**ASTSWMO POSITION PAPER
ON RCRA SUBTITLE C HAZARDOUS WASTE PROGRAM INFORMATION AND
RCRAINFO DATABASE OPERATION AND MAINTENANCE**

BACKGROUND

Since the enactment of the Resource Conservation and Recovery Act (RCRA) in 1976 and subsequent amendments, the U.S. Environmental Protection Agency (EPA) has developed and maintained several information systems. These evolving information management systems are necessary for tracking and maintaining information pertaining to the multitude of sites around the country involved in the generation, transportation, and management of hazardous waste.

In the mid 1990's, EPA and the States and Territories (States) recognized the importance of reassessing the information needs of the RCRA Subtitle C Hazardous Waste Program. To meet these needs, EPA and the States established the collaborative WIN/INFORMED initiative in 1996. Results of this project included design, development, and implementation of recommended changes to the information system now known as RCRAInfo. The foundation for this collaborative effort was created through the Waste Information (WIN) initiative by EPA and the Information Needs for Making Environmental Decisions (INFORMED) initiative by the States.

The WIN/INFORMED project consisted of the evaluation of six different aspects of the RCRA program which included: Program Evaluation, Universe Identification, Waste Activity Monitoring, Handler Monitoring and Assistance, Permitting, and Corrective Action. These categories translate into what are presently referred to as the Handler, Compliance Monitoring and Evaluation, Permitting, and Corrective Action modules of RCRAInfo.

The next major upgrade to RCRAInfo through the WIN/INFORMED project was the enhancement of the Permitting and Corrective Action modules. In December 2008, most of the recommended changes for these two modules were implemented through the release of RCRAInfo Version 4.0 (V4). Additionally, two new modules were recommended and approved for development and deployment in RCRAInfo. The Geographical Information System (GIS) module was implemented with RCRAInfo V4 in December 2008, but release of the Financial Assurance (FA) module was delayed. EPA opted to incorporate feedback received during the National RCRAInfo User Conference and present the new module in spring 2009.

In 2009, RCRAInfo Version 5.0 (V5) design changes addressed the implementation of the Definition of Solid Waste (DSW) and Subpart K Academic Laboratory Rules. Additionally, the enhancement requests to the Handler and Biennial Report (BR) modules from the user community and recommendations from the Change Management Process were included in V5.

Presently, EPA is developing Version 6 of RCRAInfo. The goals of this redesign are:

- Take advantage of new technologies which are integral to the e-Enterprise initiative.
- Maintain current functionality but think creatively to meet additional user needs.
- Enhance the user experience.
- Improve performance, data quality and security.
- Address outstanding issues in User Support Issue Tracking System (USITS) and Change Management.
- Re-evaluate the 2010 list of web services that allow States to retrieve their data.
- Develop additional web services, per the National Program Manager's (NPM) guidance since 2011.
- Reduce costs (maintenance, Windows Communication Foundation, etc.).

EPA has also endeavored to expand information management through various web applications such as myRCRAid. RCRAInfo, the reference database system, is the key source of information for other environmental information systems which are widely used by both the public and governmental agencies. For example, the Enforcement and Compliance History Online (ECHO) website and RCRAInfo Web pull data from RCRAInfo. With over 4 million public queries per year on the ECHO web site, correcting data the public claims is in error requires EPA's definitive support.

Looking to the future, the focus on information management is vetted in newly promulgated regulatory requirements. E-manifesting was approved on October 5, 2012 and the proposed user fee rule was signed by the EPA Administrator on June 27, 2016. Efficient and accurate information is paramount and a fundamental component of EPA's e-Enterprise initiative. Thus, it is essential to preserve the improvements that EPA and the States have accomplished to date and to maintain RCRAInfo as a modern data management system into the future.

ISSUE

Despite the efforts made by EPA Headquarters information management staff, personnel resources supporting and maintaining RCRAInfo have become so limited in recent years that proposed projects, changes, and improvements to RCRAInfo tend to get delayed or do not occur in a timely manner. These resource limitations also place significant strain on pre-deployment testing needs and routine, but necessary, user support functions.

The States recognize that a certain amount of time and effort will always be required to address routine glitches and bugs in an electronic data system. However, the States are greatly

concerned that current circumstances could deteriorate even further to the point that EPA RCRAInfo resources will not be able to maintain and support information needs that are vital to the RCRA Subtitle C Program.

