RCRAInfo V2.0
Final High Level Design Summary
and
Response to RCRAInfo User Community Comments
on the
Proposed High Level Design

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Purpose of this Document

This document was developed by the RCRAInfo V2 Design Team to summarize and communicate the final high level design for RCRAInfo V2.0 to the RCRAInfo User Community.

Included in this document are:

- summaries of the V2.0 design changes to the Handler and Waste Activity Reporting Modules. The summary for each module was updated to include the final changes to the design and reflects the User Community's comments on the proposed design;

- responses from the Design Team to the comments received from the RCRAInfo User Community on the proposed design changes to RCRAInfo. The proposed changes were outlined in the following document: ***Proposed Design Changes to RCRAInfo to Address the WIN/INFORMED Universe Identification and Waste Activity Monitoring (UID/WAM) Program Area Analysis (PAA) Results, June 15, 2001***;

The following RCRAInfo V2.0 documents are available on the RCRAInfo web site http://www.epa.gov/oswfiles/rcrainfo/version2.htm) for reference when reviewing this document:

- *Proposed Design Changes to RCRAInfo to Address the WIN/INFORMED Universe Identification and Waste Activity Monitoring (UID/WAM) Program Area Analysis (PAA) Results, June 15, 2001*

- RCRAInfo V2.0 Structure Charts
  - Handler Module
  - Permitting Module
  - Waste Activity Reporting Module
  - Handler Reporting Table (HReport_Univ) and GPRA Tables

- Crosswalks from the current RCRAInfo structure to the RCRAInfo V2.0 structure:
  - Handler Module
  - Waste Activity Reporting Module

- *RCRA Subtitle C Site Identification Form*

- ***RCRAInfo V2.0 Conversion Rules*** paper (will be available in early May 2002)

- ***RCRAInfo V2.0 Handler Reporting Table: Hreport_Univ***

Final Design Summary: Handler Module

The following provides an overall summary of the V2.0 design changes to the RCRAInfo Handler Module.

Implementation of the new Site Identification Form

The existing ***Notification of Regulated Activity Form*** (8700-12), and the site identification portions of the ***Hazardous Waste Permit Application, Part A*** (8700-28) and the ***Hazardous Waste Report, Identification and Certification (IC) Form*** (8700-13A/B) have been replaced with a new form titled ***RCRA Subtitle C Site Identification Form*** (*Site ID Form*). The remainder of the Part A Permitting Application will be replaced with a new form titled ***Hazardous Waste Permit Information Form*** (8700-23) (*Permit Form)*. The *Site ID Form* and the *Permit Form* will begin to be used by the regulated community for Notification and Part A reporting requirements as soon as the RCRAInfo V2.0 software is released (current release date is June 2002). (**Note:** Sections 8, 9, and 10 of the new *Permit Form* will now be entered in the Permitting Module. The *Permit Form* is still under development by OSW's Analysis and Information Branch, but, should available before the end of May, 2002. Please contact Dave Levy of OSW's Analysis and Information Branch (levy.dave@epa.gov) for more information regarding the *Permit Form*.

The PAA Team requested the ability to maintain additional history on Handler data. In order to accommodate this recommendation, and the integration of the Biennial Report data, the entire *Site ID Form* will be saved as one "record" or "snapshot", thus maintaining history for everything. Each time a site submits a *Site ID Form*, the information will be entered into the **HHandler2 Table** as a separate record, using a sequence number to track history. The **HPrevious_Name Table** is no longer necessary and will be archived/removed from RCRAInfo.

A data field was added to the *Site ID Form* to capture the Country for the Site Mailing Address. A new MAIL_COUNTRY field was added to the **HHandler2 Table** and for consistency purposes, CONTACT_COUNTRY AND PCONTACT_COUNTRY were also added to the **HHandler2 Table**.

Because the new *Site ID Form* will also be used for Hazardous Waste Reports, new data fields were added to the Handler Module (Include_In_National_Report and Report_Cycle) and a link was added from the Handler Module's **HHandler2 Table** to the **BReport_Cycle Table** in the new Waste Activity Reporting Module. The Include_In_National_Report field in the **HHandler2 Table** of the Handler Module will be used by Implementers to designate at a **facility level** those facilities that should be included in or excluded from National Biennial Reports. **Note: additional program guidance on the use of the Include_In_National_Report field will be provided by OSW's Analysis and Information Branch (AIB) in May 2002.**

To track multiple people certifying the accuracy and completeness of their *Site ID Form*, the **HCertification Table** was added to the Handler Module.

Owner/Operator Information

The definition of the Owner_Operator_Change_Date field in the **HOwner_Operator2 Table** has changed. The definition for this field now means that you must fill in the date when the owner or operator ***became the current*** owner or operator and when they ***ceased to be the*** owner or operator. This is different from the existing definition which requires that you enter a date only when the existing owner or operator is ***no longer current***. The date field for when an owner or operator became current has now been split into two separate fields, **Date_Became_Current** and **Date_Ended_Current**. A field identified by the PAA Team as "shared", Dunn_Bradstreet_Number , was also added to the **HOwner_Operator2 Table**.

Contact Information

The structure of contact data was troublesome in RCRIS and still is troublesome in the current version of RCRAInfo. Each contact record has a contact type, which seem to correspond to source types because some contact types are 'N', 'A', 'E', etc.... However, there is no structural correspondence. The V2.0 structure allows the existence of a contact type 'A', for example, for a Handler that doesn't have a Part A (source A) record. The V2.0 structure places contact information in the **Hhandler2 Table**, where every record has a source. Contact data will be directly associated with source. The **HContact Table** will be archived / removed from RCRAInfo.

Latitude and Longitude Data

To comply with EPA's locational data standards, additional fields were added to store locational data for all RCRA sites. The existing **HLatitude_Longitude Table** was also merged into the new **HHandler2 Table**. The **HLatitude_Longitude Table** will be archived / removed from RCRAInfo.

Source Data

The PAA Team recommended consolidating the existing '**E - EPA**' and '**S - State**' sources into one source called '**I - Implementer**'. All Handler data entry and translation will be based on the Handler Implementer of Record (IOR) settings. To identify the reason the *Site ID Form* was submitted by the regulated community, the allowed values for **Source_Type** will be: **'N' - Notification**; **'A' - Part A**; **'R' - Hazardous Waste Report**; **'B' - Both Notification and Hazardous Waste Report**; **'E' - Emergency**; and **'T' - Temporary.** The existing **HSource Table** was also merged into the **HHandler2 Table** and the **HSource Table** will be archived / removed from RCRAInfo.

Activity Data

The PAA Team recommended changing the format of the activity fields to make them consistent and defined all activities as "YES (Y) / NO (N)" fields, except **Fed_Waste_Generator** and **State_Waste_Generator**, which will retain their various RCRAInfo V1.0 values (e.g., '1', '2', '3'). In addition, new activity fields were added: **Importer_Activity, Transfer_Facility, Universal_Waste_Dest_Facility, and Mixed_Waste_Generator**. The **HActivity Table** was also merged into the **HHandler2 Table** and the **HActivity Table** will be archived / removed from RCRAInfo.

Universal Waste Activity will be captured in a separate table called **HUniversal_Waste**. This waste type will include a Generated Indicator and / or an Accumulated Indicator and will have its own lookup table (**Lu_Universal_Waste)** for Implementer-defined wastes.

A new table will be created for Implementers to define their own specific activities. The table is called **Lu_State_Activity**. Maintenance of this table will be handled in the same way as all other implementer defined lookup tables.

The capability will now exist to track both the State and Federal Generator Status for every site. Tracking the Federal status is mandatory, while tracking the State status is optional. Implementers will report their status as defined by their own regulatory definitions and they will report the Federal status as defined by the Federal regulations. These two fields will be derived by the new lookup table (**Lu_Generator_Status2**) that will be linked to the **HHandler2 Table**.

Conversion from SIC to NAICS Codes

The **HSIC Table** will be replaced with the new **HNAICS Table**. The V2 Design Team has provided their recommendations for the mapping of the current SIC codes to the NAICS Codes. You will find a copy of the Design Team's recommendations in the paper titled ***RCRAInfo V2 Conversion Rules***, which will be available in May 2002.

Environmental Priority Ranking Table

The **Henv_Priority_Rank Table** will be archived/removed from RCRAInfo, but, will be available for reporting for those few States/Regions that still refer to that data.

Tracking Hazardous Waste Exports

The PAA Team recommends integrating hazardous waste export data from OECA's Hazardous Waste Exports System (HWES) into RCRAInfo on a biennial basis. Additional fields will be added to the **HHandler2 Table** of RCRAInfo to accommodate this information at a later date (2003) when the logistics of how and when this data will be integrated into RCRAInfo are determined.

Tracking Hazardous Waste Imports

The PAA Team plans to add a new data element, Country_Of_Origin, to the ***Site ID Form*** when the Information Collection Request (ICR) is renewed in 2003, therefore, the data element will not be added to RCRAInfo at this time.

Previous EPA IDs

A new table will be created so that implementers can link back to previous EPA IDs that were created for one specific site. This table is called **HPrevious_ID.**

Complete List of Data Elements to be Archived/Removed

Please refer to the V2.0 Handler Module Crosswalk (http://www.epa.gov/oswfiles/rcrainfo/version2.htm) for a complete list of data elements that will be archived/removed from the current Handler Module.

Final Design Summary: Waste Activity Reporting Module

The following provides an overall summary the V2.0 design changes to the RCRAInfo Biennial Report Module.

The design of the new Waste Activity Reporting (WAR) Module was driven by three primary needs:

1. Adjust the database structure to accommodate the new data requirements based on the ***2001 Hazardous Waste Report, Instructions and Forms (2001 BR Forms)***;

2. Integrate waste activity data into the new Handler Module structure; and

3. Integrate the UID/WAM PAA Team's recommendations for improving data quality.

The changes to the data requirements for the ***2001 BR Forms*** include adoption of the new ***RCRA Subtitle C Site Identification Form (Site ID Form)***, which replaced the existing ***Identification and Certification (IC) Form*** beginning with the 2001 Biennial Reporting (BR) cycle. The new WAR Module data structure integrates into the revised Handler Module structure by storing the ***Site ID Form*** submitted as part of a Biennial Report submission in the **HHandler2 Table**, and then referencing the **HHandler2 Table** for the other WAR Module data tables. This effort to integrate the Biennial Report data also includes removing the separate Comments and Descriptions Tables in favor of using various Notes and Descriptions columns used for RCRAInfo data entry.

