PRIVACY IMPACT ASSESSMENT

Submit in *Word format* electronically to: Judy Hutt (hutt.judy@epa.gov)

Office of Environmental Information

System Name: NPDES Withdrawal Petition Management	
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Date: 11/20/2012	**Phone: 202-564-3356**
This project is in the following stage(s):	
Definition ☐ Development/Acquisition Implementation ☐	
Operation & Maintenance X Termination ☐	

I. Data in the System

1. Describe what data/information will be collected/contained in the system.

EPA will post citizen-submitted withdrawal petitions and EPA decisions regarding those petitions. Authorized EPA staff will use the system to compile petitions the agency has received through the mail or by email; citizens will not submit petitions via this website. Some of the petition documents contain the names, email addresses, and physical addresses of the submitting person or organization.

2. What are the sources and types of the data/information in the system?

Documents received from the public mostly in the form of PDF and Microsoft Word Documents and their associated metadata.

3. How will the information be used by the Agency?

The Agency will use the information to internally evaluate the petitions and the authorized state NPDES programs to which the petitions refer.

4. Why is the information being collected? (Purpose)

EPA receives petitions from citizens urging EPA to withdraw authorized state NPDES permitting programs (40 C.F.R. 123.64(b)(1). This website will include the petitions received from the public and EPA responses to the petitions. By making these public documents available on a website, EPA meets the goal of increased governmental transparency as outlined in the Clean Water Act Action Plan.

II. Access Controls for the Data

1. Who will have access to the data/information in the system *(internal and external parties)*? If contractors, are the Federal Acquisition Regulations (FAR) clauses included in the contract (24.104 Contract clauses; 52.224-1 Privacy Act Notification; and 52.224-2 Privacy Act)?

EPA staff, primarily within OWM/WPD/SRB.

2. How have you educated those having authorized access about the misuse of PII data?

Yes. Their education is covered by the annual Information Security Awareness training.

3. Do other systems share or have access to data/information in this system? If yes, explain who will be responsible for protecting the privacy rights of the individuals affected by the interface? *(i.e., System Administrators, System Developers, System Managers)*

No, this is a new stand alone system.

4. Will other agencies, state or local governments share or have access to data/information in this system *(includes any entity external to EPA.)*? If so, what type of agreement was issued? *(i.e., ISA, MOU, etc.)*

No, the content is just for EPA use.

5. Is the data and /or processes being consolidated? If so, are the proper controls in place to protect the data from unauthorized access or use?

No, this is a new standalone system.

III. Attributes of the Data

1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed.

EPA staff requires a system that allows them to securely and efficiently manage NPDES Withdrawal Petition information. The APEX environment is a cost-efficient solution for this requirement.

2. How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier more than 50% of the time? If yes, explain. *(A personal identifier is a name, Social Security Number, or other identifying symbol assigned to an individual, i.e. any identifier unique to an individual.)*

Each authorized EPA staff user will manage the system using a unique username and password. No personal identifiers are involved. The data contained in the system is for public release and will be viewed via standard web browser. Users will retrieve the petitions by date, state, keyword, EPA region, or petition status. Users will not retrieve the data using a person's name.

3. .Do individuals have the opportunity to decline to provide information or to consent to particular uses of the requested information? If yes, how is notice given to the individual? *(Privacy policies must clearly explain where the collection or sharing of certain information may be optional and*

provide users a mechanism to assert any preference to withhold information or prohibit secondary use.)

Not applicable.

4. Where is the Web privacy policy stated?

Not applicable. The data management and entry system is solely for internal use by EPA staff, however EPA privacy statement is referenced in the page footer. Published information within the system is made available to the public via standard web browser.

IV. Maintenance and Administrative Controls

1. Has a record control schedule been issued for the records in the system? If so, provide the schedule number. *(You may check with the record liaison officer (RLO) for your AA-ship or Tammy Boulware (Headquarters Records Officer) to determine if there is a retention schedule for the subject records.)*

Records will continue to be issued under the existing schedule number PROG 006b, Program Management Files.

2. While the data are retained in the system, what are the requirements for determining if the data are still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

Not applicable, system solely for internal use by EPA staff.

3. Will this system provide the capability to identify, locate, or monitor individuals? If yes, explain.

No locating or monitoring is involved. The system will only identify which authorized user is associated with the modification of petition information.

4. Does the system use any persistent tracking technologies?

No.

5. Under which System of Records (SOR) notice does the system operate? Provide the name of the system and its SOR number if applicable. A list of Agency SORs are posted at http://www.epa.gov/privacy/notice/. *(A SOR is any collection of records under the control of the Agency in which the data is retrieved by a personal identifier.)*

Not applicable.