The RCRAInfo information management system plays a critical role in the effective operation of the overall RCRA program. This role is highlighted in the findings of the report, **State RCRA Subtitle C Core Hazardous Waste Management Program Implementation Costs,** completed by the ASTSWMO Hazardous Waste Subcommittee in January 2007. As described in this report, "EPA puts major emphasis on data management activities, as they are the source of all information in the universe for the RCRA Subtitle C Hazardous Waste Program. Information on RCRA C programmatic activities being conducted in the States is essential to EPA's accountability efforts. Considering the importance to EPA of these endeavors, it is clear that EPA funding for these critical activities does not match the resources being expended by the States to conduct them. EPA needs to recognize the importance of RCRA data management and other program development activities and fund them appropriately." Further, the report concludes that, "Data management was identified as the second most costly function of implementing a State RCRA Subtitle C Core Hazardous Waste Management Program. Clearly, timely and accurate information on RCRA Subtitle C programmatic activities is essential to EPA and States' program reporting and accountability efforts. The overall importance of RCRA program data management must be recognized and funded appropriately."

POSITION

It is the position of ASTSWMO that EPA should continue to support critical information management needs of the RCRA Subtitle C Hazardous Waste Program through appropriate resource allocation for maintenance and development of RCRAInfo and the emergent e-Manifest System in the following ways:

- Provide sufficient funding to ensure the number of RCRAInfo and e-Manifest staff positions will remain stable and at a level that will allow them to make necessary module changes and upgrades, revise and add reports as needed, and provide regular training and assistance. This will be especially critical with the upcoming major changes to information collection and management via RCRAInfo V6, which will have at least two new external modules (BR) and a functional myRCRAid), and the entirely new integrated e-Manifest system.

- Continue to partner and collaborate with State programs to ensure that information needs for the RCRA programs are being met and that staffing levels are stable enough that programs can be implemented.

- Ensure that RCRAInfo remains technologically current, thus ensuring that States and Regions will continue to use it as their main source and repository of hazardous waste information.

- Ensure that the changes and enhancements to RCRAInfo are made in an expedient and reliable manner that is both timely and at consistent intervals to allow the data provided and distributed to be of the highest quality.

- Ensure that there is adequate funding for training of State and Regional staff. Accurate data entry is essential for maintaining good quality data that will serve the needs of the public

- Continue to ensure that, through the use of training, good software design, and appropriate QA/QC reports, the content of RCRAInfo is of the highest quality.

- Work with the Office of Environmental Information and Office of Enforcement and Compliance Assurance to make certain the information from RCRAInfo is provided to the public in a timely and accurate manner.

- Ensure that the Change Management Process, with referrals from the User Support Issue Tracking System (USITS) within RCRAInfo, remains the only mechanism to facilitate change to RCRAInfo.

- Continue to ensure RCRAInfo has sufficient flexibility to allow States and Regions to track implementer-specific events while maintaining enough uniformity for consistent national reporting.

- Continue to create and revise reports and data services to meet the needs of the States, Regions, Headquarters, and Congress.

- Continue to coordinate outbound reporting through subsidiary federal data systems such as RCRAInfo WEB, ECHO and Envirofacts, thereby providing adequate report-out of environmental data to the public user base.

- Ensure that RCRAInfo continues to be easy to use for both data input and data retrieval and is easy to understand.

- Continue to communicate and work with the RCRAInfo Change Management Process groups, the ASTSWMO Hazardous Waste Program Information Management Task Force (PIM TF), States, Regions, ECOS, and the public concerning the use of and changes to RCRAInfo.

- Consider creative and innovative ways to expand and incorporate more direct assistance and input from EPA Regional representatives and the States.

The ASTSWMO Board of Directors recommends that EPA Office of Resource Conservation and Recovery conduct an assessment to determine the resources needed to provide adequate and continuing support of information management in the RCRA Subtitle C Hazardous Waste Program in general, and the RCRAInfo information management system in particular. Such a resource assessment should identify the resource needs, set priorities for those needs, and establish a clear path forward to meet those needs. The ASTSWMO Hazardous Waste PIM TF is willing to participate in this assessment and to provide input, support, and assistance in any way possible.

Approved by the ASTSWMO Board of Directors on October 25, 2016, in Washington, D.C.