Changes to existing coding structures for Form Codes, Source Codes, and Management Method Codes will be accomplished by changes to the existing lookup tables and the creation of new lookup tables. Refer to the ***2001 BR Forms*** for complete lists of the new Form Codes, Source Codes, and Management Method Codes (http://www.epa.gov/epaoswer/hazwaste/data/brs01/forms.htm). The Data Elements and Codes used in previous BR cycles will be archived/removed. Please NOTE that Source Code data is now "National" and, therefore, mandatory.

Several data elements previously collected have been deleted (Point of Measure, Offsite Availability Code, SIC Code) from Form GM and will be archived/removed. The NAICS Codes, which replace the SIC Codes, are now accessible via the new ***Site ID Form,*** and stored in the new **HNAICS Table** in the Handler Module. The PAA Team also deleted Origin Code from Form GM and recommended deletion of the corresponding data element in RCRAInfo.

The structure of the WAR Module was also changed to archive/remove the **BWaste_Information Table.** Due to the platform conversion (from BRS) and the guidance from the PAA Team, the **BWaste_Information Table** is no longer needed.

To accommodate the PAA Team's recommendations for improving data quality, erroneous data will no longer be accepted for optional data elements (e.g., Form Code on Form GM). All optional data elements must either meet the nationally defined code lists, or not be provided to EPA for inclusion in the RCRAInfo National Database. This requirement will be implemented with a combination of lookup tables and edit checks in the BR data load software in RCRAInfo. Further, during the data conversion to RCRAInfo V2.0, all invalid code entries will be deleted from the existing data in the RCRAInfo National Database (although they will remain available in the archive table). Note: an effort will be made to convert as many of the invalid codes as possible. Please refer to the ***RCRAInfo V2 Conversion Rules***, which will be available in May 2002, for more information.

The Include_In_National_Report field in the **BGM_Basic Table and BWR _Basic Table** of the WAR Module will be used by Implementers to designate, **at the waste level**, those wastes that should be included in or excluded from National Biennial Reports. These fields must be set in conjunction with the Include_In_National_Report field in the **HHandler2 Table**.

Note: additional program guidance in the use of the Include_In_National_Report field will be provided by OSW's Analysis and Information Branch (AIB) in May 2002.

Complete List of Data Elements to be Archived/Removed

Please refer to the V2.0 Waste Activity Reporting Module Crosswalk http://www.epa.gov/oswfiles/rcrainfo/version2.htm) for a complete list of data elements that will be archived/removed from the current Biennial Report Module.

RCRAInfo V2.0

Design Team Response
to
RCRAInfo User Community Comments
on the
Proposed High Level Design

The following outlines the responses from the RCRAInfo V2 Design Team to the comments received from the RCRAInfo User Community on the proposed design changes to RCRAInfo. Similar comments from multiple organizations have been grouped together, followed by a single response from the Design Team that addresses the issues and/or questions raised in the comments. The proposed changes were outlined in the following document: ***Proposed Design Changes to RCRAInfo to Address the WIN/INFORMED Universe Identification and Waste Activity Monitoring (UID/WAM) Program Area Analysis (PAA) Results, June 15, 2001*** (http://www.epa.gov/oswfiles/rcrainfo/version2/hld_final_0601.pdf).

Comment 1 - Premise of "National', "Shared" and "Organization-Specific" information

AL — Alabama generally agrees with the basic premise of 'national', 'shared', and 'organization-specific' information, including the fact that a national data system cannot be designed to specifically address everyone's 'organization-specific' needs. However, Alabama also agrees strongly that, where practical, the national database should incorporate a flexible design which will accommodate most implementer needs, such as through the use of Lookup tables for various fields which allow for 'implementer defined' codes. To do otherwise will greatly reduce the flexibility and utility of the system to meet implementer needs, and will result in greatly reduced utilization of the system, which will ultimately impact data quality.

CO — The definition of "shared" is nationally defined. It seems the UID/WAM interpreted this as defined by Federal regulations and not nationally defined by the User Community. The RCRIS/RCRAInfo DED is a national definition of field values that are used consistently by the regulated community. A survey should be sent to the User Community to see which field values that are currently being changed or removed/archived are wanted by a majority of Users. If most Users want to be able to identify a *merged* EPA ID number, a *commercial* transporter, or a specific reason why a generator is not regulated, then these field values should remain as Nationally defined.

GA — The entire redesign process seems to rely on most States being able to set up their own systems to carry data outside RCRAInfo as needed. We currently rely only on RCRAInfo and do not have the resources or expertise at the state level to do this.

MI — When the original WIN/Informed UID/WAM report was issued I distributed it to a few hazardous waste staff in Michigan (in Michigan we do not have separate data entry staff, rather inspectors, permit engineers, and geologists enter their own data). They all understood that the list was the final list of data elements and we concurred that the elements being removed were not needed by Michigan. We are still of that opinion. Additionally, and more importantly, staff here fully support the concept of "National" and "Shared" data elements in RCRAInfo that (1) are defined, (2) clearly indicated which are required and which are not, and (3) everyone can see the data. We agreed that too many of the data elements in RCRAInfo are not well defined and that it appears are used in different ways. You have to be able to have some level of confidence that the date entered under each data element is based on the same definition. Nevertheless, we did support the idea that implementors would be able to have their own data elements, "organizational-specific" linked to and possible stored (but not maintained) at NCC. This way they could add their own data they need to run their program but it would not be available data for others to view (including EPA). I believe that some suggestions are in the PAA teams report.

NE — Nationally Defined Data Elements vs. Site Identification: All categories of types of generators, marketers of used oil, universal waste handlers, etc. need to be a pertinent part of the core/required data elements accurately defined as required fields in the Nationally Defined Data Elements. It concerns me that not all activities are pla nning on being tracked. That is one of the starting points in RCRA, to inform the state or region where generators are located, and what types of hazardous waste activity occurs at the site.

DT Response: ***The Design Team believes the national system should have a flexible design which will accommodate most implementer needs (e.g., the use of Lookup Tables for various fields which allow for 'implementer-defined' codes). This will greatly increase the utilization of the system, which will ultimately impact data quality. Specific cases where the Design Team chose to retain fields in RCRAInfo that were proven to be widely used by User Community are noted below. Also see response to Comment 4 - Tracking Implementer-Specific Activities***

Comment 2 - Retaining State District, Acknowledge_Flag, Acknowledge_Date, and Owner/Operator Address data elements

AL We agree that the four fields listed on page 4 by the design team should be retained in the updated structure.

AR Arkansas disagrees with removing State_District; Acknowledge_Flag, Acknowledge_Date, and Owner/Operator Address data elements from RCRAInfo. We use three of the four data elements here in Arkansas for acknowledge letters. We are contemplating using the State_District codes for making our reports more manageable.

GA We currently use the acknowledgement flag and date to send RCRA notifiers or subsequent notifiers letters acknowledging the action (or to let others know we have deactivated their number at their request). The ability to set the flag to different values allows us to generate separate files for different types of form letters. The date allows us to verify when information was sent to facilities when we receive inquiries. While we do not currently use State District as it was intended, we began using it in RCRIS to track internal facility assignments and it has proven extremely useful to us and the public (they are able to determine who they need to contact on assigned facilities).

ID Idaho strongly disagrees with the PAA proposal to eliminate the State District and Owner/Operator Address data elements. Since Idaho does not maintain it's own separate information system, nor does it have the resources or legislative approval to develop one, Idaho will be at a loss to track and provide the necessary information without the State District field. This will create an unnecessary increased burden on both Idaho and EPA Region 10.

IL If pre-populated forms can work at all, it is essential for the acknowledgment flag and date field to remain in RCRAInfo. Without these fields, management of pre-populated forms would not be feasible as there would be no way to determine which sites were sent forms and when they were sent. In addition a field to track the responses would simplify the management of the forms. Illinois believes it is necessary to be able to track owner and operator, when different from the location address.

KY Kentucky's whole Annual Registration Program is maintained from State District. All Kentucky reports are generated using the State District field. Kentucky has 120 counties with 10 District Offices. All data (Notification, Permitting, Compliance, and CA data) is sorted by District and sent out to our District Offices. Most of Kentucky's Freedom of Information Requests are sorted by District. In the last month, Kentucky hired an Oracle Programmer to develop reports sorted by district that we use to have in RCRIS. Kentucky does not have the resources or the expertise it takes to develop and maintain an Oracle table for the field.

Kentucky maintains a current owner address for every RCRA handler. The information is very important for us.

NE Owner/Operator Address/Phone: When an owner is not physically at a location (or mailing address), of the facility, the ownership clearly identifies how to reach the owner. If there is enforcement and ultimately cleanup of RCRA sites in the future, the liability of cleanup goes back to the current and sometimes previous owners of the generating company. Therefore, it is vital to continue to collect this information. Currently the historic ownership has not been functioning in RCRAInfo thus the inability to handle multiple owners.

NJ The STATE_DISTRICT field is of use to New Jersey because we have several field offices and this field makes it easy for us to retrieve data based on the region.

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

State District: Some States divide programmatic responsibilities among State district offices, and use the same divisions for data responsibilities. When an EPA or State person has programmatic or data inquiries about a specific handler, s/he must contact the district office that is responsible for the handler. In New England, districts are made up of towns, but RCRAInfo does not propose to supply a town/district crosswalk - and shouldn't bother Users with such nuisances. Elsewhere district boundaries may be arbitrary and changeable.

Acknowledgment flag and date: We send an acknowledgment to every RCRA notifier or re-notifier to tell it the RCRA ID that we assigned it. Now that the PAA has proposed pre-populated Site ID forms, we plan to use something like them as acknowledgments so the notifier can review what was keyed and advise us of any errors or changes. In fact, we have developed our own form so we can begin this excellent practice now, and so we can include State-only information. Generating acknowledgment takes considerable time, but we consider it essential. This work is eased if we can simply check an acknowledgment flag during data entry and then have acknowledgment-reporting software select handlers flagged to get acknowledgment and set the acknowledgment date to say when the acknowledgment was generated. We need acknowledgment dates to respond to inquiries from the Handler or the State about the status of a notification acknowledgments and for Q/C.

Owner/Operator Address: When several family members share a name, address clarifies identity. When an owner is not physically at a location (or mailing address), address allows us to reach the person, and establishes who, in a world of 'Jane Smiths', they are. Reporting and keying burden for this information is small because those filling out a form or keying into RCRAInfo can often click the 'Same as location' or 'Same as Mail' boxes.

