

Introduction to State Review Framework (SRF) Data Metrics Spreadsheet
Resource Conservation and Recovery Act (RCRA)
Version 1.1 (DRAFT)
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Background on RCRA

The Resource Conservation and Recovery Act (RCRA) authorizes EPA to regulate the generation, treatment, storage, transportation, and disposal of hazardous waste as set out in Subtitle C of RCRA. Under Section 3006 of Subtitle C, the states may be authorized to administer and enforce a state hazardous waste program in lieu of the federal Subtitle C program. Currently, 48 states are authorized to administer and enforce Subtitle C. Those states or territories not authorized remain the responsibility of EPA. The EPA Regional office is then the responsible agency. This is why many metrics have State, EPA or Combined evaluating capabilities..

State RCRA programs determine compliance, and ensure adequate coverage of the regulated universe. Regions conduct program oversight and capacity-building and undertake federal intervention, after consultation with the affected states, when appropriate to address complex and multi-state compliance issues.

The State Review Framework (SRF) is a tool designed to uniformly evaluate the performance of the regulatory agency, usually an authorized state program but sometimes an EPA Regional office, administering the RCRA Subtitle C compliance and enforcement program. This Data Element Dictionary contains a description of the File Review Metrics and Data Metrics used in the State Review Framework (SRF) review to assess a RCRA program when measured against the requirements of EPA or state policies and guidance and other operating principals.

The File Review Metric confirm or verify that data in RCRAInfo are complete, accurate and were entered into the national data base in a timely manner. The Data Metrics are data quality, goals, review indicator, or simply informational. The specific File or Data Metric program guidance or policy are listed below:

- Elements 1 - 3: National Program Managers' (NPM) Guidance,
- Element 4: Relevant agreements between EPA and authorized States/Tribes
- Element 5: RCRA Statute, NPM Guidance
- Element 6: 1998 Revised RCRA Inspection Manual, NPM Guidance
- Elements 7 – 12: RCRA ERP, RCRA Penalty Policy, NPM Guidance

Basic Information on the RCRA State Review Framework Data Metrics Spreadsheet

The data metrics spreadsheet provides basic information on 1) the definition of the data metric and 2) what aspects of the RCRA program the metric is used to evaluate. The spreadsheet also identifies whether the information for a particular data metric is required to be reported to the national data system. Although EPA does not require all data to be reported to the national data system, the regulatory authority is responsible for determining and tracking compliance status and enforcement and maintaining data on compliance status. Data metrics that are required to be reported to the national data system will provide a fairly complete picture of this part of the RCRA program. Often times, when a data metric is not required to be reported to the national data system, the regulatory authority has more complete data that will be provided to the EPA at the time the state review begins. To obtain more complete data on the metrics that are not required to be reported to the national data system, the state should be contacted directly.

Resource Conservation and Recovery Act Data Metrics Spreadsheet (Public Version 1.1)

