# RCRA DATA MANAGEMENT AGREEMENT (DRAFT)

Letter of Agreement between
Alaska Department of Environmental Conservation
Environmental Health Division
Hazardous Waste Program
And
US EPS Region 10
Land Chemicals and Redevelopment Division

This document defines the terms and responsibilities for managing data for both the US EPA Region 10 (EPA Region 10) and the Alaska Department of Environmental Conservation, Environmental Health Division, Hazardous Waste Program under the Resource Conservation and Recovery Act (RCRA) Hazardous Waste Program. The referenced data resides in the RCRA Information System (RCRAInfo).

RCRAInfo is an automated information management system for the storage tracking and analysis of data relating to state and federal hazardous waste program activities. EPA Region 10 and the Hazardous Waste Program equally share access to RCRAInfo with assigned users who can create, access, and modify data.

The exception to this document will be activities in Indian country and Denali National Park and Preserve, which is exclusively under the authority of EPA.

The intent of this document is to:

- Serves as the official agreement between EPA Region 10 and the department by identifying the areas of information management associated with maintaining RCRAInfo data;
- Clarifies RCRAInfo data management requirements and procedures;
- Improves partnering, information sharing, and the quality of RCRAInfo data;
- Provides a formal procedure for resolving disputes regarding the content of the data.

**General Agreements:**
1. EPA Region 10 and the Hazardous Waste Program agree to share all data within the RCRAInfo handler, e-manifest, compliance/monitoring/enforcement (CM&E), permitting, corrective action, financial assurance, biennial report, and PCB modules.
2. Data will be entered by the agency collecting the data within the time frames specified for each module.
3. The data that must be entered by EPA Region 10 and the Hazardous Waste Program is the system-required or "nationally-defined" data as defined by the most current version of the RCRAInfo Data Element Dictionary (DED).

**Department Personnel:** The Hazardous Waste Program will appoint one individual to be the primary data specialist for RCRAInfo management with Administrator permissions. This person will serve as the technical contact and data coordinator for RCRAInfo and is responsible for communicating with EPA Region 10 regarding data management, analysis, and reporting. Other Hazardous Waste Program users will have add/update permissions and be trained in reviewing and correcting RCRAInfo data and will be responsible for entering accurate data in a timely manner.

**Region 10 Personnel:** EPA Region 10 will assist the Hazardous Waste Program to ensure that data is properly managed in RCRAInfo. EPA Region 10 will provide data oversight, including development of policies related to national issues. All policies will aim to provide consistency and equity for Region 10 states.

**Communication:** The Hazardous Waste Program RCRAInfo data specialist and the EPA Region 10 RCRAInfo Systems Administrator (RSA) will work together to address data issues and upcoming data needs. The RSA will assist and support both Region 10 and the Hazardous Waste Program when problem solving and interpreting RCRAInfo requirements. The Hazardous Waste Program data specialist will be responsible to communicate needs and changes to the Hazardous Waste Program Team.

**Nomenclature:** Hazardous Waste Program naming process will be consistent with EPA's standard nomenclature policies and EPA Region 10 Federal Facility Nomenclature Standard. This will ensure that the data drawn from national systems reflects reporting needs and consistently populates other public databases.

**RCRA ID:** The Hazardous Waste Program data specialist will be responsible for reviewing, confirming, and approving initial site notification data and assigning a RCRA handler identification number (RCRA ID) within 10 days of receiving a new RCRA Site Identification Form (8700-12). The data specialist will also enter handler data and issue non-notifier RCRA IDs for sites that are discovered but have failed to notify the department or EPA.

**Data Entry/Review:** All Hazardous Waste Program staff will establish a User ID with access to enter, review, and edit data in RCRAInfo. Changes to database information will be reported to the data specialist within one working day, and significant changes to data and new sites will be reported to the Hazardous Waste Program Manager at least weekly by the data specialist.

**Data Quality:** The Hazardous Waste Program data specialist will create reports or use existing reports to run, on a scheduled basis, to review data entered by handlers and others to identify data quality errors and direct their correction. Data quality errors noted by EPA Region 10 will be submitted to the Hazardous Waste Program data specialist for confirmation or correction. By the tenth of each month, the data specialist will prepare a report to the Hazardous Waste Program Manager detailing significant data quality issues and resolutions for the previous month.