Region 2/NY

Do not delete STATE_DISTRICT. NY and NJ use this data field for sorting reports within NY (9 offices) and NJ (4 offices) by State Regional/Field Office. These State Environmental Regional/Field Offices cover a number of counties (NY having 65 counties and NJ having 34 counties). Removal of this data field will result in the loss of easily retrieving information for each regional/field office specific to them only. In addition to NY and NJ, FL, TX, CA and WI use this data field for the same purpose.

Do not delete ACKNOWLEDGE_FLAG. Region II uses the Acknowledgment flag for two purposes: (1) to process new notifications, enter value of "A" and then reset to blank once the Acknowledgment letter has been sent out and (2) provide duplicate copies of upon request of Notifications to notifiers by entering a value of "C", which is then reset to blank once the copy has been sent out. Region II realizes that this may be different than other implementers processing, however, Region II has expended a great deal of effort in perfecting their system. The Region II system uses the Acknowledgment Flag as the sole indicator for selecting weekly acknowledgments to be processed, which is defined in the HQ DED as: Acknowledgment Flag - a flag used to indicate that an acknowledgment be sent.

Do not delete ACKNOWLEDGE_DATE. Region II uses the ACKNOWLEDGE_DATE to track when the Acknowledgment is actually sent by Region II to the Notifier. There is no other substitute field that Region II could use for this purpose. Region II is able to gauge its efficiency in responding to its regulated community by comparing the Notification dates with the Acknowledgment dates.

Do not Delete Owner/Operator Address data elements. The June 16, 2001 "Crosswalk of Current to Proposed Structure for the Handler Module" does not show deletion of any data elements. Region II fails to understand any advantage to deleting these data elements. Facilities can choose to write "same" for Contact, Owner and Operator if they are all the same as the Facility information. However, do to the complexities of business management, it is necessary to have all these data elements to properly handle all the possibilities of adequately describing a RCRA Handler facility.

Region 6 Region 6 strongly agrees that some data elements defined by the UID / WAM PAA as "Organizational Specific", namely STATE_DISTRICT, ACKNOWLEDGE_FLAG, ACKNOWLEDGE_DATE, and Owner / Operator Address data elements, should remain in RCRAInfo. Owner / Operator and Contact address information must likewise remain, not only as less of a burden than the data not remaining, but possibly from an Enforcement standpoint. When a facility is in violation or abandoned it is critical to have a complete history of owners and contacts, past and present and their last known address information. It would be difficult, if not impossible, to locate all responsible party's if we do not collect and maintain an unbroken trail on Contacts, Owners and Operators.

Region 7 The state district code, Acknowledge_Flag, and Acknowledge_Date are not used in Iowa. We question the decision on eliminating the address of the Owner / Operator. Why have the Owner / Operator at all if we can't tell where they are located? I assume it is because the fields were not placed on the new Site Identification Form, but we question that decision.

Region 9 The owner and operator address information should be kept. This information is not used often but would impact mailings.

Region 10 We want to keep the State district code, since this is the method the Region 10 and Region 10 States use for our reports to designate the separate State offices around the States.

VT Owner / Operator address - We do not agree with the removal of the owner / operator address from the form and the data base. This information is not captured anywhere else (that we are aware of) and is crucial in cases where a handler abandons a site or is unresponsive. We like the inclusion of a separate line on the Site ID form for the site operator, since often the owner and operator are different and previously there was no clear indication of which was to be listed on the notification form. But we think that there should be address fields in the data base for the operator as well.

DT Response: ***The State District, Acknowledge_Flag, Acknowledge_Date, and Owner/Operator Address fields will not be archived/removed from RCRAInfo due to strong support from the User Community to retain them.***

Comment 3 - Tracking Multiple Owner(s)/Operator(s) and End Dates

AL The Howner_operator table should also include a field identifying the date an owner / operator is no longer current. Otherwise, there is no positive indication in the data that a given owner / operator is no longer active at a site. In this day of acquisitions, mergers, and partnerships, just because a new owner / operator is added does not mean that a previous owner / operator is no longer applicable.

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)
Confirm that RCRAInfo will be able to handle multiple current owners & operators. It should now, and doesn't. This failure appeared with RCRAInfo and was not present in RCRIS.

We agree that the proposed Site ID Form should collect the date a new owner / operator starts, not, as we do now, the date that the new owner / operator says the previous one stopped. This agrees with other RCRAInfo dates (that refer to the start of something, not the end) and collects better data (because a notifier can better tell when he became an owner than when the previous owner stopped - esp since there could have been several ownership changes during a period of non-RCRA activities). We also agree the current owner / operator dates can not be converted, but should be left for Implementors to report and use as best they can.

We ask for additional nationally-defined values in Howner_operator's Owner_Operator_Indicator: current land owner (CL), previous land owner (PL), current business owner (CB), and previous business owner (PB). Some States collect both land and business ownership and this useful information could readily be stored in RCRAInfo.

DT Response: ***The Current Owner/Previous Owner (CO/PO) indicator tells you whether an Owner is current. A date is not required for a User to know whether a given owner/operator is now a PO. However, due to the prevalent concern about tracking multiple owners and the likely confusion that could result, the Design Team added the* Date_Became_Current** and **Date_Ended_Current *fields to the HOwner_Operator2 Table. This new date will provide a positive indication to the data that a given owner/operator is no longer active at a site. RCRAInfo does handle multiple current owners/operators, and this functionality will be streamlined in RCRAInfo V2.0. [Note: the new* Date_Became_Current and Date_Ended_Current *Owner/Operator fields will not be populated during V2.0 data conversion. The crosswalk distributed with the Proposed Design Changes document was incorrect. The current Owner_Operator_Change_Date field will be archived/removed.]***

The Design Team doesn't have a problem with adding CL/PL, but, how is current (CB)/previous (PB) business owner different from the current owner/operator already available? Some States currently use the Owner/Operator fields to enter this and just indicate property or land owner after the name. This issue can be addressed in the future using the RCRAInfo Change Management Process.

Comment 4 - Tracking Implementer-Specific Activities

AL The replacement of the Hactivity table with individual fields in Hhandler is not acceptable in its current form. Except for State Generator Activity and possibly Universal Waste Activity, it appears that all ability for an implementer to track implementer-specific activities is being removed from the system. This will have a significant impact on Alabama and other States which have state specific notification forms which collect more information than is collected on the federal form. For example, in Alabama, we collect information on the presence of various types of 'permit-exempt' treatment at the facility, in addition to all of the federally specified information and other state specific information. For this reason, we strongly request that the existing functionality to track implementer specific activity information be retained. It would appear that a relatively simple change to the proposed structure would retain the current functionality, while still accomplishing the goal of a simplified national structure.

CO The Design team should convert the activity fields and values that are being deleted to State Defined Values if the IOR or State would like to keep this data in RCRAInfo instead of creating a separate database for handler data that the IOR or State would like to maintain.

MO Some States require additional data items not on the current NORWA or new Site ID form. The need to capture this data will continue. Missouri has a specific regulatory requirement that Missouri sites use the Missouri version of the current NORWA. This is because of additional information captured on the Missouri version of the form (Property owner information and "Hospital" owner type) and a more stringent definition of Large and Small Quantity Generators. This requirement will remain in place.

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

EPA-NE and its States need to share with each other Handler activities that an authorized State regulates. RCRAInfo currently allows us to track State-only generation, transport, TSD of RCRA hazardous waste and also State-only used oil activities: each of these activities has two State-only elements (a 1 character one and a 10 character one). We also can track UO Collection Sites. The UID/WAM PAA proposes to drop all these elements and add a 1-character State view of generation.

In authorized States, all inspections (whether by State or EPA) are done under State regulations, so both State and EPA inspectors need to know the activities for which a handler is regulated. States collect this information on their Notifications (which differ from the federal Notification), and store a copy of it in their File Room. EPA-NE has no copy. (Paper originals may be unavailable, even in the States, when CDXs are implemented.) If EPA implements this PAA proposal, EPA-NE inspectors will be unable to

get information on State-only activities without burdening State staff with the task of faxing / phoning it to them - or using a State system, if available, rather than RCRAInfo.

RCRAInfo could readily accommodate any and all State-only activities if activities were broken into a table by themselves with one row per handler / activity. We ask that this be done. This activity table would be associated with hhandler much as waste codes will be. RCRAInfo would need a new look-up table in which States would define each of their activities. This approach design has the added benefit of simplifying implementation of any new EPA activities.

VT The proposed deletion of many of the handler activity fields for specific activities would limit our ability to track state regulated waste activities. The proposed replacement of having one field for each state and federal status will not capture other activities that may be regulated differently by the federal and state programs, for example TSD facilities that may only treat store or dispose of state-regulated waste. We also use the description fields for each hazardous waste activity to store comments regarding changes in status. Loss of these fields might mean that there is more confusion about changes in status that would have been cleared up if one of the comments in the description field had been checked.

DT Response: ***The Design Team added a new table between the proposed LU_State_Activity Table and the HHandler2 Table called Hstate_Activity. This adds more flexibility to the renamed LU_State_Activity Table the PAA Team recommended to capture Organization-specific generator status definitions that each Implementer will create. This data will be "Shared" with the Regions, as Regions also requested this functionality in their comments to the proposed design. This method was preferred rather than making Implementers create their own tables in RCRAInfo, or tracking this data in separate Implementer-developed systems, because many Implementers don't have resources to tackle this themselves. The Design Team feels this is the least burdensome option to meeting the "Shared" need for this data. The effort for HQ/IMB to initially create this table is minimal and requires no further maintenance by IMB since it is Implementer-defined and maintained. This is optional data, of course, for Translators to load into RCRAInfo.***

Comment 5 - Removal of Waste Stream Table

AL Alabama concurs with removing the 'waste stream' table, and instead directly relating waste codes and process codes through the linking tables.

DT Response: ***Kudos to Alabama who noticed that we took this out.***

Comment 6 - Consolidating 'E' and 'S' records into one 'I' Source Record

Comments Against the Proposed Change:

AR Arkansas disagrees with removing the E and S sources from the system. We were sold the joint system in that we would be able to keep separate views of a facility. Arkansas uses S source records for non-notifiers and facilities that were inspected by complaint investigations that otherwise would not have to notify.

KY Kentucky's generators are on Annual Registration and must complete a new notification every year. So for Kentucky, the Source N record is the most current and up-to-date record in the system. Source S records for Kentucky are non-notifier records and if there were an S and N record then the receipt date would need to be looked at for the current record. Kentucky does not want Source S records combined.

