 2020 through February 2021. During this period, the EPA suggested that authorized states substitute in-person inspections with off-site evaluations. We issued five recommendations in this report, and the EPA completed corrective actions for all of them.

In EPA OIG Report No. [21-P-0132](#), *Resource Constraints, Leadership Decisions, and Workforce Culture Led to a Decline in Federal Enforcement*, issued May 13, 2021, we detailed how EPA-led compliance monitoring activities, enforcement actions, monetary enforcement, results, and environmental benefits generally declined nationwide from fiscal year 2007 through fiscal year 2018. We issued eight recommendations in this report, and the EPA completed corrective actions for all of them.

In EPA OIG Report No. [20-P-0131](#), *EPA's Compliance Monitoring Activities, Enforcement Actions, and Enforcement Results Generally Declined from Fiscal Years 2006 Through 2018*, issued March 31, 2020,

¹⁴ EPA Off. of Inspector Gen., [22-E-0009](#), *Authorized State Hazardous Waste Program Inspections and Operations Were Impacted During Coronavirus Pandemic* (2021).

¹⁵ American Samoa and the Commonwealth of the Northern Mariana Islands did not have any LQGs that met our inclusion criteria.

¹⁶ These 38 states include both authorized states and those states in which the EPA directly implements the program.

we described that the EPA’s annual level of compliance monitoring activities, enforcement actions, and enforcement results generally declined from fiscal year 2006 through fiscal year 2018. Additionally, funding for the EPA’s enforcement activities and the number of enforcement staff decreased when comparing fiscal year 2006 to fiscal year 2018. We did not issue any recommendations in this report.

In EPA OIG Report No. [12-P-0113](#), *EPA Must Improve Oversight of State Enforcement*, issued December 9, 2011, we reported that despite efforts by the Office of Enforcement and Compliance Assurance and the EPA regions to improve state enforcement performance, states frequently did not meet national enforcement goals and did not always take necessary enforcement actions. We issued six recommendations in this report, and the EPA completed corrective actions for all of them.

Results

From 2020 through 2024, the EPA and some authorized states did not fully meet their commitment to inspect all LQGs within that five-year period.¹⁷ Of the 38 states that committed to a standard inspection plan, 15 fulfilled that commitment by inspecting all their LQGs. Another 15 states did not inspect all their LQGs but achieved the “meets or exceeds expectations” performance level under the EPA’s State Review Framework, meaning that they inspected at least 85 percent of their LQGs once in that five-year period. The remaining eight states inspected less than 85 percent of their LQGs. State-level LQG inspection rates ranged from 46 percent to 100 percent.¹⁸ Nationwide, 81 percent of the LQGs that we reviewed were inspected; these inspected LQGs were responsible for generating 94 percent of all non-acute and 95 percent of all acute hazardous waste.

Additionally, there was wide variability in other enforcement activities depending on the state, the EPA region, and the lead inspecting agency, including the number of violations identified, the percentage of violations that resulted in an enforcement action, the percentage of enforcement actions that were formal enforcement actions, and the median penalty assessed. Although we expected variability, quantifying variability improves understanding of how authorized states have carried out compliance monitoring and enforcement activities. This perspective of the enforcement process supports targeted oversight and technical assistance to facilitate monitoring program consistency across states. We did not identify the root causes or the effects of these results; rather, we share these observations to inform the EPA’s program execution.

¹⁷ As we discuss in the “Background” section, inspections in authorized states are conducted by the state, the EPA, or both jointly, while the EPA conducts the inspections in unauthorized states. Hereafter, for simplicity, we generally attribute inspection coverage to the state, regardless of who served as the lead inspecting agency, unless otherwise noted.

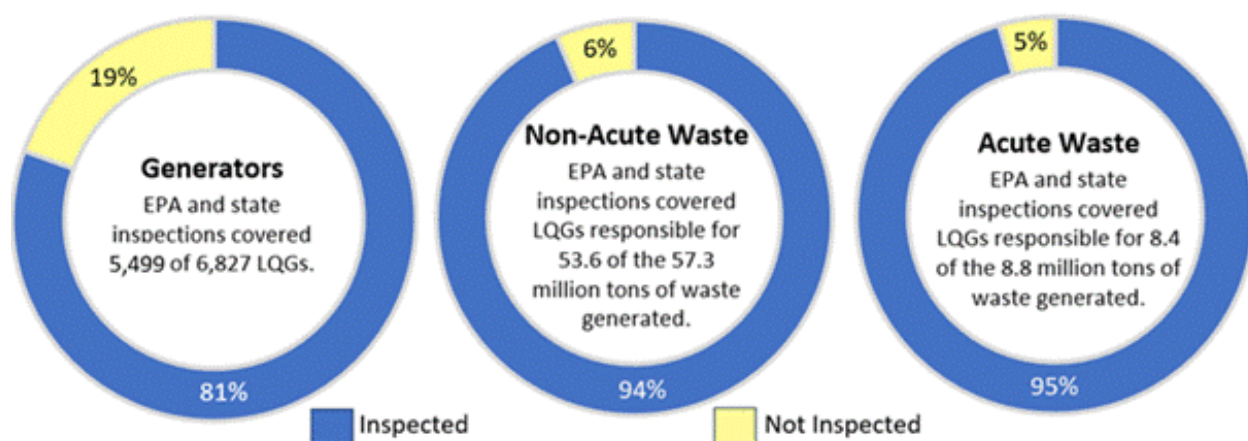
¹⁸ Throughout our results, we rounded percentages and monetary values to the nearest whole number.

Not All States Met Their LQG Inspection Commitments for 2020 Through 2024

National Overview

The EPA publishes annual LQG inspection percentages through the State Review Framework report and in ECHO, but these annual percentages do not indicate whether all LQGs were inspected at least once in a five-year period. Our analysis showed, however, that the EPA and some authorized states did not fully meet their commitment to inspect every LQG over a five-year period. As shown in Figures 4 and 5, from 2020 through 2024 the EPA and authorized states cumulatively inspected 5,499, or 81 percent, of the 6,827 LQGs that we reviewed.¹⁹ Those inspections covered LQGs generating approximately 94 percent of non-acute hazardous waste and 95 percent of acute hazardous waste.

