



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

NOV 22 2010

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

Dear State Commissioner:

During Congressional testimony in 2009, EPA and ECOS pledged to improve efforts to quality assure compliance and enforcement information. The 2009 Data Verification Process accomplished this commitment when it was completed earlier this year. We are now continuing this commitment by providing review opportunities for 2010 information. The Data Verification Process is designed to ensure that states get credit for the activities that were performed, that the State Review Framework rests on a solid foundation of quality data, and that the public receives accurate information in the Enforcement and Compliance History Online (ECHO) and related websites. The ongoing assistance and commitment of the states to provide accurate information in the national databases is the key to ensuring quality information. I am requesting that you work with us to make the 2010 process successful.

Please review the attachment for changes from last year and more detailed instructions for completing the process. Here is a summary of key milestones:

October	EPA opens doors to 2010 Data Verification Website
November	States should get familiar with the site while waiting for final FY 2010 data to be entered.
January 18, 2011	First Deadline to enter RCRAInfo data into the data systems for a final review of the data in OTIS prior to completion of the Data Verification Process
January 20, 2011	First Deadline to enter AFS, PCS, and ICIS-NPDES data into the data systems for a final review of the data in OTIS prior to completion of the Data Verification Process
<b>February 8, 2011</b>	<b>Final Deadline to enter RCRAInfo data into the data systems and submit corrections and caveats to EPA for information that will be released on ECHO</b>
<b>February 10, 2011</b>	<b>Final Deadline to enter AFS, PCS, and ICIS-NPDES data into the data systems and submit corrections and caveats to EPA for information that will be released on ECHO</b>
March 2011	Data Verification Process results released on ECHO

Thank you for your hard work in 2009. Due to your cooperation and commitment, the 2009 Data Verification Process was successful. Thank you in advance for your support in the 2010 Data Verification Process. Please feel free to write to [dataverification@epa.gov](mailto:dataverification@epa.gov) with any questions on the Data Verification Process.

Sincerely,

A handwritten signature in black ink that reads "Lisa C. Lund". The signature is written in a cursive style with a large initial "L".

Lisa C. Lund  
Director  
Office of Compliance

Attachment

## **ADDITIONAL INFORMATION ON THE 2010 DATA VERIFICATION PROCESS**

### **Lessons Learned and Changes for 2010**

To determine what changes were needed to the pilot phase, EPA conducted a listening session on July 15, 2010 to obtain additional feedback from the states and state associations on recommended improvements for the 2010 Data Verification Process. Key messages along with our responses from the listening session were:

- The EPA Online Tracking Information System (OTIS) Data Verification website was easy to navigate and intuitive.
  - Due to this comment, very few changes were made to the website.
- There was not sufficient time to complete the Data Verification Process in 2009.
  - To provide additional time for states to complete the Data Verification Process, the Data Verification Process is beginning 5 months prior to the deadline for completion of the process.
- Some states reported problems with individual data metrics.
  - EPA has been following up with states individually on these issues. Additional time to complete the process will allow for more unique circumstances to be evaluated and addressed prior to the deadline for the process.
- Some states reported concerns that the Data Verification Process requires resources that are unavailable to the states at this time.
  - For states that are concerned about the resource constraints required for the Data Verification Process, we encourage states to utilize the “activity-based” review which provides a much more streamlined review process (than the full review of SRF metrics).

As noted above, all of the comments received through the listening session and other communication channels were considered when designing the 2010 Data Verification Process. The information below provides an overview of the 2010 Data Verification Process and available resources. More details on the overall process are available at [www.epa-otis.gov/otis](http://www.epa-otis.gov/otis).

Last year, the Data Verification Process was delayed because many states were unable to verify the data by the deadline. This problem should be resolved by providing additional time for the review process. In addition to providing additional time for the review, we will also update the Data Verification web page on OTIS weekly with a list of states that have completed the verification process to avoid any discrepancies near the “freeze” dates.

### **Resources Available for Data Verification**

EPA has updated the “Data Verification” web page that resides on OTIS for the 2010 Data Verification Process. The page consolidates several resources that implementing agencies can use to ensure that activities are properly reflected in the national systems. The Data Verification page also contains links to EPA and State Data Stewards, and information about data quality and reporting requirements. The Data Verification web page is available at: [http://www.epa-otis.gov/otis/data\\_certification/data\\_certification.html](http://www.epa-otis.gov/otis/data_certification/data_certification.html). EPA will regularly update this web page with information and tips for quality assuring information, and will provide the status of data refreshes. Project updates will be posted here as well.

The Data Verification Page has two search pages.

