

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

BACKGROUND

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

In the mid 1990's, EPA and the States and Territories (States) recognized the importance of reassessing the information needs of the RCRA Subtitle C Hazardous Waste Program. To meet these needs, EPA through its Waste Information Needs (WIN) initiative and the States through their Information Needs for Making Environmental Decisions (INFORMED) initiative established the collaborative WIN/INFORMED effort in 1996 to conduct the reassessment as well as design, develop, and implement the recommended changes to the information system now known as RCRAInfo.

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

The final major upgrade to RCRAInfo through the WIN/INFORMED effort was of the Permitting and Corrective Action modules. Most of the recommended changes to these two modules were implemented through the release of RCRAInfo V.4.0 in December 2008. In addition to the Permitting and Corrective Action module changes, two new modules were recommended and approved for development and deployment into RCRAInfo. These include a Financial Assurance (FA) module and a Geographic Information System (GIS) module. The GIS module was implemented in the December 2008 V.4.0 release, but the FA module release was delayed until spring 2009 due to a need for additional changes based on feedback received during the December 2008 National RCRAInfo User Conference .

With completion of the final program area assessment under the WIN/INFORMED initiatives, the RCRAInfo Change Management Process was developed in recognition that assessment of and changes to the information system in support of the RCRA Subtitle C Hazardous Waste Program will continue to be needed in the future based on the continuing change and evolution of the RCRA C program and information technology. This effort is needed to maintain RCRAInfo as the state of the art data management system EPA and the States have worked so diligently over the years to make it.

ISSUE

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

Certainly, the States recognize that a certain amount of time and effort will always be required to address routine glitches and bugs in an electronic data system. However, the States are greatly concerned that current circumstances could deteriorate even further to the point that EPA RCRAInfo resources will not be able to maintain and support the vital RCRA Subtitle C program information needs.

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

POSITION

It is the position of ASTSWMO that EPA should continue its support of the RCRA Subtitle C Hazardous Waste Program’s critical information management needs through appropriate resource allocation in order to continue maintenance and development of RCRAInfo in the following ways:

- Provide sufficient funding to ensure the RCRAInfo staff will remain stable and staffed at a level that will allow them to make necessary module changes and upgrades, revise and add reports as needed, and provide regular training and assistance.
- Continue to partner and collaborate with State programs to ensure that information needs for the RCRA programs are being met.
- Ensure that RCRAInfo remains stable and state of the art, thus ensuring that States and regions will continue to use it as their main source and repository of hazardous waste information. There are nearly 2,300 State and EPA RCRAInfo users.

- Ensure that the changes and enhancements to RCRAInfo are made in an expedient and reliable manner that is both timely and at consistent intervals to allow the data provided and distributed to be of the highest quality.
- Work with other EPA offices (Office of Environmental Information and Office of Enforcement and Compliance Assurance) to make certain the information from RCRAInfo is provided to the public¹ in a timely and accurate manner.
- Ensure that the Change Management Process, with referrals from the User Support Issue Tracking System (USITS) within RCRAInfo, is the only mechanism through which to facilitate change to RCRAInfo.
- Continue to ensure RCRAInfo has sufficient flexibility to allow States and regions to track implementer-specific events while maintaining enough uniformity for consistent national reporting.
- Continue to create and revise reports to meet the needs of the States, the regions, Headquarters, Congress, and interested public.
- Continue to ensure that, through the use of training, good software design, and appropriate QA/QC reports, the content of RCRAInfo is of the highest quality.
- Ensure that RCRAInfo continues to be easy to use for both data input and data retrieval and is easy to understand.
- Continue to communicate and work with the RCRAInfo Change Management Process groups, the ASTSWMO Hazardous Waste Program Information Management Task Force (PIM TF), the States, the regions, and the public concerning the use of and changes to RCRAInfo.
- Consider creative and innovative ways to expand and incorporate more direct assistance and input from EPA regions and the States.

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

Approved by the ASTSWMO Board of Directors, April 14, 2009, in Columbus, OH.

¹ Over 5 million searches have now been made by the public on the ECHO web site. While relatively few data complaints have been submitted, RCRAInfo staff should be available to support attempts to correct data the public claims is in error.