Figure 4: Cumulative EPA and state RCRA LQG inspection coverage, 2020–2024

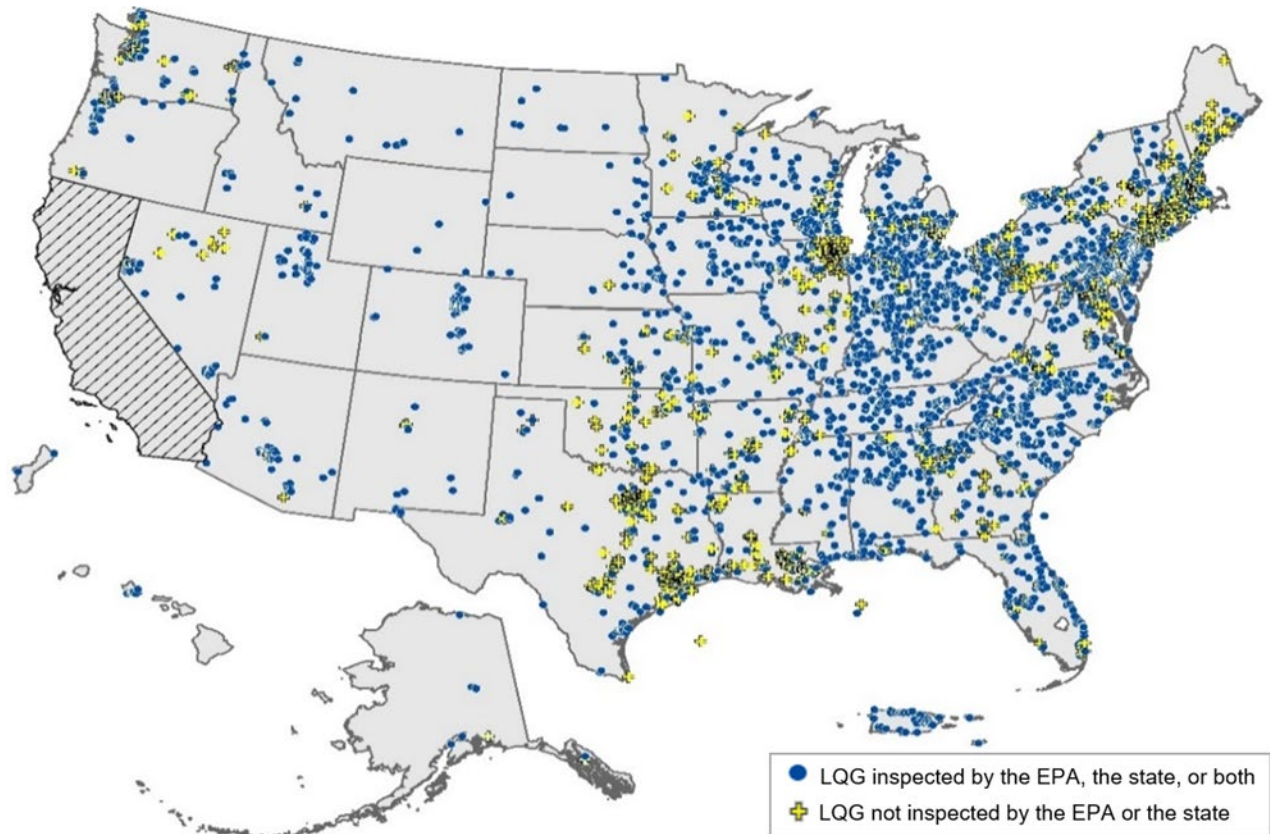


Source: OIG analysis of EPA and state enforcement data. (EPA OIG image)

Note: The amounts of waste generated are rounded to the nearest decimal point.

¹⁹ The national totals include both the states on the standard inspection plan and the states on approved alternative plans.

Figure 5: Geographic distribution of EPA and state LQG inspection coverage, 2020–2024



Source: OIG analysis of EPA and state enforcement data. (EPA OIG image)

States on Standard Inspection Plans

Of the states that we reviewed, 38 committed to a standard inspection plan to inspect every LQG within their borders at least once every five years. These 38 states include both authorized states and states in which the EPA directly implements the RCRA Subtitle C Program. As shown in Table 1, 15 of those states fulfilled that commitment, with all their LQGs inspected at least once from 2020 through 2024. Another 15 states did not inspect all their LQGs but achieved the State Review Framework performance level of “meets or exceeds expectations,” meaning that they achieved inspection rates at or above 85 percent. Maine and Arkansas had the lowest LQG inspection rates at 46 percent and 64 percent, respectively. When considering inspections of LQGs by the amount of waste generated, Oregon, North Carolina, and Maine inspected LQGs that generated 55 percent, 60 percent, and 69 percent, respectively, of the states’ hazardous waste, the lowest hazardous waste percentages among the 38 states with standard inspection plans.

Of the four states in which the EPA directly implements the RCRA Subtitle C Program, the Agency inspected all the LQGs in three: Iowa, Puerto Rico, and the U.S. Virgin Islands. The EPA inspected 83 percent of the LQGs in Alaska, the fourth state in which the EPA directly implements the RCRA Program.

Table 1: LQG inspection rates in states with standard inspection plans, 2020–2024

State	LQG universe (number of facilities in our analysis)	Inspection coverage by number of facilities (%)	Inspection coverage by amount of non-acute waste generated (%)	Inspection coverage by amount of acute waste generated (%)	LQG inspection performance level*
South Carolina	166	100	100	100	Meets or exceeds
Kentucky	145	100	100	100	Meets or exceeds
Iowa	95	100	100	100	Meets or exceeds
Colorado	78	100	100	100	Meets or exceeds
West Virginia	58	100	100	100	Meets or exceeds
Puerto Rico	42	100	100	100	Meets or exceeds
South Dakota	23	100	100	100	Meets or exceeds
Vermont	17	100	100	100	Meets or exceeds
Montana	12	100	100	100	Meets or exceeds
North Dakota	12	100	100	100	Meets or exceeds
District of Columbia	10	100	100	100	Meets or exceeds
Hawaii	10	100	100	100	Meets or exceeds
Wyoming	4	100	100	n/a	Meets or exceeds
Guam	3	100	100	n/a	Meets or exceeds
U.S. Virgin Islands	2	100	100	n/a	Meets or exceeds
Alabama	137	99	100	100	Meets or exceeds
Tennessee	172	99	95	100	Meets or exceeds
Utah	75	99	100	100	Meets or exceeds
North Carolina	218	99	60	100	Meets or exceeds
New Jersey	210	97	97	100	Meets or exceeds
Arizona	98	97	100	100	Meets or exceeds
Delaware	32	97	99	100	Meets or exceeds
Mississippi	63	97	100	87	Meets or exceeds
Wisconsin	231	95	82	95	Meets or exceeds
Ohio	432	94	98	100	Meets or exceeds
Indiana	271	94	100	100	Meets or exceeds
Missouri	162	91	97	100	Meets or exceeds
Florida	198	91	94	83	Meets or exceeds
Idaho	20	90	98	100	Meets or exceeds
New Mexico	17	88	90	100	Meets or exceeds

