



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 03 2011

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Response to the Office of Inspector General Briefing Report: EPA Could Improve RCRAInfo Data Quality and System Development, Report No: 11-P-0096, dated February 7, 2011

FROM: Mathy Stanislaus
Assistant Administrator

A handwritten signature in dark ink, appearing to read "Mathy Stanislaus".

TO: Arthur A. Elkins, Jr.
Inspector General

Thank you for providing us with the opportunity to comment on and respond to the findings and recommendations in the "Briefing Report: EPA Could Improve RCRAInfo Data Quality and System Development."

We agree with the recommendations and we believe we have already successfully implemented all of them. See the attached chart for corrective action milestones and completion dates.

If you have any questions concerning the audit response, please contact Lori Furr, Acting Chief, Information Collection and Analysis Branch (703-605-0596) or Debbie Goodwin of the RCRAInfo Team (703-308-7877).

Attachment

OSWER / OSW / PIID / ICAB Response to Briefing Report
“EPA Could Improve RCRAInfo Data Quality and System Development”
 Project No: 11-P-0096, dated February 7, 2011

Rec. No	OIG Recommendation	Action Official(s)	Proposed Corrective Action	Completion Date
1	Implement a procedure for regional personnel to notify a state when changes are made to handler records.	Director, Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response	OCRC agrees with this recommendation and changed the process for loading BR data. Now the States and not the Regions enter and modify their own data.	Implemented with the BR 2009 cycle 4/1/2010
2	Conduct training for data entry personnel regarding the proper procedures for documenting updates to RCRAInfo.	Director, Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response	OCRC agrees with the importance of this recommendation and has, and will continue to stress this during our National Conferences and during our training sessions and outreach activities.	Last stressed during the 2010 National Conference (3/1/2010 – 3/5/2010)
3	Provide guidance and policy from the program level regarding retaining source documentation.	Director, Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response	OCRC agrees with this recommendation as far as making suggestions and recommendations to States regarding the importance of document retention, but each State creates their own policy, which ORCR cannot dictate. We will continue to stress this during our National Conferences and during our training sessions and outreach activities.	Last stressed during the 2010 National Conference (3/1/2010 – 3/5/2010)
4	Provide additional guidance to states to facilitate accurate conversion of hazardous waste amounts as required for input into RCRAInfo.	Director, Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response	ORCR agrees with this recommendation and has been providing this guidance in the BR Instruction booklets since 1999. We will continue to include this Weight and Volume Conversion guidance in all our BR Instruction booklets and will continue to	Last stressed during the 2010 National Conference (3/1/2010 – 3/5/2010) and the RCRAInfo

			stress the importance of these conversions during our National Conferences and during our training sessions and outreach activities.	Regional Training (3/1/2011 – 3/2/2011)
5	Implement a control procedure to enforce that business rule changes are updated in the RCRAInfo system documentation.	Director, Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response	ORCR agrees with this recommendation and has created and been running monthly data quality queries to check production data for: 1) orphans, 2) data not matching edit checks, 3) when each table was last changed (to ensure data is being entered), and 4) translator activity: when, what, and success or failure of submission. When invalid data is found, ORCR works with the Region and State to correct the data.	Began running this monthly - 6/1/2010
6	Implement a control procedure to enforce that RCRAInfo coding changes are tested prior to placement into production.	Director, Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response	ORCR agrees with the importance of this recommendation and has in place a procedure of testing each release prior to implementation. First the developer tests the release until satisfied it meets the requirements and specifications. Then it is tested by our independent contractor testers. Once they are satisfied, the software is placed in the RCRAInfo Pre-Production environment and a News Letter (e-mail via Listserv) is sent to all RCRAInfo Users announcing an open testing period for the issues in the upcoming release. The user community is given anywhere from 2 to 6 weeks, or more, to conduct their testing in Pre-Production. They also list any issues/problems found in the	Began 7/2/2000 thru our latest release which had user testing opened in RCRAInfo Pre-Production 12/27/10 with the software then implemented in RCRAInfo Production 2/14/2011.

			RCRAInfo USITS tracking system and they are resolved and re-tested. All USITS issues are resolved and tested again before the software is moved into RCRAInfo Production.	
7	Notify states to use the test environment for all testing instead of the production environment.	Director, Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response	OCRC agrees with the importance of this recommendation and has and will continue to stress this during our National Conferences and during our training sessions and outreach activities.	Last stressed during the 2010 National Conference (3/1/2010 – 3/5/2010)
8	Implement a procedure to review the production database for test data on a semiannual basis.	Director, Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response	ORCR agrees with this recommendation and has created and added to our monthly data quality queries a check of RCRAInfo production data for any field containing the word “test”. When data is found, ORCR works with the Region and State to remove the data.	Began 2/28/2011