KS Kansas disagrees with the notion that "E-Source" and "S-Source" should be combined into an "I-Source" record. It appears to illustrate a lack understanding of the fundamental applications of RCRAInfo. Those being, the ability for RCRAInfo to maintain autonomy of the implementers data and the maintenance / responsibility for data entered by the originating authority, or IOR. Kansas does not have the resources to enter data into RCRAInfo that EPA -Region 7 generate. Nor does Kansas want to see Region 7 changing IORs in order to facilitate their data entry.

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)
We see no reason to remove the 'E' / 'S' functionality from RCRAInfo since other States and Regions find it useful. Also, we strongly favor explicit ownership / accountability for data, and see a need to track 'E' or 'S' source where both are used. RCRAInfo reports do not show IOR (and it changes over time anyway) so we need the 'E' and 'S' sources to tell who keyed a record (although Userid might also tell this). Comments are not a way to tell: they are not consistent enough for searching and lack edits to ensure that they are keyed.

Region 6 Region 6 disagrees with the proposal to consolidate the existing "E-EPA" and "S-State" sources into one source called "I-Implementer". Data changes can be identified by either EPA or State inspectors. It is our desire that we be able to identify which agency (source) the data came from, if the data is entered into RCRAInfo. The data could result is an update to a current handler, or creation of a new Handler as a "Non-notifier".

Region 7 We strongly object to eliminating the existing "E" & "S" sources in favor of an "I" source. In Iowa, we input data into the Handler module based on EPA inspections (we are the only ones that do them in Iowa). This data includes the current generator status as determined at the time of the inspection, the waste codes, and we update any information that has changed such as mailing address, contact information, SIC code changes, etc. We input some of this data on an E record, and due to some existing limitations in the system, put some data in the N record.

When EPA does inspections in the other three Region 7 States, we enter an E record on the All Data screen to record the date of inspection, the current generator status and the waste codes. Other changes noted by the inspector, such as mail address or contact information are forwarded to the State for updating, since it must be done on the Notification input. We then recalculate the universe based on the most recent data. We are aware that Nebraska objects to this. They do not use anything but the N record, and some time ago requested us to delete all existing E & S records. We have continued to add E records as EPA completes inspections in Nebraska. We see extreme usefulness in having the inspection data available in the Handler Module where we can see when EPA or the State has done the inspections. Both Kansas and Missouri cooperate with us in using the E & S records.

Region 9 Converting the E and S records into I would make it difficult to decipher the responsible agency.

Comments For the Proposed Change:

CO Colorado supports combining the E and S source records into an Implementer Source record. This will make the handler data consistent and keep the IOR informed of handler changes that the co-implementer requests. Having an "I" source allows data to be entered in a standard format and updated in accordance with only the IORs policy. The CME module can track all inspections done by co-implementers.

ID Although Idaho does not have concerns about EPA overwriting Idaho's data, Idaho does have concerns about the rumored statement that the non-notifier flag could possibly be removed. Idaho has a need to be able to track state-assigned ID numbers [which are entered as non-notifiers] as well as regularly-assigned EPA ID numbers as non-notifiers. Idaho would not particularly object to the consolidation of the "E" and "S" source records, as long as the non-notifier flag field is retained.

NE Clearly, I am a strong proponent of this I-Source Implementor Record. In the past, with E-Source and S-Source Records that were converted from the former RCRIS system, in many cases these records did not

bear a date – therefore, during an unspecified timeframe changes were made in the former RCRIS system. Nebraska DEQ has agreed in the past to delete the E-Source and S-Source records from the database, and instead to enter all changes to generators' status through the N-Source with the date of documentation that is in the facility's file. The generator is the same company, irregardless of the fact that the State or Region inspects it. In the past, we have had conflicts in the generator status of company's and in numerous instances, the generator status of many of Nebraska's companies was erroneously changed, with no date maintained in the database with the E-Source and S-Source records. It was difficult to try to assess where the data came from. Now Nebraska prefers to use letters or the Notification (8700-12) form from companies to change their generator status if they are SQG or LQG; otherwise, for CESQG facilities, we use RCRA inspection generator status information. All of the generator status changes are now documented in the companies' files. For any non-responses due to returned mailing, deactivation letters or memos are documented in the facilities' files. Nebraska DEQ has spent, and continues to spend large amounts of time and resources by using notifications, letters, inspections and deactivation notices to cleanup the generator universe.

Region 10 We don't have a problem with the elimination of the 'E' and 'S' source record types, since those types were not used consistently by the R10 translators anyway; at this point, EPA and States share the IOR. We must have the ability to identify the "non-notifier" records though. We assume we will build an "I" record with the "non-notifier" flag set for Alaska. Another issue for us is whether non-notifiers get tracked in a consistent way, which isn't a database design issue; so we will address this via another forum.

DT Response: ***The Design Team is following the recommendation of the PAA Team and collapsing the 'E' and 'S' records into one 'I' Source record. There were several objections to this proposal, primarily two types:***

1) obscuring <u>which</u> agency did the evaluation that determined the status; and
2) weakening the ability to track non-notifiers.

The Design Team would like to provide the following background information that was considered when making our decision regarding this issue: The original purpose of EPA vs State views of the data was to allow the data to reflect different determinations about the activities of the handler. Until the Permitting Module redesign about 5 years ago, TSD unit information was contained in the Handler Module as well as in the Permitting Module. The Handler Module unit data was used in TSD universe calculations, specifically the SOURCE data. Therefore, the SOURCE 'E 'and 'S' data determined the crucial TSD universe. Following the Permitting Module redesign, however, TSD universes were determined solely based on Permitting Module data. Permitting unit data is fixed IOR (i.e., either the State or EPA has the responsibility to maintain data that determines TSD status).

The collapsing of SOURCE 'E' and 'S 'into SOURCE 'I' will have the effect of basing universes of non-TSDs on fixed IOR data, as TSD universes have been determined for years (since the Permitting Module redesign).

Part of the reason the PAA recommended 'I' rather than 'E' and 'S' was to reduce the entire Handler Module to fixed IOR. This simplifies programming for the Handler Module and simplifies training for new Users.

For those concerned that the data will no longer clearly reflect which Agency determined the current status of the handler, we suggest that the handler comment field can be used to explain who made the handler status determination. We also remind Users that an evaluation should be entered into the CM&E Module

corresponding to every SOURCE 'I' record and that CM&E record will store not only the Agency, but also the staff person's initials, etc.

We also note that some Users support the concept of the data reflecting disagreement between the State and EPA over the status of the handler. While this was, indeed, one of the original purposes of the SOURCE 'E' and 'S' concept, that purpose became less essential when it no longer applied to TSD universe determination. We believe that EPA and the States should resolve these differences outside of the database and rely on the Handler Module IOR to record that resolution in the database.

Finally, no change is currently proposed as a part of UID/WAM for non-notifiers, other than the requirement to use SOURCE 'I' rather than 'E' or 'S'. This issue was referred by the UID/WAM PAA Team to the WIN/Informed Guidance Team for resolution.

Comment 7 - Concern about "E" and "S" Sources in other Modules

ID Idaho has other concerns, however, regarding source consolidation that go beyond the Handler Module. In the CM&E, Permitting, and Corrective Action modules, data can currently be entered by either the region or the State and the "E" or "S" source_type identifies which events or activities are whose responsibility. Not only does this eliminate confusion about who can change the data; it provides a record of what the State is actually doing and what are EPA Oversight activities.

IL We believe it is important for either EPA or States to be able to enter data based on inspections, and for the data to be clearly identified as to whom did the inspection. It would also be helpful if information provided by Federal Contractors were clearly labeled as to source, so States can check and fix the data more readily, which has proven necessary in Illinois.

DT Response: ***Only the Handler Module source information would change according to the PAA Team's proposal. 'E'and 'S' will still be used in the other Modules.***

Comment 8 - 'E' and 'T' Notification Source Records

CO Colorado has a separate database to track spills and all temporary generators are required to get permanent RCRAInfo EPA ID numbers. Emergency Permit handlers, who have not notified, are currently tracked as non-notifiers using an S record. I would like more information on how the R, E and T sources will be used to calculate the generator and transporter universe.

IL We do not believe it is appropriate for Emergency and Temporary values to appear in the Source Type fields. Instead these values should be a part of the Generator Status fields. Emergency and Temporary generators should still complete Notifications of some sort, although many States allow telephone notifications for these situations. The generators would usually have to complete the Hazardous Waste Report as well, so both values are critical to understanding the RCRA Site.

KS Kansas tracks the temporary ID numbers by issuing a ID number starting "KSP xxx xxx xxx". We request that sites desiring to ship hazardous waste on a "one time" only basis contact us just prior to shipment. The temporary number is good for 30 days and expires after that period of time. No matter the generator status. After completion of the one-time shipment, verified by receipt of manifests, the generator status is changed to a non-generator. This deactivates the ID number. In nearly all cases, the generator sees this event as temporary. Few see it as an emergency. What is the difference between them, anyway? Duration or need? Both? Kansas does not need the emergency or temporary values.

NE Tracking Temporary ID#'s: This becomes a particularly important issue to track temporary ID#s in RCRAInfo when company's are episodic Large Quantity Generators during a Biennial Reporting year. If we can successfully tag them with the designation of a one-time, episodic large quantity generator in order to file the Biennial Report, that would be very useful. Likewise, we would want to reduce the generator status, upon receipt of the Biennial Report for the specified time frame.

Region 7 Iowa uses the "One Time Generator" status for our Provisional ID#s. We assign a IAPnnnnnnnnn number to all provisional numbers, except where the site has an existing number, and they are doing a one-time clean-up of the site by the current owner, generally prior to demolishing the building to use the site for some new purpose. We will probably switch to the new category "Temporary" to assign numbers for this purpose, but think that the label "One-Time Generator" should be attached to make sure it was a one-time event.

I don't see a need for an Emergency number. I think the Temporary number can be used for either purpose. I also don't feel that the "E" should be used for this, since it is currently used for an EPA inspection, and that data will remain in the system, even if the "I" code were used (which we object to).