State	LQG universe (number of facilities in our analysis)	Inspection coverage by number of facilities (%)	Inspection coverage by amount of non-acute waste generated (%)	Inspection coverage by amount of acute waste generated (%)	LQG inspection performance level*
Alaska	12	83	77	100	Area for attention
Oregon	97	82	55	99	Area for attention
Pennsylvania	428	81	88	98	Area for attention
Nevada	57	81	85	96	Area for attention
Georgia	174	75	84	96	Area for attention
New York	261	74	72	97	Area for improvement
Arkansas	98	64	84	100	Area for improvement
Maine	48	46	73	6	Area for improvement
Total	4,188	91	96	100[†]	n/a

Source: OIG analysis of EPA and state enforcement data. (EPA OIG table)

Notes: n/a = Not Applicable. The EPA inspected the one LQG on tribal lands, but it only inspected one of the three offshore LQGs. We excluded those facilities from our analysis. The percentages presented in this table are rounded to the nearest whole number.

* The LQG inspection performance levels are based on the inspection coverage by number of facilities, shown in column three, and the definitions in the RCRA State Review Framework, shown in Figure 2.

† The inspected LQGs generated 1,376,101 of the 1,376,804 total tons of acute hazardous waste, or 99.95 percent. As a result, the nationwide inspection coverage of acute waste rounds to 100 percent even though some states did not inspect all the acute waste generated within their states.

States on Alternative Inspection Plans

There were 15 states that followed EPA-approved alternative inspection plans for at least one year from 2020 through 2024. Those 15 states inspected 65 percent of their LQGs; however, the inspected LQGs produced 93 percent of the states' total acute and non-acute hazardous waste. In comparison, states with standard inspection plans inspected 91 percent of their LQGs, which generated 97 percent of the hazardous waste in those states.

Despite having lower inspection rates on average than states on standard inspection plans, many states on alternative inspection plans still achieved high inspection rates, as shown in Table 2. Rhode Island, Nebraska, Minnesota, and Michigan each inspected over 85 percent of their LQGs. Additionally, the LQGs that Nebraska, Minnesota, and Michigan inspected generated 85 percent or more of their hazardous waste. In contrast, the LQGs that Kansas inspected generated 8 percent of the state's hazardous waste because it did not inspect its largest LQG. Connecticut's inspections covered 36 percent of the state's LQGs and 57 percent of the non-acute hazardous waste generated, among the lowest percentages of the 15 states with alternative inspection plans.

Table 2: LQG inspection rates in states with alternative inspection plans, 2020–2024

State	LQG universe (number of facilities in our analysis)	Inspection coverage by number of facilities (%)	Inspection coverage by amount of non-acute waste generated (%)	Inspection coverage by amount of acute waste generated (%)	Calculated LQG inspection goal (%)*
Nebraska	37	95	99	100	60
Michigan	298	89	95	100	50
Minnesota	152	86	99	80	50
Rhode Island	39	85	61	100	100
Kansas	111	82	8	88	90
Washington	135	77	90	39	80
Virginia	153	75	74	90	94
Oklahoma	89	66	87	71	50
Maryland	113	63	77	99	95
Massachusetts	206	62	74	51	52
Louisiana	165	59	92	87	50
New Hampshire	45	58	53	89	75
Texas	556	55	99	100	50
Illinois	394	48	80	99	50
Connecticut	146	36	57	32	50
Total	2,639	65	93	95	n/a

Source: OIG analysis of EPA and state enforcement data. (EPA OIG table)

Note: The percentages presented in this table are rounded to the nearest whole number.

* We calculated the LQG inspection goal using the specific goals from state alternative inspection plans. We could not assess state performance using the State Review Framework because the state plans did not correspond with the State Review Framework performance goal of 100 percent coverage. Those states chose to redirect resources from LQG inspections and target compliance monitoring at other types of facilities, such as small or very small quantity generators, to address more pressing needs or priorities. While we could not directly calculate the inspection goals for all alternative inspection plans, we provide this goal for context.

From 2020 through 2024, there was substantial variation in compliance monitoring and enforcement metrics at LQGs at the state, EPA region, and lead inspecting agency levels. These variations may reflect contextual and operational factors that fell outside of the scope of this evaluation.

National and State-Level Inspection Results

There were 8,800 inspections of 5,452 LQGs from 2020 through 2024 across all states.²⁰ Of these inspections, 4,661, or approximately 54 percent, resulted in at least one identified violation.²¹ In total, inspecting agencies identified 23,404 violations and took 5,156 enforcement actions. Of those enforcement actions, 861, or about 17 percent, were formal actions, and 535 of those formal actions also included at least one penalty. Over that same time, 395 of the 5,452 inspected LQGs, or about 7 percent, were designated as significant noncompliers, and 279 of these significant noncompliers were addressed within the Agency’s 360-day response threshold, as outlined in the *Hazardous Waste Civil Enforcement Response Policy*. However, we cannot determine whether the response threshold goal of 80 percent was nationally achieved for the 429 LQG significant noncomplier designations because the goal applies to all significant noncomplier determinations across all facility types, not just at LQGs.²² See Appendix A for our complete results.

From the inspections of LQGs to the resolution of any identified violations, states varied widely in the compliance monitoring and enforcement actions that they took. This is summarized in Table 3, which provides the median, minimum, and maximum values of each metric that we analyzed. The median value represents the middle number in a dataset, whereas the maximum and minimum values represent the highest and lowest numbers in a dataset. The differences among these three numbers demonstrates the degree to which states differed in how they carried out their enforcement activities; greater differences reflect varied state approaches, other state-level factors, or both. Figures 6 and 7 demonstrate this variation for two of these metrics: how often inspections identified violations and the extent to which states leveraged formal enforcement actions.

Table 3: Summary statistics of state-level enforcement metrics at LQGs, 2020–2024

Metric	Median	Minimum	Maximum
Percent of LQGs inspected	89%	36%	100%
Percent of inspections that identified at least one violation	60%	26%	90%
Percent of inspected LQGs with at least one violation	69%	35%	91%
Percent of inspected LQGs with a significant noncomplier determination	8%	0%	22%
Median number of violations identified at LQGs with at least one violation	4	2	7.5

²⁰ In addition to California, tribes, and oil rigs, we removed territories from our results.

²¹ When determining the percentage of inspections with an identified violation, we removed 243 inspections with undetermined outcomes from the overall inspection count. An undetermined outcome indicates an inspection that is fewer than 150 days old or an inspection that has not been updated with a final determination in a timely manner. Undetermined outcomes represented 3 percent of all inspections in our analysis but varied by state.