**Documentation:** The Hazardous Waste Program will maintain electronic files of all information for each handler issued a RCRA ID in accordance with the state's record retention requirements.

**Modules:**
1. Biennial/Annual Report – The Hazardous Waste Program will encourage the use of use of the industry page for electronically filing the Biennial or Annual report. The Hazardous Waste data specialist will enter any reports not filed electronically, review and analyze all report data, research inconsistencies, direct the required changes to the reports, and approve final reports.

2. CM&E – The Hazardous Waste Program specialists will enter CM&E data within 30 days of the action taken at their assigned facilities. Data will be reviewed at least quarterly to determine and resolve any data issues. The Hazardous Waste Program data specialist will prepare a quarterly report to identify any site status changes, unresolved violations, and other requested data and submit the report to the Program Manager and the compliance and enforcement lead specialist. Once finalized, the report will be submitted to EPA.

3. Corrective Action – The Hazardous Waste Program staff will enter site information within 30 days of submittal from a site or decision from the department. The Hazardous Waste Program data specialist will prepare quarterly reports on the status of statewide corrective action sites and submit it to the Program Manager and Contaminated Sites Program liaison. Once finalized, the report will be submitted to EPA.

4. E-Manifest – EPA Region 10 will be responsible for processing e-manifest data and collecting fees. The data will be used by the Hazardous Waste Program for data analysis and reporting.

5. Financial Assurance – The Hazardous Waste Program staff will enter financial assurance information for assigned facilities. The data will be reviewed and updated at least annually to ensure proper reporting.

6. Geographic Information System (GIS) – The Hazardous Waste Program staff will review and confirm the GIS data for each site for accuracy and correct the information where errors are noted.

7. Handler – The Hazardous Waste Program will be responsible for reviewing and ensuring complete handler information is entered in RCRAInfo and reviewing and confirming annual and out of cycle site identification forms for correct information and working with the site to implement corrections.

8. Permitting/Closure – Documentation submitted on the Hazardous Waste Permit Information Form (EPA 8700-23 Part A) will be processed and entered in RCRAInfo within 30 days of receipt. In cases where the department does not have regulatory authority, the information will be immediately forwarded to EPA Region 10. All state activities relating to permitting and closure will be entered into RCRAInfo by the specialist assigned to the site within 30 days.

9. PCBs – All data related to the generation and disposal of federally regulated PCB waste will be recorded in the RCRAInfo database by the Hazardous Waste Program data specialist within 30 days of receiving the information.

**Dispute Resolution:** The Hazardous Waste Program and EPA Region 10 agree to resolve disputes at the staff level whenever possible. Once a data issue is identified, the agency identifying the issue will contact the other agency to report and discuss the data in question. If staff cannot resolve the problem, it will be elevated to the data specialist or manager for resolution, and if no resolution is met, it will continue to be elevate to the next level of management. Final authority for dispute resolution will rest with the Director of the EPA Region 10 Land Chemicals and Redevelopment Division and the Director of the Division of Environmental Health. Both agencies will strive to resolve any RCRAInfo related issues within 30 days of identification.

Amendment: Should any significant changes occur in RCRAInfo database structure or policies, the authorization relationship between the department and EPA Region 10, or if the department determines the need to establish a separate database, the Hazardous Waste Program and EPA Region 10 agree that this document may be amended to establish provisions that ensure timely management of quality data in RCRAInfo.

Signatures: The individuals signing below agree to ensure the RCRAInfo data management is properly administered by the Hazardous Waste Program and EPA Region 10. This agreement does not affect the legal rights that either party has, nor does it provide any rights to non-signing facilities or persons. Once signed, this document will continue to be in effect until modified by mutual consent. Any issues not covered by this agreement will default to the RCRA Program Memorandum of Agreement.

United States                                         Alaska Department of
Environmental Protection Agency        Environmental Conservation
Region 10                                             Environmental Health Division
Land Chemicals and
Redevelopment Division


_____        _____
Tim Hamlin                                          Christina Carpenter
Director                                               Director

Date _____        Date _____