Metric #	Name	Description	Guidance Requirement or Goal	Universe	State and EPA, Data Combined Region/State, or State-only Data?	Metric Type
1. Data Completeness. Degree to which the Minimum Data Requirements are complete.						
1a1	Site universe counts complete	1a1. Number of operating TSDFs in RCRAInfo	Region and state should agree on operating universe count.		State-only	Data Quality
1a2		1a2. Number of active LQGs in RCRAInfo	Region and state should agree on active universe count.		State-only	Data Quality
1a3		1a3. Number of active SQGs in RCRAInfo	Region and state should agree on active universe count.		State-only	Data Quality
1a4		1a4. All other active sites in RCRAInfo	Region and state should agree on active universe count.		State-only	Data Quality
1a5		1a5. Number of LQGs per latest Biennial Report (BR) that falls w/in SRF review period			State-only	Data Quality
1b1	Inspection counts complete	1b1. Number of inspections performed by state during reporting period.	Mandatory data elements are listed in the RCRAInfo documentation.	all	State-only (but separate EPA # also provided)	Data Quality
1b2		1b2. Number of sites inspected during reporting period	Mandatory data elements are listed in the RCRAInfo documentation.	all	State-only (but separate EPA # also provided)	Data Quality
1c1	Violation counts complete	1c1. Number of sites with open violations during review year, regardless of date determined	Mandatory data elements are listed in the RCRAInfo documentation.	all	State-only (but separate EPA # also provided)	Data Quality
1c2		1c2. Number of sites with violations determined during review year			State-only (but separate EPA # also provided)	
1d1	Informal action counts complete	1d1. Number of sites with informal enforcement actions	Mandatory data elements are listed in the RCRAInfo documentation.	all	State-only (but separate EPA # also provided)	Data Quality
1d2		1d2. Number of informal enforcement actions issued	Mandatory data elements are listed in the RCRAInfo documentation.	all	State-only (but separate EPA # also provided)	Data Quality
1e1	SNC counts complete	1e1. Number of new SNCs detected in last FY;	Mandatory data elements are listed in the RCRAInfo documentation.	all	State-only (but separate EPA # also provided)	Data Quality
1e2		1e2. Number of sites in SNC status in last FY	Mandatory data elements are listed in the RCRAInfo documentation.	all	State-only (but separate EPA # also provided)	Data Quality

Metric #	Name	Description	Guidance Requirement or Goal	Universe	State and EPA, Data Combined Region/State, or State-only Data?	Metric Type
1f1	Formal action counts complete	1f1. Number of sites with formal actions.	Mandatory data elements are listed in the RCRAInfo documentation.	all	State-only (but separate EPA # also provided)	Data Quality
1f2		1f2. Number of formal actions taken.	Mandatory data elements are listed in the RCRAInfo documentation.	all	State-only (but separate EPA # also provided)	Data Quality
1g	Assessed penalties complete	Total amount of final (assessed) penalties	Mandatory data elements are listed in the RCRAInfo documentation.	all	State-only (but separate EPA # also provided)	Data Quality
2. Data Accuracy. Degree to which the Minimum Data Requirements are accurate (example, correct codes used, dates are correct, etc.).						
2a1	Accuracy of SNC determination date data	2a1. Measures "closeness" between SNC determination and formal enforcement action. Shows the number of sites that were "SNC determined" on same day as formal action.	ERP states that the data should be entered when the determination is made; determination, and therefore data entry, must be made by 150 days after Day Zero. SNC entry should not be withheld until the action is completed.	All SNCs that have reached formal action	State-only	Review Indicator
2a2		2a2. Measures "closeness" between SNC determination in last FY and formal enforcement action. Shows the number of sites with SNC determination within one week of formal action.		All SNCs that have reached formal action	State-only	Review Indicator
2b	Longstanding secondary violations not "returned to compliance" or redesignated as SNC	Number of sites in violation for greater than 240 days. This measure is designed to ensure that violations are given an end date or sites are redesignated SNC when appropriate.	The ERP states that sites designated as secondary violators should be re-designated as SNC if the violator does not return to compliance in 240 days.	All sites	State-only (but separate EPA-only # also provided)	Data Quality

