



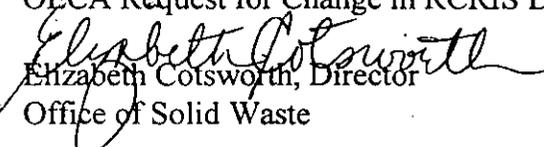
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAR 19 1999

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

**MEMORANDUM**

**SUBJECT:** OECA Request for Change in RCRIS Database Policy

**FROM:**   
Elizabeth Cotsworth, Director  
Office of Solid Waste

**TO:** Elaine G. Stanley, Director  
Office of Compliance

This is in response to your memorandum dated January 19, 1999, entitled *Request for Change in RCRIS Database Policy* which asks that OSW change RCRIS practice and include information on Conditionally Exempt Small Quantity Generators (CESQGs) in the RCRIS National Oversight Database even if the CESQG does not have any core<sup>1</sup> data on program activity appearing in the database. I share your concerns regarding effective integration of information across multiple EPA programs, and consistent views of our program activity for public use and accomplishments reporting. In this instance, however, I believe those goals are best served by maintaining the current practice related to CESQG data at the national level in RCRIS.

We currently have a consistent approach for highlighting at the national level those CESQGs where core program activity has occurred and been recorded in RCRIS. The agreements on those core elements and their definitions have been developed in careful consultation with States and Regions. It is this set of core data which provides the basis for key national program management reporting both for OSW and OECA. While I understand there was some discussion about whether or not all core enforcement data for CESQGs are being captured at the national level, we have confirmed that the national database does correctly reflect the core program data entered by States or Regions about CESQGs.

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<sup>1</sup> Core data is data that has a standard national definition, is collected on a national basis by all program implementers, and is included in the national oversight database.

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Using the current framework we can target integration and public reporting attention on those cases which are most likely to have real significance. If we were to start including CESQG notification data where there is no program activity which corresponds to those core data values, this would simply cloud the national picture as there is no national notification requirement and that data would not be nationally consistent across all States. At the same time, we also need to ensure the public has clear and accurate information about the data which our national systems provide and how they should be viewed in relation to other data sources. As the result of your memo, OSW staff is working with Envirofacts representatives to review the current Envirofacts metadata about CESQGs in RCRIS and to develop more clear descriptions of how that CESQG data should be viewed.

Maintaining a complete inventory of CESQGs at the national level would require a major data quality initiative, and probably regulatory changes to require notifications where State programs do not already have such notification requirements in place for CESQGs. Further, reflecting at the national level all program activity related to CESQGs regardless of whether or not it corresponds to the agreed upon core data values, would be a major system and information management change. The best avenue for making the case for pursuing such changes on a national basis would be within the current information needs analysis process being conducted under WIN/INFORMED for Universe Identification and Waste Activity Monitoring.

Finally, outside of any discussion of the priority for such major changes relative to other RCRA data, resources are simply unavailable, as I am sure you understand. Our resources are fully dedicated to completion of our current platform conversion work for RCRIS. Between the intense efforts underway to meet our tight deadlines, as well as the need to limit changes to the current RCRIS system due to Y2K issues, we are unable to undertake any RCRIS changes this year.

I hope this information, in addition to the discussion held between our staff, helps clarify this issue. Your request is entirely appropriate to raise within the WIN/INFORMED process. We do agree on the importance of your goals and share your interest in improving the quality of our national data (starting with that data of most public and programmatic importance) and the usefulness of that data within the context of broader Agency information resources.

cc: Michael Shapiro  
Devereaux Barnes  
Tony Jover  
Judith Kertcher  
Betty Inge  
Michael Barrette  
David Meredith  
Debbie Goodwin



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 19 1999

MEMORANDUM

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

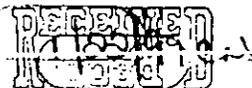
Subject: Request for change in RCRIS Database Policy  
To: Elizabeth Cotsworth, Director  
Office of Solid Waste  
From: Elaine G. Stanley, Director  
Office of Compliance

In the process of streamlining and modernizing RCRIS, the Office of Enforcement and Compliance Assurance (OECA) understands and supports many of the changes that have been made to eliminate unneeded data elements. However, we are concerned about a change made in 1997 that has eliminated mission critical information for Conditionally Exempt Small Quantity Generators (CESQG's). In keeping with previous comments submitted by OECA to your office, OECA is requesting that OSW discontinue the practice of deleting records for CESQG's. This change will allow the RCRIS database to support ongoing OECA activities, and meet the needs of several Agency initiatives. The CESQG data is critical to OECA's efforts to monitor compliance activities and rates at these sources. The lack of this information in RCRIS is also impacting the Agency's credibility in terms of public data access, and is hampering data integration efforts under the Facility Identification Initiative. Below are several recent examples of how the lack of CESQG data has impacted EPA programs.

Data Integration

Under the Facility Identification Initiative (FII), the Agency has committed to developing a system so that database users can easily see what permits and regulations apply to individual facilities. The first step in this process includes the integration of TRI, RCRIS, and PCS facility records based upon submissions that are received to the TRI program. OECA and OPPT recently completed an analysis of these linkages, and found that approximately 700 RCRA handler ID numbers reported through the TRI process were not in the RCRIS national database. After sending a letter to the facilities asking that each RCRIS number be checked and re-submitted, OECA discovered that many of these ID numbers were in the Regional RCRIS databases, but not in the national database because they were CESQG's. This data gap does not allow the Agency to properly verify the linkage information that will be critical to the operation of the FII initiative. Additionally, when the FII database is activated, it is important that the public is able to locate records for all links included in the database.

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### Public Access

We have received many phone calls from regulated RCRIS facilities that are concerned about citizen suits under the RCRA program. The concern is based upon the fact that EPA posts data on the Internet (on the EnviroFacts site) that is represented as the definitive source for information about regulated facilities and permits. Many CESQG's have gone onto the EnviroFacts site, and have not found their name (because EPA HQ has deleted their records). The concern is that unwarranted inquiries, and/or citizen suits will arise because the public will assume that the lack of data on the Internet means that the facility has failed to notify the EPA regarding their waste operations. OECA believes that public access to data is an excellent way to bring the public into the compliance process; however, if databases are not complete and accurate, many problems may occur.

### Government Performance and Results Act/Success Measurement

OECA has been very active in developing new performance metrics that will eventually be used to measure performance. A critical part of these efforts involves the measurement of enforcement and compliance activities that are conducted by the Regions and states. When CESQG's are removed from the RCRIS database, OECA is not able to accurately measure the work that has been performed at these facilities. In addition, we are unable to perform compliance rate analysis. As we work with your office to develop better facility universe and performance measurement approaches, it will be increasingly difficult unless national databases contain a complete listing of all regulated facilities.

My understanding is that adding back the CESQG data has no impact on what is collected from the Regions or states, but simply involves not deleting the records when they are uploaded into the national oversight RCRIS database. In fact, not running the existing delete program will streamline the existing process of getting the national database updated. Please consider this request, and contact me if you would like to discuss this in more detail. If your staff needs more information or has questions, please contact either Michael Barrette, or Debra Goodwin of my staff.

cc: Mark Day  
Eric Schaeffer  
David Nielsen  
George Bonina  
Mike Holman  
Janette Petersen  
Bill Sonntag  
Art Koines  
Myra Galbreath