DT Response: ***The Source Types will be*** **R=Hazardous Waste Report; B=Both Notification and HW Report; E=Emergency; and T=Temporary.** ***Use of the 'E' and 'T' sources is an issue that was referred by the UID/WAM PAA Team to the WIN/Informed Guidance Team for resolution. "Track all emergency and temporary sites nationally" is Recommendation #4 in the UID/WAM Final Report. The Design Team decided to add the 'E' and 'T' sources now in anticipation that they would be needed as triggers for relaxed data entry requirements, since all currently required information may not be available for these types of notifications.***

The Generator Regulatory Status field is being archived/removed, therefore emergency/temporary indicators can no longer be tracked there as some implementers are currently doing.

The Universe Calculations currently look for the most recent record. The new V2.0 Universe Calculation programs are still under discussion and will be distributed to the User Community for review/comment in May 2002.

Comment 9 - Dun & Bradstreet Number and the Number of Employees

CO How will the D&B number and Number of Employees fields be populated? D&B number is useful in enforcement actions, but not for all handlers.

ID Idaho does not understand why the Number_of_Employees field is being added, but does not have a problem with it being added.

IL The number of employees does not seem to Illinois to be a necessary component to environmental data. Dunn and Bradstreet number is potentially of use if current. However, neither of these appears on the revised notification form. What is the intention for obtaining the data? If matching based on addresses is contemplated, how will the proposed software handle multiple businesses that share one building, as frequently occurs in metropolitan areas - we have identified one building with at least 18 businesses in the Chicago area, so matching will require human review.

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

Page 7 of Design proposal says D& B number is being added to owner/operator, but it is not in crosswalk. It is in structure chart. Why do we now get D&B number? What is its data flow? If we have it, why do we need D&B-type fields like # employees?

DT Response: ***The decision to add these fields was made by the UID/WAM PAA Team. Note: they will not be populated during V2.0 data conversion.***

Comment 10 - Multiple Values per Field versus Yes/No indicators

CO The June 21, 2000, Background Document that was final 6/19/00 shows Transporter values for Commercial and Self. The Mode of Transportation is also shown. The new Site Identification Form only identifies Transporter as an Y/N field. Colorado would like to keep the Transporter values of C, S, X, and N as nationally defined and would like Commercial Transporter and Transporter for Self put back on the Site Identification Form.

DT Response: ***The Site ID Form collects only a Y/N indicator for Transporters. All other boxes were removed. This was a PAA Team decision. CO can use the new Hstate_Activity Table to track Transporter values such as Commercial and Self.***

Comment 11 - Universal Waste Handlers

ID Idaho supports the inclusion of Universal Waste information as a good thing, but is this going to become a calculable universe so that States and EPA can track just how many facilities are actually conducting universal waste activities? Along those lines, will the LQUWH designation be included as a generator status type just as the regular LQG, SQG, etc.?

DT Response: ***If the Site ID form submitted by the applicant has check boxes marked in the Universal Waste Activities section, it is implied that the site is a Large Quantity Handler of Universal Waste (LQHUW). A universe calculation will be added to RCRAInfo for these handlers.***

Comment 12 - Collecting/Reporting Generator Status

IL PAA Recommendation 6 of the February 28 System Change document -We strongly object to the decision "at a minimum, the required reporting frequency for the status is biennial." In previous documents this was not required and Illinois will be unable to meet this requirement with current rules, regulations, and budgets. Under what authority would EPA or the States ask every site with an identification number to update their status biennially?

KY What is the purpose of two different statuses for one facility? How will the universe calculation work? If a State is the IOR for the data then why have an EPA record? Currently, Kentucky has a problem with this now. In Kentucky Conditionally Exempt Generators are just that exempt and they are State regulated. But according to User support, they are RCRA regulated since we went to RCRAINFO. Therefore, if Kentucky runs a HQ report we have no CEG universe because we do not and will not enter them as RCRA regulated.

MO Missouri has a more stringent definition of Large and Small Quantity Generators than the federal regulations. Missouri does not have the staff to extrapolate Biennial Report data to determine the federal status of generators and enter that data to RCRAInfo. This additional work would require additional funding from EPA.

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)
Crosswalk shows federal generation data going into proposed State-generation fields.

DT Response: ***PAA Recommendation #6 is "Collect both State and Federal generator status from States". When the State receives a Site ID form from a Biennial Report or a Notification, the State will send/enter both a State and Federal generator status. If the State's definitions are the same as the Federal, the values of the two fields are identical. If they are different, it is up to the State to determine the Federal equivalent and provide it. For background information on the decision, refer to the PAA Final Report. The LU_Generator_Status2 Table will store both the Federal and the implementer-defined generator statuses.***

EPA is not requiring implementers to have <u>every</u> generator renotify biennially. Site Verification is voluntary, but should be expected of LQGs and TSDs at least biennially due to the federal biennial reporting requirement.

Comment 13 - Site Contact Address and Title Fields

IL Illinois believes that for many companies retaining a specific address and contact solely for the biennial report would save much time and confusion in submission of the reports, as often the report is completed by manifest or computer technical staff and then forwarded to a plant manager or other officer for signature.

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)
Contacts are the folks we mail to! How do we send acknowledgments and BR reports and other stuff? We can't assume the contact is at the mailing address (unless you set up the Site ID form to collect it that way). We can't mail to just the mailing addresses because some are huge installations that can't route mail that lacks an addressee. Contact title helps get the mail to the right person when the contact has left his job, especially if s/he has stayed within the company, but we can use a generic title ('Env Compliance Mgr').

I ask that the Design Team provide distinct fields for these elements on the RCRAInfo and CDX screens. The Design Team's proposed database structure already provides places to store this info once it is collected.

VT Site Contact Title - We use the title for mailing labels and we believe it helps the mailings reach the appropriate person even when the last known contact is no longer at that position. In our experience, site contacts change frequently and it is uncommon for handlers to re-notify every time the site contact changes, so using the contact title is a way of getting mailings to the responsible person.

DT Response: ***The content of the Site ID Form was based on UID/WAM PAA Team decisions, not the Design Team. The instructions for the 2001 Hazardous Waste Report state that if the site contact's address is different from the location, it can be recorded in the comment section of the Site ID Form. There will, however, be fields to enter this data in RCRAInfo. The contact address fields will be optional, but allowed on the RCRAInfo/CDX data entry screens for those States that require the data. The translator flat files will also accommodate these fields.***

Comment 14 - Tracking Multiple Contacts

KY Kentucky tracks all non-notifiers, which are Source S records. There is no source S for State inspection for a contact type. Also, there are different people at a facility that handle the Notification data, Part A data, and BRS data. States need the ability to track at least 3 different people at a facility. So there is a need for implement define contact types.

Region 1 and the States MA, RI, and VT
The Design Team's document says Contact should be N, A, R (not E, S, I). This is fine. The notion of 'E' and 'S' contacts comes from RCRIS data entry screens. RCRIS let us define types of contacts, but New England didn't use this capability.

DT Response: ***Multiple contacts can be tracked, one for each Source Type. But, Contact "type" will be archived/removed per the PAA Team's recommendations.***

Comment 15 - Legal vs DBA Names Reported on the Site ID Form

IL Regarding legal versus DBA names, Illinois believes both are important. This can be a significant difference when companies merge or divide, and can clarify the exact site involved in the data.

NE The proposed Site Identification form says that company name is the site's legal name. If the company is a corporation, the legal name, under current practices, is also verified through the State of Nebraska Secretary of State's offices. Nebraska DEQ strongly concurs that the legal name of the company should be collected on the Site Identification form. The legal name of the company should be accurately filed on all current applicable permits, manifests, reports and Notification forms that apply to the site. If the company is using a DBA name, that name is also acceptable, as long as the DBA name is correctly filed with the State of Nebraska Secretary of State's offices.

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)
The proposed Site Identification form says that company name is the site's legal name. We ask to have the form collect both legal and DBA names (when they differ) and that RCRAInfo store both names, each tagged as to its name type. History of both types of names should be kept, tagged as to type. CT and NH have written to us stating their concurrence with this proposal. Alternate names are fairly rare, but are a problem when they occur, so it'd be nice to also keep them in the database, but not collect them on the form.

If only one company name is collected, it must be DBA name. EPA's Facility data standard States that Facility Site Name is "The public or commercial name of a facility site (i.e., the full name that commonly appears on invoices, signs, or other business documents, or as assigned by the State when the name is ambiguous.)" Therefore, RCRA's Site Verification form must collect DBA name, and may collect legal or other names.

The current RCRA Notification form (and BR IC forms thru 1999) failed to specify the kind of company name (legal vs DBA) to be entered. When asked, EPA-NE has always told States and handlers that the name should be the DBA name so that inspectors could find the site and the public would recognize it (because it is on the company's sign and in the yellow pages). Three NE States have their own Notification forms: VT's says use the company name that will appear on manifests, MA's doesn't specify, NH's says 'Enter full legal name of facility as it will appear on the manifest for waste shipments from this site. If the company is doing business with another name (DBA) then enter this information on this line [i.e. both in a single field].' The Uniform manifest say use name reported to EPA on notification.

DT Response: ***2001 Hazardous Waste Report instructions were changed by the PAA Team to request DBA name instead of legal name after they reviewed the comments received from the User Community. Instructions are under development by OSW's Analysis and Information Branch for use of the Site ID Form for Notification and Part A purposes, but, should available before the end of May, 2002. Please contact Dave Levy (levy.dave@epa.gov) for more information.***

Comment 16 - Inactive Handlers/Handler IDs, Regulated under another EPA ID Number

IL Regarding owner changes, what is the intention when a completely different type of business opens at a location and is not expected ever to generate RCRA wastes. For example, a small plant closes and a convenience store opens at that location. Should RCRAInfo contain the store name and owner, although they were never a generator, or should the plant information remain in the system?

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)
RCRAInfo's previous ID element allows the current ID to point to a site's other, older ID (which could point to another, and it to another to chain together multiple IDs), but RCRAInfo offers no way to point in the other direction (from an older ID to a newer one). (RCRAInfo's secondary ID holds State or non-standard IDs and so is unavailable to hold 'newer ID'.)

We ask that RCRAInfo add an element 'newer ID' that points from older ID to a newer one. This is not a high priority item for us, but, as RCRA history lengthens and data are integrated and cleaned, now is the time to be capturing this essential information in usable form.

Region 7 Iowa uses the "Regulated under another ID" is numerous cases when we discover that there are more than one ID# for the same site. We (in cooperation with the customer) determine which ID# number to keep as the active one, then change the other one (or more) to N A 10 (not regulated, covered under another ID#). We have a policy of never deleting an ID from the system. We also use the secondary ID# field to cross-reference the two ID#s, so that if you bring up the duplicate ID, it will tell you what the active (current one) is. In addition, we also put "Duplicate ID #" in the Handler Name field, after the company name, as a red flag that this ID is not the active one.