3. Timeliness of Data Entry. Degree to which the Minimum Data Requirements are complete.						
3a	Timely entry of SNC data	Percent of SNCs that are entered to RCRAInfo more than 60 days after the determination. Measures the "lag" between the date of SNC determination and the actual reporting of the SNC determination to RCRAInfo.	ERP states that the data should be entered when the determination is made (determination must be made by 150 days after Day Zero). SNC entry should not be withheld until the action is completed. EPA expects SNC data to be entered more quickly than 60 days after determination, so this metric provides some "cushion".	All SNCs	State-only (but separate EPA-only % also provided)	Review Indicator
3b	Comparison of frozen data set	Percent change in each of the Element 1 data metrics between the frozen data set and the current data metrics results.	The frozen data set represents the data in RCRAInfo at a time when most required data entry for the fiscal year would be expected to be complete.	All	State-only (but separate EPA-only or combined counts available when applicable)	Review Indicator
4. Completion of Commitments. Degree to which all enforcement/compliance commitments in relevant agreements (i.e., PPAs, PPGs, categorical grants, CMS plans, authorization agreements, etc.) are met and any products or projects are completed.						
No File Review Metrics for Element 4						
5. Inspection Coverage. Degree to which state completed the universe of planned inspections/compliance evaluations (addressing core requirements and federal, state and regional priorities).						
5a	Inspection coverage for operating Treatment, Storage, and Disposal Facilities (TSDFs)	Per RCRA, region/state should inspect all operating TSDFs within two years; however, if facilities included on the list were not operating for the full two years, inspection is not expected.	Operating TSDFs should be inspected every 2 years.	Operating TSDFs	State-only (but separate combined % also provided)	Goal
5b	Annual inspection coverage - Large Quantity Generators	National measure guidance calls for 20% annual coverage. If the region/state falls into an exception based on regional commitments, the region should utilize metric 4a to indicate actual commitments or agreements.	20% annual inspection coverage for LQGs. States with approved plans may substitute other facility inspections for LQGs per Guidance for FY08 RCRA Core LQG Pilot Projects; this should be documented in report.	LQGs, based on latest Biennial Report (BR) universe that falls w/in SRF review period	State-only (but separate combined % also provided)	Goal

5c	Five-year inspection coverage - Large Quantity Generators	National guidance calls for 100% inspection coverage of LQGs over 5 years.	All LQGs should be inspected within 5 years, though if below the 100%, some may be attributed to universe changes or other reasons. States with approved plans may substitute other facility inspections for LQGs per Guidance for FY08 RCRA Core LQG Pilot Projects (specify in report).	LQGs	State-only (but separate combined % also provided)	Goal
5d	Five-year inspection coverage - Active Small Quantity Generators	While no national goal exists for inspections at SQGs, inspection coverage of all RCRA-regulated facilities is a requirement of the regulations regarding authorization of state hazardous waste programs (40CFR271.15 - B2). This metric helps provide a complete picture of state evaluation activity, and is necessary when SQG inspections are substituted for LQG inspections. Informational-only metrics are not used in themselves to assess state performance.	None	Active SQGs	State-only (but separate combined % also provided)	Informational-only
5e1	Inspections performed at sites other than those listed in 5a-d in last five years	5e1. Number of inspections at CESQGs.	None	Active CESQGs	State-only (but separate combined # also provided)	Informational-only
5e2		5e2. Number of inspections at transporters.		Active transporters	State-only (but separate combined # also provided)	
5e3		5e3. Number of inspections at non-notifiers.		Non-notifiers	State-only (but separate combined # also provided)	
5e4		5e4. Number of inspections at sites other than those listed in 5a-d and 5e1-5e3.		All active sites other than those listed in 5a-d and 5e1-5e3	State-only (but separate combined # also provided)	
6. Quality of Inspection or Compliance Evaluation Reports. Degree to which inspection or compliance evaluation reports properly document observations, are completed in a timely manner, and include accurate description of observations.						
No File Review Metrics for Element 6						