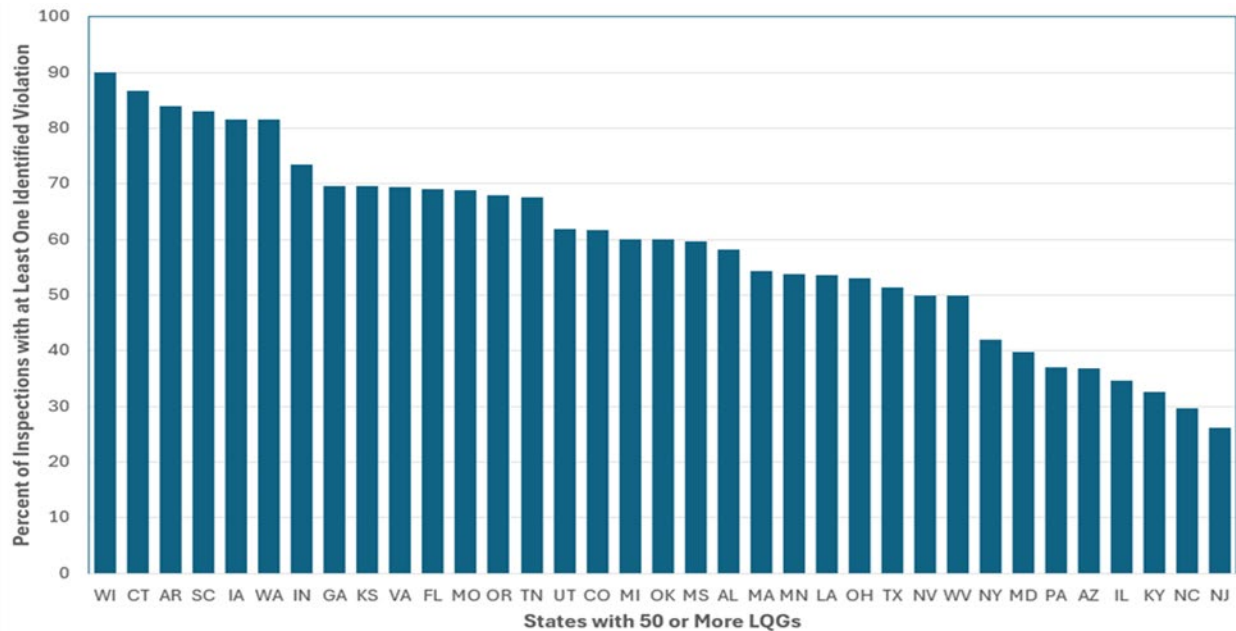
²² As noted in our “Background” section, the EPA established an exceedance allowance which permits the Agency and states to exceed the 360-day response threshold for 20 percent of all facilities regulated under RCRA per year.

Metric	Median	Minimum	Maximum
Percent of violations with enforcement actions	93%	6%	100%
Percent of enforcement actions that were formal enforcement actions	16%	1%	67%
Percent of formal enforcement actions with penalty	63%	19%	100%
Median penalty	\$15,660	\$3,980	\$128,125
Percent of significant noncompliers that were addressed within the 360-day response requirement	50%	0%	100%

Source: OIG analysis of EPA and state enforcement data. (EPA OIG table)

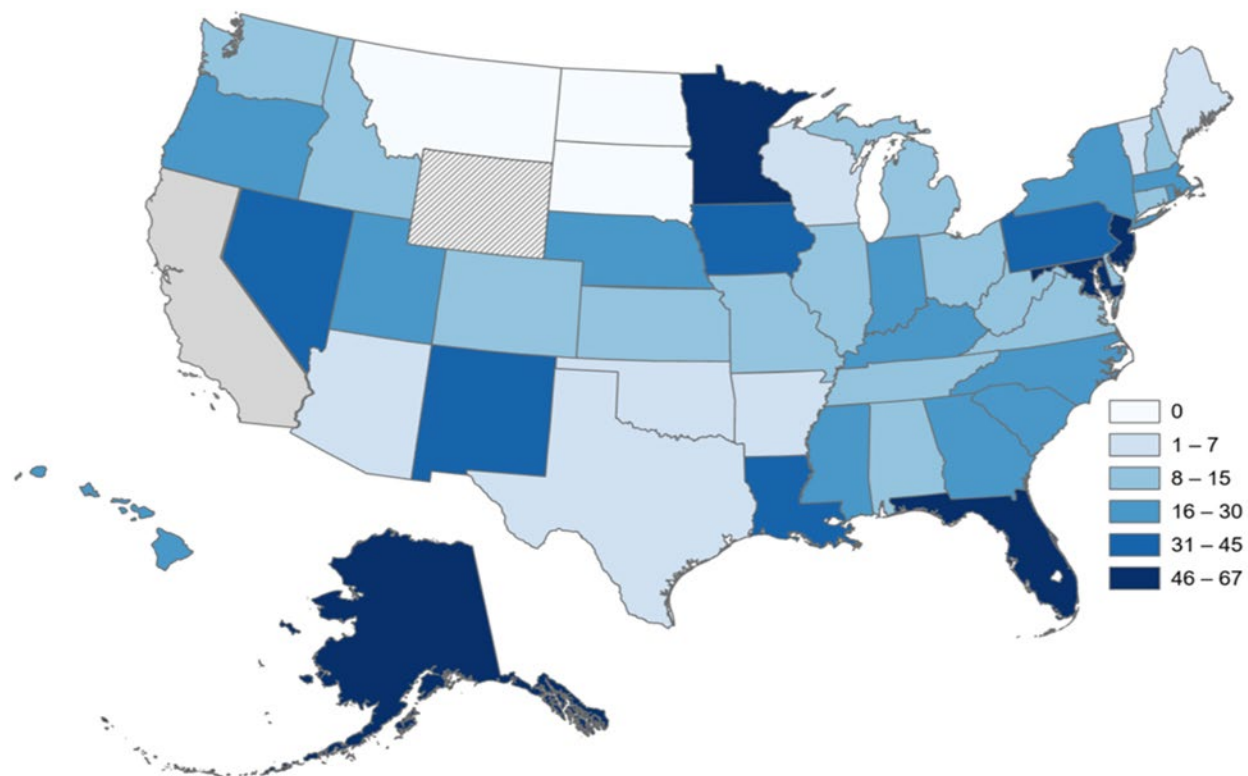
Note: Because low sample sizes can influence data, this table analyzes values from the 35 states that have 50 or more LQGs.