DT Response: ***The WIN/INFORMED TSD Universe Group (TUG) defined the "active" handler universe and this universe will be implemented in V2.0. The Design Team recognizes a need for establishment of definitions on how "inactive" handlers should be defined and flagged, but this is outside the scope of the V2.0 design work and will be examined by WIN/INFORMED Permitting and Corrective Action (PCA) PAA that will begin in early 2003. RCRAInfo can then incorporate that logic into the Universe Calculations for reporting.***

The HPrevious _ID Table was created to store ID history.

EPA Identification number assignment is an issue that was referred by the UID/WAM PAA Team to the WIN/Informed Guidance Team for resolution. The Guidance Team is currently working on UID/WAM PAA Team Recommendation #1, "Issue Guidance on EPA Identification number assignment", which includes how and when an ID should be assigned.

Comment 17 - Tracking Multiple HHandler records for the Same EPA ID

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

The proposed HHandler table holds all Handler module elements that don't repeat on a given Notification (except for hbasic and huniversal_waste): it may be as flat as is reasonable. Perhaps the Design Team could consider adding an element to hhandler to track which instance of hhandler for a given ID and activity_location is the latest instance. If an index were built on this latest_instance element, selecting and reporting might be more efficient. Possibly other tweaks to the underlying structure might serve to make it sufficiently efficient that a reporting structure would not be needed.

DT Response: ***The combination of sequence_number and receive_date now make it clear which record is the latest. The latest record will be present for each activity location in the Handler Reporting Table (Hreport_Univ).***

Comment 18 - Retaining SIC Codes

IL We believe SIC codes should be retained at least until such time as all active TSDFs and LQGs have been converted and verified by the companies. Since there is not a one-to-one conversion between the two codes it would be better to retain older data than to loose the data altogether. Illinois is presently collecting NAICS Codes for new notifiers but maintained the SIC codes for all previous notifiers, as conversions could not be done with sufficient accuracy.

DT Response: ***The Environmental Data Registry standard requires the NAICS codes. The SIC code data will be archived/removed, but still will be available for reporting. Although many SIC codes do not match one-to-one NAICS codes, the Design Team feels it is better to convert SIC codes to NAICS codes, however imperfect such a conversion may be, than not to convert. The Design Team has developed a SIC-to-NAICS table that will be used to convert existing SIC codes to NAICS codes. For additional information regarding the conversion of SIC codes to NAICS codes, please refer to the RCRAInfo V2 Conversion Rules paper.***

Comment 19 - Tracking Exports

IL Although we agree integrating export data is a valid opportunity for burden reduction, until such time as OECA's data is actually merged into RCRAInfo, the Biennial Report data must be collected and maintained by all States and by EPA. If this is not done, year-to-year comparisons of data will be impossible. In addition, some large quantity generators export all of their RCRA waste so they will not even be completing a Biennial Report, as these changes are now structured, so will appear as non-generators in the data system.

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

We wish to know more about the suitability and quality of the OECA HWES data on RCRA exports that the Design Team proposes use in RCRAInfo instead of collecting export data on the BR report. We also wish to know more about the schedule for loading it into RCRAInfo.

DT Response: ***This is a PAA Team issue, not a Design Team decision. The schedule for integration will be sometime after January 2003. Implementers that use their own forms can collect export data if they wish and store it in their own systems.***

Comment 20 - Tracking Imports

IL We believe the data element for country of origin should be added at this time. States who are able to determine this information could provide it, which would improve the data quality, but States would not be required to provide it until the ICR is renewed. We do not understand exactly what is anticipated with the revisions of the data, but based on Statements made during the conference call June 19 we are concerned both with quality of data and determining generator of record. Until more information is provided, we cannot comment on data improvements in this area although point of entry does not seem a valid way to segregate the information. A given "foreign" site could potentially use many points of entry, so apparently they would be given different number for each point. How would these numbers be tied together or tracked for purposes of obtaining annual reports from the importer? How would the TSDFs be able to report these, since their contracts would be with the foreign generator or the importer, but not related to points of entry?

DT Response: ***The decision to track imports in this manner was made by the PAA Team, not the Design Team. It was proposed that Country of Origin be added to the customer identification information on the WR form for the 2003 BR cycle. There is no change in WR reporting for the 2001 BR cycle.***

Comment 21 - Converting BR and Notification Data into the New Handler Table/Site Verification

KS Kansas favors the over-writing of BR data by Notification data simply because there has to be a primary document. This a change in an earlier position Kansas took on this issue. There is no clear winner in the debate as to which field from which source document should take precedence over a similar field in another source document. Field-by-field, arguments can be made and go either way. Choose a primary document and keep it! The Site Verification Form can supplement both the Site Identification Form and the Notification by "flagging" sites that need to update their Notification. For the Site ID Form to be effective, abandon the biennial cycle and, as a minimum, annual mailings and inspector on-site verifications should be utilized.

NV In regard to data cleanup and verification, EPA needs to provide additional grant funds to support these activities if States like Nevada are going to undertake them.

DT Response: ***The PAA Team's Data Integration Survey requested that implementers select how they would like handler data converted into the proposed new structure in which history was only to be kept for specific fields. Because the Design Team chose to use a different history concept, that of each submission existing as a separate record with all data retained, there will be no over-writing of BR data by Notification data. Each historical IC Form will be converted as a "R" Source Type Site ID form. They will co-exist with the current Notification record as well as future Site ID Form documents.***

As for Site Verification, the EPA encourages, but will not require, implementers to conduct Site Verification. The implementer can do this as their resources allow.

Comment 22 - Latitude/Longitude Data

KY Where is this on the form?

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

EPA data standard for lat/long is that latitude must be 10 alpha characters and longitude must be 11 (for precision). Also, of the forms, only Part A has lat/long, and it is rare. The usual data flow for lat/longs is from GIS sources (State, EPA, contract). We have lat/longs for most handlers, and they should be in RCRAInfo (for EPA's site integration systems like FLA and for future map presentations). Make RCRAInfo data structure allow for a) multiple lat/longs, that b) have an "I" source, and do not repeat with HHandler. Put them in a table by themselves (like waste codes) and allow them to have no parent hhandler record. No history of such 'I' lat/longs is needed.

DT Response: ***Latitude/Longitude data is not collected on the Site ID Form. The Design Team has verified and made the necessary changes to the field lengths . Lat/long data could be populated via EPA's Federal Registry System (FRS) or Implementer data (system or inspection data).***

Comment 23 - Country of Origin for Addresses

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

Country in all addresses: Owner/operator and contact addresses need to be complete for mailing and for locating/identifying individuals.

Region 6 Region 6 strongly supports the addition of a Mail_Country field to the Mail Address information. However, a Contact_Country and a Owner_Operator_Country should also be included.

Region 7 We think the new field Mail_Country should be expanded to include the Mail address and the Contact Address (as well as the Owner/Operator address, if it is kept).

Region 9 The COUNTRY field should be added to all addresses.

DT Response: ***As a result of User Community comments, the Design Team decided that for consistency, a Country field should be added for all addresses except for the location, which should always be within the U.S.***

Comment 24 - Separating Street Number from Street Name on Site ID Form

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

Separate street number from street name on the proposed Site Identification form, so we can tell appt G at 10 Washington Street from number 10 on G Washington Street (both 10 G Washington Street) and Rte 11 Bypass from number 11 on a road called bypass (11 Bypass). Parsing out street number would be unreliable when automatically loading/updating RCRAInfo or State systems.

DT Response: ***This is a UID/WAM PAA Team decision, not the Design Team. Note: this change was not implemented on the new Site ID Form.***

Comment 25 - Universe Calculations and HUniverse_View

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

Page 13 of the Design proposal discusses a reporting structure (v_universe) for huniverse. Since Huniverse is calculated, why have both it and v_universe? Why not have just the one that is efficient for searching and reporting?

About 20% of the time, we search for handlers not in a universe. The data structure should be efficient for that. (Perhaps the h/v_universe table should have a row for every handler so we won't have to MINUS handlers in huniverse from all others to get those who aren't in a universe). It is critical to have Huniverse current. The chosen h_universe or v_universe structure should support real-time updating of it when its underlying tables are updated.

Region 2 It is extremely important to have real-time updating of universe calculations in Huniverse. Region 2 often speaks with notifiers almost as soon as they are entered into the system - any lag time is a burden on staff help deal with the regulated community.

Also, currently HUNIVERSE_VIEW, though supposedly "optimized" is still "slow". Work done on this table or other proposed universe tables must be created with speed and functionality in mind. Region II currently uses an ad hoc SQL routine that converts the HUNIVERSE table's Huniverseuniverse_type field into the flat structure as in HUNIVERSE_VIEW when ad hoc reporting. It was tested repeatedly that when all common universe fields are pulled, LQG, SQG, CESQG, Transporter, 7 TSD Management Tracks, and 4 TSD type fields - this ad hoc routine yields faster results, in some case 50% faster than a direct pull of off the HUNVERSE_VIEW - the bigger the State,.the more the time difference. Region II presumes that HUNVERSE_VIEW is simply a SQL run-time generated table that best be avoided when possible.

Even though HUNIVERSE_VIEW holds all Handler identification numbers, it still needs a specific field indicating "NO UNIV" - this will not only help identify non-universe ids when needed, but will allow a simple WHERE condition to pull data for only the ids where the retrieval is necessary to improve performance. Until this matter is resolved Region II will continue to utilize it's ad hoc routine off of HUNIVERSE, so we request nothing be touched in that table.

Region 10 Since there will be a need to change how the current universes are calculated, this seems like a good time to add that universe that everyone clamors for: "an active TSD" universe. There are folks who have developed reports around the country to depict these, possibly using slightly different criteria. If we can't do this on a national level we will need to do it at the Regional/State level. With much of the data becoming very public we will need to get in sync with the States if we can on numbers of TSDs. The subject to CEI universe encompasses too many inactive facilities to be very useful to the public and even to generators. If we can't do this during this design effort, when would be the next chance to do such a thing?