- **2010 State Review Framework Data Metrics Data Verification Tool.** 2010 data are available and can be reviewed now. Corrections or updates made via the national databases will be automatically reflected in the site under the existing monthly data refresh process. Aggregate and facility-level data are available for review. It is important that any changes be made in the underlying databases by COB on January 20th (AFS, PCS, ICIS-NPDES) and COB January 18th for RCRAInfo to provide a final review of the data in OTIS prior to the final deadline to enter data in the data systems and submit caveats and corrections in February. The final deadline to make changes in the underlying databases and submit caveats and corrections is COB February 10<sup>th</sup> (AFS, PCS, ICIS-NPDES) and COB February 8<sup>th</sup> for RCRAInfo. EPA expects that information products will be released to the public 4-6 weeks after this final deadline and data freeze – specific release dates will be forthcoming. Please note that there are a small number of data metrics that are not available now (the website contains information on when these metrics will become available).
- **2010 Enforcement Activity List.** This new tool provides a listing of all facilities at which an activity has been performed by the state. States can download a comprehensive list of facilities that will indicate, for example, whether an inspection has been done, violation identified, SNC/HPV identified, informal action taken, formal action taken, or penalty taken. It is possible to sort this information by local district (if states want to exclude facilities that have their own jurisdiction). This tool augments the SRF Data Metrics Data Verification Tool. The SRF Data Metrics often re-use the same data across many metrics; whereas, the 2009 Enforcement Activity List will list key activities in one comprehensive output. Instructions for using the tool are on the website.

**State Data Verification Steps for 2010 Data:** (Below is an overview of the steps in the 2010 Data Verification Process. Please see EPA's OTIS [www.epa-otis.gov/otis](http://www.epa-otis.gov/otis))

1. Review the 2010 SRF Data Metrics to ensure that the numbers accurately reflect reportable activities performed by the state.
  - a. If the overall numbers shown in the SRF data metrics raise issues for the state, the 2010 Enforcement Activity List download provides an easy way to look at the full list of activities, and cross-reference them with state information.
  - b. If the state does not have the resources to review the full set of SRF Data Metrics, EPA strongly suggests that the state review the 2010 Enforcement Activity List (which requires less time to quality assure).
2. After reviewing the data, make any necessary corrections in the national data system.
3. If additional caveats, correction files, or web links are necessary, send them to the Data Verification email box ([dataverification@epa.gov](mailto:dataverification@epa.gov)).
  - a. Also, EPA has heard from states that they often offer more data on their own websites, and EPA would like to provide links to this data to the public on ECHO. A

draft table of the information EPA found is posted on OTIS (see home page link to "Additional State Data").

- b. Please feel free to send comments, updates, and/or additional links regarding this table to EPA via the Data Verification email box.
4. If data problems exist that require consultation with EPA, please contact the designated Regional Data Steward. If national assistance is needed, contact the national database manager. These contacts are provided as a link on the Data Verification web page.
5. **Correct/update the national data systems for the first deadline by January 18th (RCRAInfo) and January 20th (AFS, PCS, ICIS-NPDES).**
6. **Correct/update the national data systems for the final deadline by February 8th (RCRAInfo) and February 10th (AFS, PCS, ICIS-NPDES).**
7. By February 10<sup>th</sup>, please notify EPA that you have completed your review at [dataverification@epa.gov](mailto:dataverification@epa.gov) (details below).

### **Instructions for Notifying EPA of Completed Review**

EPA has set up a special email box ([dataverification@epa.gov](mailto:dataverification@epa.gov)) to enable states to easily communicate with EPA regarding the status of their review. If there are specific issues that cannot be corrected before the data freeze, states may provide information about what data problems remain (suggested format for providing that information is below). States do not need to submit verification work files used during their review process.

#### **Examples (Completed Review – No remaining issues)**

- a. Subject: Alabama Full Data Verification  
Email text: The State of Alabama has reviewed the 2010 SRF data for CAA, CWA, and RCRA and has made appropriate corrections.
- b. Subject: Arkansas RCRA Data Verification  
Email text: The State of Arkansas has completed data verification for the 2010 SRF RCRA data. (The state may have chosen to send separate emails for each media).

#### **Examples (Problems Remaining)**

- c. SUBMISSION OF SHORT CAVEAT TEXT
  - Subject: California Full Data Verification and Caveats  
Email text: The State of California has completed its review of CAA, CWA, and RCRA data. One data issue remains, so California would like the following caveat posted on the EPA website. "A problem with the translation of data between EPA and the state exists for inspection data, so the data metrics do not reflect the complete number of activities performed by the state."
- d. SUBMISSION OF CORRECTION FILE
  - Subject: South Dakota - Full Data Verification and File  
Email text: The State of South Dakota has completed its review of CAA, CWA, and RCRA data. One data issue remains relating to CWA data, and the state would EPA to post a correction file with the

correct information. <<Attach file with description of the issue and corrected data.>>

e. SUBMISSION WITH WEB LINK

- Subject: Maine - Full Data Verification and Web Link  
Email text: The State of Maine has completed its review of CAA, CWA, and RCRA data. Data issues remain for CAA and RCRA, and the state has posted information about the problems at the following URL <<<http://www.....>>>. The state requests that EPA link to this site in the caveats section for CAA and RCRA only.

*NOTE: States do not need to turn in spreadsheet results used internally to perform the review; however, if consultation is needed with the regions or HQ, it will be helpful for the states to retain this information for future troubleshooting.*