Figure 6: Percentage of LQG inspections with at least one identified violation, 2020–2024



Source: OIG analysis of EPA and state enforcement data for states with 50 or more LQGs. (EPA OIG image)

Figure 7: Percentage of LQG enforcement actions that were formal, 2020–2024

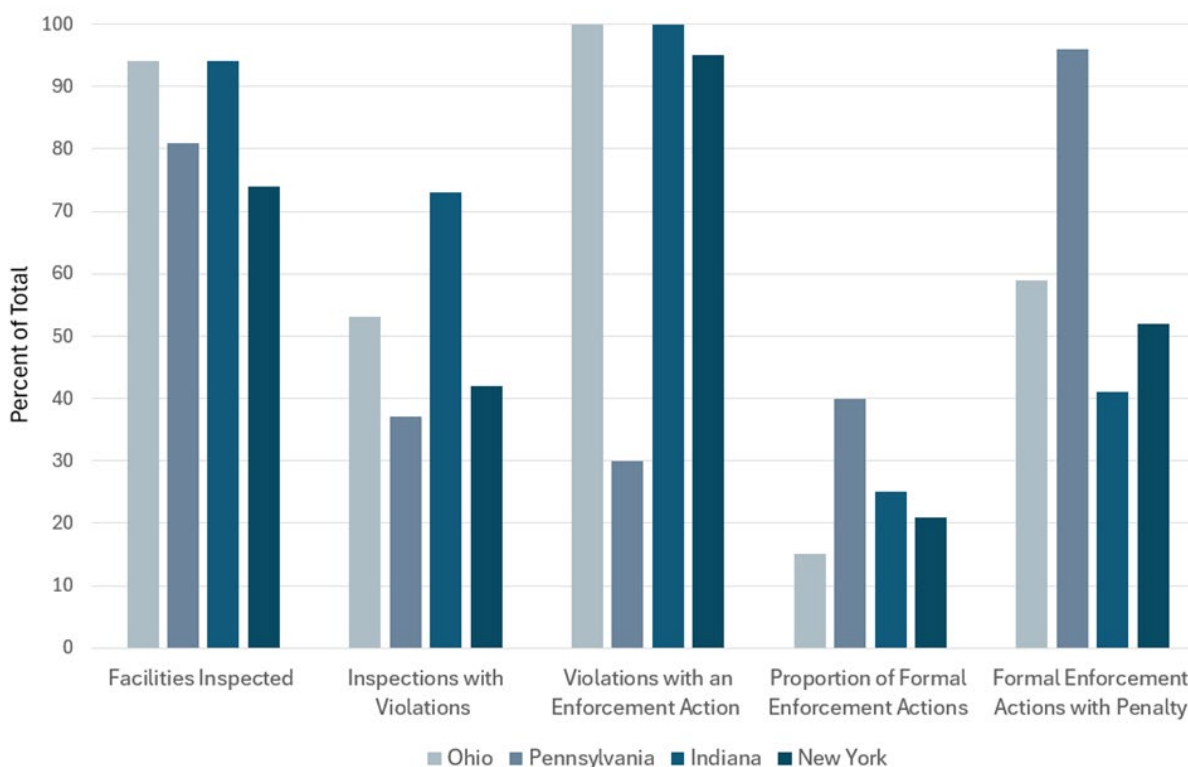


Source: OIG analysis of EPA and state enforcement data. (EPA OIG image)

Notes: Wyoming is shaded gray with stripes because inspections of LQGs in Wyoming did not result in any enforcement actions from 2020 through 2024. California is shaded gray to indicate that we omitted that state from our analysis because of missing data.

Figure 8 compares the four states that committed to standard inspection plans and that have the largest number of LQGs: Ohio, Pennsylvania, Indiana, and New York. Pennsylvania identified violations and pursued enforcement actions less often than the other three states. When Pennsylvania pursued enforcement actions, however, those actions were more likely to be formal and to include monetary penalties.

Figure 8: Comparison of states that committed to standard inspection plans and that have the most LQGs



Source: OIG analysis of EPA and state enforcement data. (EPA OIG image)

As described in our scope and methodology, after assessing the key enforcement indicators for each state, we analyzed the relationships between those metrics to determine the extent to which the results reflect widespread patterns in enforcement and compliance assurance behavior. Our analysis suggests that no single metric is strongly associated with another.²³ There was, however, a moderate but statistically significant negative correlation between the percentage of violations with enforcement actions and the proportion of formal actions taken.²⁴ This indicates that in states that took fewer enforcement actions after violations were identified, those enforcement actions were more likely to be formal actions. Similarly, there was a moderate but statistically significant positive correlation between the percentage of inspections with an identified violation and the median violation rate, indicating that states that identify violations more often also tend to find more violations each time. With our analysis, we illustrate that while there may be subtle patterns in enforcement and compliance behaviors across states, the state variability in our metrics is more likely to be explained by state-level differences that we did not assess, like program resources or industrial composition.

²³ We used a Spearman correlation test to determine the strength of relationships between metrics and a two-tailed significance test to determine the statistical significance between relationships. We also did not analyze the following metrics because of the small number of observations across states: percentage of facilities with significant noncomplier determinations, percentage of formal enforcement actions resulting in a penalty, and percentage of significant noncomplier determinations that met the 360-day response threshold.

²⁴ A statistically significant relationship means that the relationship is not likely to be the result of chance.

Regional and Lead Inspecting Agency Inspection Results

As shown in Appendix B, regional trends further contextualize state-level results. Because EPA regional staff oversee authorized state RCRA programs, our analysis can help the EPA regions more effectively fulfill their responsibilities to provide guidance to and oversight of their state partners. Similar to state-level results, regional results varied for 2020 through 2024, though grouping data by region reduced variability across metrics. Across most regions, at least half of all inspections resulted in identified violations, with only EPA Regions 2 and 3 falling below that threshold.²⁵ Informal enforcement actions were more common than formal enforcement actions, although lead inspecting agencies in Region 2 pursued formal enforcement actions at a higher rate than other regions. Most formal enforcement actions resulted in penalties, with only EPA Region 6 falling below the 50 percent mark. Significant noncomplier determinations remained relatively rare, hovering between 4 and 13 percent of all inspected facilities.

There were wide variations in the percentage of significant noncompliers that were addressed within the 360-day response threshold compared to the national average of 65 percent. EPA Regions 1, 7, and 10 fell well below the national average, while 100 percent of significant noncompliers in EPA Region 8 were addressed within the 360-day response threshold. Although Regions 1, 7, 8, and 10 vary considerably from the national average, Regions 8 and 10 have relatively low numbers of LQGs. See Appendix B for our complete analysis.