DT Response: ***Please refer to the Design Team's explanation in the newly released paper: "RCRAInfo V2.0 Handler Reporting Table: Hreport_Univ"***
(http://www.epa.gov/oswfiles/rcrainfo/version2.htm

The WIN/INFORMED TSD Universe Group (TUG) defined the "active" handler universe and this universe (Operating TSDF) will be implemented in V2.0. The Design Team recognizes a need for establishment of definitions on how "inactive" handlers should be defined and flagged, but this is outside the scope of the V2.0 design work and will be examined by WIN/INFORMED Permitting and Corrective Action (PCA) PAA that will begin in early 2003. RCRAInfo can then incorporate that logic into the Universe Calculations for reporting.

Comment 26 - Out-of-State Transporters and the Handler Module

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

Users and report-developers are confused in subtle (and not-so-subtle) ways by the fact that Handler module data are optional for out-of-State transporters. Careful design of reporting systems (to guide the User away from selections on missing data and to ensure handlers with missing data are selected and reported appropriately), documentation (transporter universes are out-of-date and incomplete and should not be used), and end-User training (search for out-of-State transporters in their home State) will help.

We ask that HQ clarify when Implementors set the Transporter flag in a given activity_location. Do they do so only when the Handler notified in the location? Or when the handler is licensed in the location (and, if so, is the licensed to originate in the State or just to pass thru)? We believe most Transporter flags mean that handler notified long ago as a Transporter, and tells nothing about the real world now.

DT Response: ***Whether an Implementer enters handler data for an out-of-state transporter with their own activity location is up to that Agency. There are States that license and collect fees from out-of-state transporters and these States may conclude that entering handler data for all out-of-state transporters is the best way to track those transporters. The existing feature offers the users flexibility in deciding if and how to track out-of-state transporters. We would defer to to the WIN/Informed Guidance Team to decide if there is a need for a national standard on tracking out-of-state transporters. Regarding the need to tell the current "real world" status of out-of-state transporters (or any handler) , we remind the User Community that Source 'I' should be used for that purpose.***

Comment 27 - Null versus Zero Dates

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

We strongly prefer null dates to zero ones. It is all too easy to get a wrong search or compare when zero dates look like 01/01/0001. We also prefer null alpha fields to ones with a single blank.

DT Response: ***We agree that nulls are correct in this situation. The RCRAInfo Development Team is working to correct this problem throughout RCRAInfo.***

Comment 28 - Entry of Blanks or NA as Acceptable Values

NE Form Values on SI Form: Nebraska deals on a large scale with SQGs and CESQGs, and for this purpose, I'd like to see an acceptable value as "blank" or "NA" be added to acceptable values; especially valuable would be operator, which will be quite confusing to the smaller companies.

DT Response: ***Data elements defined as nationally required are mandatory. If the handler doesn't provide mandatory data, the implementer will have to contact them to get the information. The RCRAInfo data entry screens will have screen edits to enforce the designation of mandatory.***

Comment 29 - Conversion of Historical Name Data

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)
Also on the 6/26 call, the UID Design Team agreed to let Implementors add historical files of names to RCRAInfo's Previous_name table. We would get a 1-time opportunity to do this, probably around the time of conversion. The Previous_name table will be archived/removed when UID is implemented, but RCRARep/etc can continue to search and report from it.

Region 10 Please allow us to do the one-time conversion of the historical site names into RCRAInfo. We have about 15-20 years of data we want to keep in an Approach database. We have no issue with the concept of creating a new site ID form with every change; we just want to be able to have the historical site name info available for our lawyers and CERCLA folks who use it often.

DT Response: ***The Design Team agreed to do a one-time conversion of historical site name data for implementers around the time of final V2.0 data conversion (June 2002).***

Comment 30 - Conversion Testing

KY Kentucky would like to see how the conversion of our data is going to work before it happens. Kentucky's data did not convert like we requested from RCRIS to RCRAINFO and it took several months to get it straightened out and our address data never was corrected.

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)
We ask to review the conversion design as soon as possible, even preliminary drafts. We understand that conversion design may be done around 8/1/01. We do not see how elements in current tables can be matched together to produce the proposed HHandler table because some of the current tables repeat and need not have common values in the fields on which we assume the matches will be made.

DT Response: ***The Design Team developed a RCRAInfo V2.0 Conversion Rules paper, which will be released in May 2002.***

Comment 31 - Issuing Blocks of ID Numbers

ID Although the issue of generating a block of ID numbers is not a part of these particular design changes, since it was mentioned during the June 26, 2001, conference call, Idaho would like to cast its vote in favor of incorporating this feature into RCRAInfo.

NH The New Hampshire Department of Environmental Services needs the ability to generate a block of EPA IDs. We use our State system to issue EPA ID numbers; after the number is issued the data gets entered into RCRA Info. We currently have a list of NHD numbers that we are using, but we will need to pull another block of numbers when these run out.

Region 10 Please add the functionality to be able to generate a block of ID numbers in advance. Region 10 (for Alaska) and several of our States use these blocks of ID numbers to give to the Drug Enforcement Agency (DEA). DEA "busts" are a "need-to-know" activity, precluding our ability to get the information in advance. Block ID numbers also help us when the system goes down and we need to assign an emergency ID number; or when the data staff are all out and a manager or colleague (with no "edit" rights in RCRAInfo) has to assign an ID number for us.

DT Response: ***This functionality is currently available in RCRAInfo using the "Batch EPA ID Generation" link on the System Administration menu.***

Comment 32 - Changes to RCRAInfo for use in Conducting a Site Verification Program

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

Please add RCRAInfo elements to track date Agency last sent handler a request for verification of Site Info, why it was requested (BRS, inspection, verification mailing), what the response was (dead mail, no response & response was optional, no response & response was required (ie, no change required a response), response w/no changes, response w/changes), and when the response was received. Prominently display this info on EPA and State Web pages to 'encourage' malingerers to be forthcoming and promptly in responding to site verification requests. The UID/WAM PAA determined that Verification of Site data is needed. We agree. Give us the tools to do this work, to track where follow up is needed, to track and publish our success and highlight where more compliance (or regulations) are needed.

DT Response: ***This is out of scope for the V2.0 Design, but could be discussed by the WIN/Informed Handler Monitoring and Assistance PAA Team in the near future if there is a shared need amongst implementers to track this information.***

Comment 32 - Handler Reporting Table

GA Why limit reports to handler's State when the system was designed specifically to allow access to all States' data? However, we would suggest a data cleanup effort to remove hhandler records created in RCRIS by another State to enter data against a facility (i.e., records created by Kentucky for Georgia facilities). This has caused much trouble in reports generation and data review.

IL We are concerned with the Statement on page 14 that reports will be limited to the handler's State. While we agree that data updates and corrections must be limited to the handler State, we do not agree that States should not be able to access data. With the number of waste shipments between companies in all States, and transporters operating in many States, being able to view all the data that resides in RCRAInfo is important to verify data provided.

NE Other States often have the need that arises to view other States reports. With the number of hazardous waste that is shipped between companies in other States, and hazardous waste transporters out-of-State as well, it is important to have the ability to view all of the data that resides in RCRAInfo, to verify the data is accurate.

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

The Design Team's reporting structure or the underlying tables must make searching on previous name, secondary ID, previous ID, 'newer ID', location address fields, and State district as efficient as possible. Searching on their history should also be efficient. 99% of our data are added/updated once, searched many times a day, and reported often. The proposed hhandler will have very many records. Attention is needed to ensure searching is efficient. Reporting structure must include out-of-State handlers because most reports must be able to include them and most searches (eg, name/id/town) must include them.

Region 6 Region 6 <u>strongly agrees</u> with the development of a Handler/Waste Activity Reporting view or table. We have maintained from the beginning concept of RCRAInfo that "Being User Friendly" should not be limited to the Data Entry functions. Simplifying the extraction of data, both quickly and accurately must be a priority.

DT Response: ***The Design Team changed our position as a result of User comments. The Handler Reporting Table (Hreport_Univ) will contain all activity locations for each Handler ID.***

Comment 33 - Certain Activity Data not Required on Site ID Form when submitting for Biennial Reporting

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)

Instructions for filling out the BR form should say that no fields on the Site Identification are optional. Currently the instructions says that Site Land Type, Used Oil Activities, Universal Waste Activities, Legal Owner and Operator of the Site, Waste Codes for Federally Regulated Hazardous Wastes, Waste Codes for State Regulated Hazardous Wastes are all optional on the Site ID Form when filing it as part of a BRS submittal. *It is unclear whether Transporter, exempt BIF and UIC are optional.* Furthermore, the form was not designed to distinguish between optional and unreported values and so Implementors cannot tell whether missing values in these fields indicate that the handler omitted optional data or reported no activity, owner, waste code, etc. Problems that this causes include:

- Because Site Land Type and Used Oil Activities are part of the proposed HHandler table, when we key BR data into RCRAInfo and these data are lacking, we will be forced to either copy forward prior info for these fields or leave them blank. Both approaches can introduce errors, confusion, and mistrust in our data.

- When looking for the latest generation activity, we can use BR data, but when looking at other activities (Used Oil, Universal Waste, Transporter, exempt BIF, UIC) we must avoid using BR data, even if it is the latest, because we cannot tell whether blanks mean the handler didn't report or reported no activity. When we use BR for generation and earlier, non-BR data for non-generation, we will have to report that activity data were drawn from different times and sources - which makes reports more complex.

- RCRAInfo requires current info to meet User needs. BR provides the opportunity to get good, current data for LQGs and TSDs, but making some fields optional wastes that opportunity. When Implementors do the work to process BR, we should aim to achieve complete, correct, current data in which Users can be confident.

DT Response: ***The Site ID Form instructions were revised (before printed and distributed) to indicate that if the site is submitting a Site ID for any purpose other than BR (e.g., re-Notification), they must complete all fields on the form.***

Comment 34 - 2001 BR Form Changes

KY The only comment Kentucky can make on BRS form changes is that we can not change the form or data we currently collect until they have been adopted into regulation by the legislature. Kentucky will have to continue to use the old form until the new one has been adopted into regulation.

DT Response: ***There were no federal BR regulatory changes for the 2001 cycle. Use of the federal Site ID Form is also not mandatory, so States can continue to use their own forms , provided that all required data is provided to EPA via RCRAInfo.***

Comment 35 - Loss of Biennial Report Postcard

MO There is currently a postcard used on the Biennial Report booklets for generators to report if they are temporarily or permanently exempt from the reporting requirement. If this is dropped and replaced by a 3 page Notification form, some may simply fail to respond.

DT Response: ***Implementers can specify how they'd like sites to respond when the BR requirement is not applicable. For example, the site can send in the Site ID Form and indicate***

their situation in the comments, or the site can send a letter stating they are not required to file. Technically, Postcards were never required by federal regulation.