As shown in Table 4, there are also variations in compliance monitoring and enforcement outcomes based on who the lead inspecting agency was: the EPA, a state, or both jointly. The EPA identified violations in 76 percent of inspections that it led, states identified violations in 52 percent of their inspections, and joint inspections identified violations 85 percent of the time. EPA-led inspections also tended to result in formal enforcement actions and penalties more often than state-led inspections. Although the EPA led 8 percent of inspections, those inspections resulted in 23 percent of formal enforcement actions and 28 percent of penalties nationally. Additionally, EPA-led inspections resulted in higher penalties, with a median value of \$18,750 compared to \$11,999 for state-led inspections. Figure 9 demonstrates that Alaska and Iowa, two states for which the EPA directly implements the RCRA Subtitle C Program, were among the top three states in percentage of facilities that received at least one penalty.

Table 4: Lead inspecting agency compliance and enforcement metrics at LQGs, 2020–2024

Metric*	EPA	State	Joint
Percent of inspections led (total number of inspections nationwide)	8% (8,800)	88% (8,800)	4% (8,800)
Percent of inspections with a violation identified (total number of entity-led inspections)	76% (682)	52% (7,771)	85% (347)
Median number of violations identified for each violator (total number of inspections with at least one violation)	4 (413)	3 (3,954)	8 (294)

²⁵ We omitted Region 9 from our discussion of regional-level trends because of missing California data.

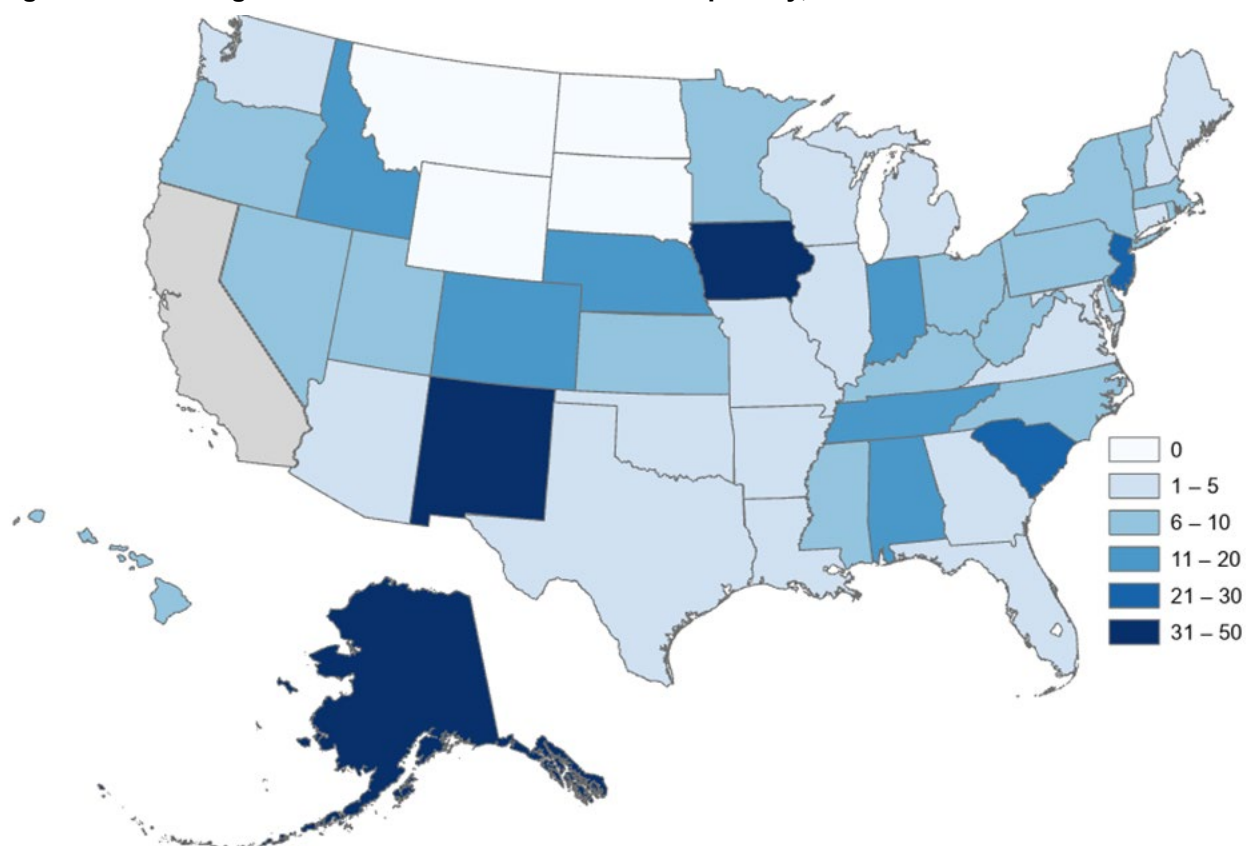
Metric*	EPA	State	Joint
Percent of violations with an enforcement action taken (total number of violations)	64% (2,809)	87% (20,485)	72% (110)
Percent of formal enforcement actions taken (total number of enforcement actions taken)	38% (530)	14% (4,567)	44% (59)
Percent of formal enforcement actions with penalty (total number of formal enforcement actions)	87% (200)	54% (635)	73% (26)
Median penalty (total number of penalties)	\$18,750 (137)	\$11,999 (337)	\$29,000 (16)
Percent of significant noncompliers that were addressed within the 360-day response threshold (total number of significant noncomplier determinations)	22% (67)	74% (346)	50% (16)

Source: OIG analysis of EPA and state enforcement data. (EPA OIG table)

Notes: The data in this table are incomplete because of missing California data. Additionally, “joint” lead agency information may not reflect all joint inspections because of data entry practices at the state level. For table cells that contain two numbers, the number in parentheses corresponds with the “Metric” column text shown in parentheses; for example, in the “EPA” column in the first row, “8%” is the percent of inspections that the EPA led and “(8,800)” is the total number of inspections.

* The table presents a range of compliance monitoring and enforcement activities related to LQGs, from the inspections conducted to the resolution of serious violations and significant noncompliance. The first row, shaded in light gray, contains metrics related to LQG inspections; the second and third rows, shaded in light blue, contain violation metrics; the fourth and fifth rows, shaded in light yellow, contain enforcement metrics; and the final three rows, shaded in light green, contain metrics related to the resolution of serious violations and significant noncompliance.

Figure 9: Percentage of LQGs that received at least one penalty, 2020–2024



Source: OIG analysis of EPA and state enforcement data. (EPA OIG image)

Note: California is shaded gray to indicate that we omitted that state from our analysis because of missing data.

Conclusions

Our analysis provides insight into whether the EPA and authorized states met their five-year inspection commitments for active LQGs and how they implemented compliance monitoring and enforcement activities, from inspections to resolutions of serious violations and significant noncompliance. Our analysis also demonstrates state variability in compliance monitoring and enforcement behaviors, which, when paired with contextual knowledge, can assist the EPA and authorized states in identifying areas of concern and determining the effectiveness of their enforcement strategies.

Agency Response and OIG Assessment

We provided the Agency with a copy of our draft report for review. Because there were no recommendations, the Agency was not required to provide a formal response, and the Agency did not do so. The Agency provided technical comments, which we incorporated into our report as appropriate.

State-Level Compliance Monitoring and Enforcement Metrics at LQGs, 2020–2024

The table below presents a range of compliance monitoring and enforcement activities related to LQGs in 49 states and Washington, D.C., from inspections at the facility level to the resolution of identified violations and significant noncompliance. The second through fourth columns, shaded in light gray, contain metrics related to LQG inspections; the fifth and sixth columns, shaded in light blue, contain violation metrics; the seventh and eighth columns, shaded in light yellow, contain enforcement metrics; and the final three columns, shaded in light green, contain metrics related to the resolution of identified violations and significant noncompliance.

Notes: EA = Enforcement Action. n/a = Not Applicable. SNC = Significant Noncomplier.

In addition to California, we excluded territories, tribes, and offshore oil rigs from our state-level analysis.

For table cells that contain two numbers, the number in parentheses corresponds with header row text in parentheses; for example, in the “% LQGs inspected” column in the first row, “83” is the percent of LQGs that were inspected and “(12)” is the total number of LQGs that we assessed.

State	% LQGs inspected (total number of LQGs)	% inspected LQGs with at least one violation	% inspected LQGs with SNC determination (total number of inspected LQGs)	% inspections with a violation identified*	Median number of violations identified for each violator	% violations with an EA taken	% formal EAs taken (total number of EAs taken)	% formal EAs with penalty (total number of formal EAs)	\$ median penalty in USD (total number of penalties)	% SNCs addressed within 360-day response threshold (total number of SNC determinations)
AK	83% (12)	80%	0% (10)	91%	6	100%	53% (17)	100% (9)	\$19,177 (6)	n/a (0)
AL	99% (137)	71%	17% (136)	58%	4	83%	15% (198)	97% (30)	\$18,350 (29)	93% (27)
AR	64% (98)	86%	3% (63)	84%	5	100%	4% (75)	33% (3)	\$15,000 (1)	50% (2)
AZ	97% (98)	39%	1% (95)	37%	2	100%	1% (100)	100% (1)	\$5,000 (1)	0% (1)
CO	100% (78)	71%	12% (78)	62%	3	96%	14% (77)	100% (11)	\$18,736 (11)	100% (10)
CT†	36% (146)	87%	10% (52)	87%	7.5	51%	10% (41)	100% (3)	\$90,000 (3)	0% (5)
DC	100% (10)	70%	0% (10)	69%	2	100%	11% (9)	100% (1)	\$7,500 (1)	n/a (0)
DE	97% (32)	84%	10% (31)	84%	5.5	100%	11% (28)	67% (3)	\$10,000 (2)	100% (3)
FL	91% (198)	82%	19% (180)	69%	4	6%	67% (12)	75% (8)	\$15,660 (6)	88% (40)
GA	75% (174)	77%	6% (130)	70%	4	75%	16% (115)	44% (18)	\$30,400 (7)	88% (8)
HI	100% (10)	80%	10% (10)	50%	2	85%	27% (11)	33% (3)	\$708,627 (1)	0% (1)
IA	100% (95)	84%	7% (95)	82%	3	94%	34% (90)	100% (31)	\$7,500 (31)	13% (8)
ID	90% (20)	67%	11% (18)	67%	3	94%	15% (20)	100% (3)	\$24,600 (3)	50% (2)
IL†	48% (394)	35%	1% (191)	35%	5	79%	13% (77)	100% (10)	\$7,500 (5)	0% (2)

State	% LQGs inspected (total number of LQGs)	% inspected LQGs with at least one violation	% inspected LQGs with SNC determination (total number of inspected LQGs)	% inspections with a violation identified*	Median number of violations identified for each violator	% violations with an EA taken	% formal EAs taken (total number of EAs taken)	% formal EAs with penalty (total number of formal EAs)	\$ median penalty in USD (total number of penalties)	% SNCs addressed within 360-day response threshold (total number of SNC determinations)
IN	94% (271)	83%	11% (255)	73%	4	100%	25% (344)	41% (85)	\$12,500 (31)	84% (32)
KS†	82% (111)	69%	9% (91)	70%	3	82%	13% (70)	100% (9)	\$31,379 (9)	25% (8)
KY	100% (145)	63%	8% (145)	33%	3	93%	16% (195)	48% (31)	\$55,000 (14)	47% (15)
LA†	59% (165)	59%	22% (98)	54%	4.5	100%	34% (77)	19% (26)	\$11,900 (5)	65% (26)
MA†	62% (206)	52%	8% (128)	54%	4	92%	22% (67)	93% (15)	\$17,740 (13)	50% (10)
MD†	63% (113)	58%	0% (71)	40%	2	56%	53% (19)	50% (10)	\$11,250 (5)	n/a (0)
ME	46% (48)	82%	5% (22)	90%	3.5	88%	6% (18)	100% (1)	\$20,150 (1)	0% (1)
MI†	89% (298)	71%	3% (264)	60%	2	100%	9% (278)	42% (24)	\$16,139 (8)	13% (8)
MN†	86% (152)	58%	8% (130)	54%	2	63%	47% (49)	43% (23)	\$3,980 (10)	100% (10)
MO	91% (162)	74%	4% (148)	69%	4	65%	12% (69)	88% (8)	\$28,337 (7)	29% (7)
MS	97% (63)	61%	13% (61)	60%	3	63%	16% (49)	63% (8)	\$21,864 (5)	22% (9)
MT	100% (12)	92%	0% (12)	71%	3.5	98%	0% (55)	n/a (0)	n/a (n/a)	n/a (0)
NC	99% (218)	56%	9% (215)	30%	4	87%	28% (208)	31% (58)	\$20,714 (17)	55% (22)
ND	100% (12)	83%	0% (12)	46%	2	100%	0% (19)	n/a (0)	n/a (n/a)	n/a (0)
NE†	95% (37)	83%	26% (35)	85%	4	83%	22% (49)	64% (11)	\$133,040 (7)	13% (8)
NH†	58% (45)	96%	0% (26)	96%	11	94%	8% (26)	50% (2)	\$7,005 (1)	n/a (0)
NJ	97% (210)	45%	12% (204)	26%	3	89%	50% (152)	74% (76)	\$4,000 (53)	83% (24)
NM	88% (17)	67%	33% (15)	69%	3	97%	33% (33)	73% (11)	\$39,585 (8)	60% (5)
NV	81% (57)	70%	2% (46)	50%	3	95%	33% (45)	33% (15)	\$5,550 (5)	100% (1)
NY	74% (261)	53%	9% (193)	42%	4	95%	21% (145)	52% (31)	\$30,000 (15)	67% (18)
OH	94% (432)	59%	4% (408)	53%	3	100%	15% (412)	59% (63)	\$11,600 (29)	72% (18)
OK†	66% (89)	68%	5% (59)	60%	3	93%	4% (50)	100% (2)	\$128,125 (2)	67% (3)
OR	82% (97)	66%	9% (80)	68%	6	97%	28% (64)	78% (18)	\$4,800 (9)	13% (8)
PA	81% (428)	59%	3% (346)	37%	2	30%	40% (65)	96% (26)	\$19,555 (25)	30% (10)
RI†	85% (39)	79%	12% (33)	81%	5	96%	22% (27)	83% (6)	\$38,438 (4)	50% (4)