Comment 36 - RCRAInfo/CDX Site Identification Project

MO — If States are expected to process these forms through the National Exchange Network and Central Data Exchange, is there any equipment required for the States? How much additional Information System support at the State level will required for this? These additional requirements would require additional funding from EPA. Provisions must be made for handlers that cannot or will not submit this form electronically. The specifics of the data entry validation edits will be very important to insure completeness and correctness by the submittors. What is the current status of the CDX portion of the project?

Region 1 (with concurrence from the following Region 1 States: MA, NH, RI, and VT)
On the Design Team's 6/18/01 call with Implementors, Dina Villari said that any State can have the CDX exclude its handlers. Dina said no details about redirects to State websites have been addressed. On behalf of New Hampshire, EPA-NE asks that the CDX redirect a handler to his State's Web-site, if the State requests this. The State web-site can have its own CDX (or simply have instructions how to file on paper).

Region 2 — The User should be notified PRIOR TO any data entry that he/she must print, sign and mail the confirmation page to the Agency in addition to filling out the online Site Notification [RCRA Registration] Form. This will avoid any confusion on the part of the RCRA Handler and ensure the User has current printing capability before entering data. A separate screen/page asking "Are you currently able to print from your web browser?" should also be included. The confirmation page should include the appropriate regulating agency's address.

Region 10 — Will CDX allow us to agree/reject each change on the form or only the whole thing. We are worried that we will end up with all those site "nicknames" again.

VT — Vermont has a program that is both more stringent and broader in scope than the federal program and as a result, uses its own Notification form. Our understanding of the proposed plans for the CDX is that Vermont handlers would not be able to notify online because our form is different from the federal form. We do not currently have the resources to support electronic filing of our the Vermont Notification and the Site ID form as it stands now does not collect all the information that we need, so electronic notification will not be an option for Vermont handlers in the short term.

DT Response: ***CDX is voluntary and will begin with a small set of pilot implementers. The data submitted by the regulated community will be stored in a staging area in RCRAInfo. The implementer will access it there and choose to accept it in whole or reject it totally. If rejected, the submitter will be notified and they will make the appropriate fixes and resubmit. No partial forms will be accepted. Once the submission is accepted, a confirmation page will be generated that the submitter can print and mail. If the State wants to redirect notifiers to their own Web page, US EPA can provide that option if the State supplies the Web address. EPA is currently exploring the possibility of supporting the submission of state-specific versions of the Site ID Form thru the CDX portal. Ron Gambill will present a RCRAInfo/CDX session at the June 2002 National Users Conference.***

Comment 37 - Translation Concerns

OR

It is critical that translators receive BR flat file specifications as soon as possible. BRS translators must modify their flat file generation procedures before submitting the 2001 Biennial Report data to EPA. This can be a time consuming activity, and may cause translators to fall behind the Biennial Report Implementation Schedule. EPA has committed to delivering final BR flat file specifications to the States by July 2001. Any slippage in meeting this commitment should be followed by an adjustment to the Biennial Report Implementation Schedule.

Handler Module flat file changes need to be sent to translators as soon as they are available. Any schedule changes must be communicated to translators immediately. Most translators have just completed updating their flat file generation procedures from RCRIS specifications to RCRAInfo specifications, and now face the need for another modification in a year to six months. Making these changes is resource intensive and time consuming. The more lead time we are given, the easier it is to plan for modifications. Not getting the information needed to make changes on time puts translators at risk of not being able to update RCRAInfo.

Any procedure developed by EPA for converting SIC codes to NAICS codes should be shared with translators as soon it is available. For translator States to provide NAICS codes to EPA, they must make the conversion with their own data structure, or incorporate the conversion into their flat file generation procedures. Good communication about schedules will help translators plan for implementing the conversions. A plan should be developed for ensuring information continues to be transmitted during a transition phase. We suggest keeping the SIC code field, in addition to the new NAICS code, for a period of time to allow for transition.

Region 10

It is likely to be a hardship or at least an irritation to translator States that they will finally just get a translation up for RCRAInfo1 and will have to redesign the translation for RCRAInfo 2. I would hope EPA could at some point have enough resources to make sure we have translator guidance/software in place very soon after a new version appears.

DT Response:

The HQ RCRAInfo Team distributed the FINAL 2001 BR File Specifications Guide on Aug 16, 2001. The RCRAInfo V2.0 Translator specifications will be released as soon as the V2.0 structure is considered final. Translators will have to provide NAICS codes, not SIC codes. If they provide SIC codes, those records will be rejected as errors because those codes are not contained in the LU_NAICS table. Translators may choose not to convert existing SIC code data into NAICS, or they can convert, using either their own conversion logic or the Design Team's conversion table. Please refer to the RCRAInfo V2 Conversion Rules paper for more information.

Comment 38 - New Site ID Form Imposes an Additional Burden on States to Process

MO

Requiring this new form to be submitted with each Biennial Report will result in States having to enter all of the data from those forms or reviewing them to determine which have changes. A majority of the forms submitted may have no changes from existing data. This is an additional burden for the States which would require additional funding from EPA.

DT Response:

The Site ID Form replaces the current IC Form for BR purposes and you will handle it similar to how you reconciled those in the past.

Comment 39- UID/WAM Program Area Analysis Details

CO The WAM/UID draft and final report was misleading and vague in regards to existing data fields and their values that are being archived or deleted,s which the User Community needed in reviewing this document. The February 28, 2001 RCRAInfo System Changes are significant enough that a hurried one week User review through the Design Team process is hardly adequate. I have every confidence that the Design Team will make appropriate changes based on discussions with an informed User Community.

Region 6 Region 6 does not recall receiving the "UID/WAA: ICR Reliant Changes, Program System Analysis, RCRAInfo System Changes" dated February 28, 2001, prior to its posting on the RCRAInfo Design Team Updates Web site as of 6/18/2001. Although previous documents received discuss "National" and "Shared" data fields, no specific discussion of "Organization Specific" data, nor deletion of specific fields from RCRAInfo, can be found prior to this document.

Reflecting back over my years at EPA, I believe that this UID/WAM Design Team is consistent with similar Teams in the past when forms changes were initiated. Form Revisions are first sent to OPM, then distributed to Regions &
States for review and comment. Ensuring that any comments are irrelevant and no changes or corrections can be made.

DT Response: ***The Design Team feels this process has shown that the User Community must be provided with more detail regarding the system changes that would result from the PAA Team's recommendations <u>prior to</u> receiving the Design Team's "Proposed Design Changes" document. The UID/WAM PAA Team provided that information to the Design Team in a document titled "RCRAInfo System Changes" . The Design Team recommended to the WIN Coordinating Committee that all future PAA Teams include this information when distributing the PAA Team's recommendations to the User Community for review and comments.***

Comment 40 - Future PAA Team Composition

Region 10 It would seem from the changes that the design team may have had to make to what was recommended in the PAA, that it would be helpful for a design team type member to be included on any future PAA teams to discuss with program type folks what form their needs could/can take in the actual design phase or at least the implications that certain changes would have. The PAA recommendations need to be written including such implications or the reviewers/implementers won't necessarily have enough information to be able to agree/disagree with the recommendations in a realistic way.

DT Response: ***Michael Hillard was on the UID/WAM PAA Team and did provide guidance to the Team regarding design implications. As a result of the extensive feedback the Design Team received from the User Community on the proposed design for V2.0, the Design Team recommended to the WIN/Informed Coordinating Committee that all future PAA Reports include a section that addresses the implications on RCRAInfo.***

Comment 41 - Why a Structural Redesign for V2.0 ?

Region 2 Since the follow-up Redesign conference call on 06/26/01, Region II understands that this redesign was an anticipated and on-going effort, anticipated by HQ via the WIN initiative and on-going by OSW's IMB. Region II can not wholly agree with some of the design changes - the main reason being no detailed "reasoning" for these changes have been documented - aside from the general comment that particular fields are being dropped due to a lack of a National consensus definition of "shared" data

fields. Nor has any analysis/comments been provided in terms of reporting ease and efficiency (on the assumption one may want to use the live database to report off in place off, or to augment the new proposed Reporting Database). The mechanics of how activity locations, multiple source records, data histories will be handled are still undefined, e.g. if incomplete site records are entered into RCRAInfo will the system simply use the old values from the previous sequence number. It seems from this data call many Regions/States share the same uneasy feelings Region II has from a technical and programmatic point of view.

It is still unclear how and if the addition of BRS data into the system is forcing the issue of the database being de-normalized. Certainly in certain cases, such as Latitude/Longitude which currently holds one set of information per Identification number, de-normalizing (merging into the main Handler table is beneficial), and perhaps can increase the speed of reporting, due to the fewer joins needed. However, it is not proven or clear that de-normalizing the rest of the Handler level data is beneficial.

Without further details on how all this will be handled without any loss of data or increased complexity to pull the same data, Region II finds collapsing all these seven files into one file as being unacceptable.

DT Response: ***The UID/WAM PAA Team's task was to determine what the National and Shared information needs are for the RCRA Program. RCRAInfo's original Design Team would have liked to redesign the Handler Module in the first place, but the scope of that project was to move the existing data from one platform into another, not redesigning the structure.*** *As noted earlier, one major driving force for the Version 2.0 structure is the need, mandated by the PAA, to track history for all data for every source record. There was no decision made by the Design Team to "denormalize" the structure of base tables for reporting convenience. We believe that all structure changes for Version 2.0 are thoroughly explained and justified based on the need to implement the recommendations of the PAA and by sound design. The exception is the* ***Handler Reporting Table (HReport_Univ)****, which will be "denormalized" for reporting convenience.*

Comment 42 - Using Crystal Reports as an alternative to Oracle Reports

Region 2 Region II has developed a number of Handler, Permitting, Corrective Action and CM&E reports on the Crystal Reports Platform. To date, Oracle Reports appears to be difficult to work with and provide sub-optimal reporting capability. Region II asks that OSW IMB investigate the cost of co-implementing Crystal Reports on the RCRAInfo server in RTP and report back to the RCRAInfo Implementer Community. If the cost of implementation is under $200,000 on-time it would be well worth adding the Crystal Reports option to RCRAInfo since it would alleviate the need for States and other Users to deal with Secure Remote and Oracle SQL*net+.

DT Response: ***This is not a Design Team or HQ/IMB decision. HQ/IMB has discussed this issue with Region 2 and Region 2 is working w/ EPA/NTSD to see if they will support Crystal Reports in the future.***