State	% LQGs inspected (total number of LQGs)	% inspected LQGs with at least one violation	% inspected LQGs with SNC determination (total number of inspected LQGs)	% inspections with a violation identified*	Median number of violations identified for each violator	% violations with an EA taken	% formal EAs taken (total number of EAs taken)	% formal EAs with penalty (total number of formal EAs)	\$ median penalty in USD (total number of penalties)	% SNCs addressed within 360-day response threshold (total number of SNC determinations)
SC	100% (166)	89%	20% (166)	83%	5	81%	16% (383)	83% (60)	\$12,000 (50)	74% (35)
SD	100% (23)	4%	0% (23)	3%	1	100%	0% (1)	n/a (0)	n/a (n/a)	n/a (0)
TN	99% (172)	89%	10% (170)	68%	3	86%	11% (349)	50% (40)	\$9,400 (19)	91% (22)
TX†	55% (556)	66%	0% (307)	51%	5	99%	4% (279)	42% (12)	\$15,000 (5)	0% (1)
UT	99% (75)	85%	0% (74)	62%	5	93%	17% (99)	29% (17)	\$23,967 (5)	n/a (0)
VA†	75% (153)	75%	6% (114)	69%	5	97%	8% (97)	50% (8)	\$34,004 (4)	29% (7)
VT	100% (17)	71%	6% (17)	58%	3	98%	7% (15)	100% (1)	\$7,118 (1)	100% (1)
WA†	77% (135)	88%	2% (104)	82%	6	100%	9% (120)	100% (11)	\$19,151 (8)	50% (2)
WI	95% (231)	91%	1% (219)	90%	5	99%	3% (292)	100% (8)	\$8,750 (4)	0 (2)
WV	100% (58)	64%	5% (58)	50%	2	100%	15% (66)	40% (10)	\$14,015 (4)	100% (3)
WY	100% (4)	50%	0% (4)	14%	1	0%	n/a (0)	n/a (0)	n/a (n/a)	n/a (0)
Nation-wide	80% (6,780)	68%	7% (5,452)	54%	4	84%	17% (5,156)	62% (861)	\$13,000 (490)	65% (429)

Source: OIG analysis of EPA and state enforcement data. (EPA OIG table)

* We excluded inspections with undetermined violation outcomes from this metric.

† State with alternative inspection plan.

Regional Compliance Monitoring and Enforcement Metrics at LQGs, 2020–2024

The table below presents a range of compliance monitoring and enforcement activities related to LQGs, from inspections conducted at the facility level to the resolution of identified violations and significant noncompliance. The second through fourth columns, shaded in light gray, contain metrics related to LQG inspections; the fifth and sixth columns, shaded in light blue, contain violation metrics; the seventh and eighth columns, shaded in light yellow, contain enforcement metrics; and the final three columns, shaded in light green, contain metrics related to the resolution of identified violations and significant noncompliance.

Notes: EA = Enforcement Action. n/a = Not Applicable. SNC = Significant Noncomplier.

Region 9 data are incomplete because of missing California data. We also excluded territories, tribes, and offshore oil rigs from our analysis.

For table cells that contain two numbers, the number in parentheses corresponds with header row text in parentheses; for example, in the “% LQGs inspected” column in the first row, “55” is the percent of LQGs that were inspected and “(501)” is the total number of LQGs that we assessed.

EPA region	% LQGs inspected (total number of LQGs)	% inspected LQGs with a violation	% inspected LQGs with SNC determination (total number of inspected LQGs)	% inspections with a violation identified*	Median number of violations identified for each violator	% violations with an EA taken	% formal EAs taken (total number of EAs taken)	% formal EAs with penalty (total number of formal EAs)	\$ median penalty in USD (total number of penalties)	% SNCs addressed within 360-day response threshold (total number of SNC determinations)
1	55% (501)	69%	8% (278)	70%	5	81%	15% (194)	90% (29)	\$20,125 (23)	38% (21)
2	84% (471)	49%	11% (397)	33%	3	93%	36% (297)	67% (107)	\$6,750 (68)	76% (42)
3	79% (794)	63%	4% (630)	44%	3	64%	20% (284)	71% (58)	\$14,193 (41)	48% (23)
4	95% (1,273)	74%	13% (1,203)	53%	4	71%	17% (1,509)	60% (253)	\$17,500 (147)	75% (178)
5	83% (1,778)	67%	5% (1,467)	62%	4	97%	15% (1,452)	52% (213)	\$10,000 (87)	71% (72)
6	59% (925)	67%	6% (542)	57%	5	98%	11% (514)	39% (54)	\$25,875 (21)	62% (37)
7	91% (405)	76%	8% (369)	74%	3	77%	21% (278)	92% (59)	\$11,875 (54)	19% (31)
8	100% (204)	70%	4% (203)	53%	4	94%	11% (251)	57% (28)	\$21,760 (16)	100% (10)
9	92% (165)	51%	2% (151)	42%	2	96%	12% (156)	37% (19)	\$5,550 (7)	33% (3)
10	80% (264)	77%	15% (212)	76%	6	99%	19% (221)	90% (41)	\$16,563 (26)	25% (12)

Source: OIG analysis of EPA and state enforcement data. (EPA OIG table)

* We excluded inspections with undetermined violation outcomes from this metric.

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