7. Identification of Alleged Violations. Degree to which compliance determinations are accurately made and promptly reported in the national database based upon compliance monitoring report observations and other compliance monitoring information (e.g., facility-reported information).						
7c	Violations found during inspections	Number of non-SNC sites with violations found during the review year over number of sites inspected in review year.	Further discussion recommended as deemed warranted by the region.	All sites with inspection types CAC, CDI, CEI, CSE, FCI, GME, OAM	State-only (but separate EPA-only % also provided)	Review Indicator
8. Identification of SNC and HPV. Degree to which the state accurately identifies significant noncompliance/high priority violations and enters information into the national system in a timely manner.						
8a	SNC identification rate	This measure helps assess whether the region/state are actively identifying SNC problems from evaluations. Numerator=new SNC sites in last FY, Denominator=evaluated sites in last FY.	Further discussion needed for regions/states below 1/2 of the national average. If SNC determinations are not being made, the region should evaluate whether the ERP is being followed.	All sites with inspection types CAC, CDI, CEI, CSE, FCI, GME, OAM	State-only (but separate combined % also provided)	Review Indicator
8b	Timely SNC determinations	% of SNC determinations (SNY date) completed within 150 days of "Day Zero" (first day of inspection) in last FY.	Goal is 100%	All SNCs	State-only (but separate EPA-only # also provided)	Goal
8c	SNC reporting indicator (actions receiving SNC listing)	Metric computes the % of formal actions taken during the FY that received a prior SNC listing, and benchmarks it to national average.	The RCRA ERP discusses the criteria for listing SNC. SNC normally requires a formal action. Some formal actions are taken at non-SNC, so there is not an expectation that 100% of sites with actions had SNC. File review recommended for regions/states below 1/2 of the national average.	All sites with actions	State-only (but separate EPA-only % also provided)	Review Indicator
9. Enforcement Actions Promote Return to Compliance. Degree to which state enforcement actions include required corrective action (i.e., injunctive relief or other complying actions) that will return facilities to compliance in a specific time frame.						
No File Review Metrics for Element 9						

10. Timely and Appropriate Action. Degree to which a state takes timely and appropriate enforcement actions in accordance with policy relating to specific media.						
10a	Timely action taken to address SNC	% of enforcement action/referral to DOJ/AG that have been taken within 360 days of Day Zero. Measured as number of SNC sites NOT exceeding 360 days from day zero over number of total SNCs in state. Note that ERP policy allows 20% of SNCs to exceed 360 timeliness milestone.	Of all enforcement actions taken within the fiscal year at SNC sites, 80% of SNC sites should receive a formal action or referral within 360 days of Day Zero.	SNC sites	State-only (but separate combined % also provided)	Review Indicator
10b	No activity indicator - formal actions	No formal actions taken by state in fiscal year.		All sites	State-only	Review Indicator
11. Penalty Calculation Method. Degree to which state documents in its files that initial penalty calculation includes both gravity and economic benefit calculations, appropriately using the BEN model or other method that produces results consistent with national policy.						
No File Review Metrics for Element 11						
12. Final Penalty Assessment and Collection. Degree to which differences between initial and final penalty are documented in the file along with a demonstration in the file that the final penalty was collected.						
12a	No activity indicator - penalties	No penalties taken by state in fiscal year.	-	All sites	State-only	Review Indicator
12b	Penalties normally included with formal enforcement actions	% of final formal enforcement actions that carry any penalty in last FY.	Program review necessary if state is below one half of the national average for % of actions with penalty.	All sites with state final formal actions	State-only (but combined % also provided)	Review Indicator

Acronyms and Notes	
BR	Biennial Report
CAC	Corrective Action Compliance Evaluation
CDI	Case Development Inspection
CEI	Compliance Evaluation Inspection
CESQG	Conditionally Exempt Small Quantity Generator
CFR	Code of Federal Regulations
CMS	Compliance Monitoring Strategy
CSE	Compliance Schedule Evaluation
DZ	Day Zero
EPA	U.S. Environmental Protection Agency
FCI	Focused Compliance Inspection
FY	Fiscal Year (The federal FY is October 1 through September 30)
GME	Groundwater Monitoring Evaluation
LQG	Large Quantity Generator
OAM	Operation and Maintenance Inspection
PPA	Performance Partnership Agreements
PPG	Performance Partnership Grants
RCRA	Resource Conservation and Recovery Act
RCRAInfo	RCRA Information System
SNC	Significant Non-Compliance
SQG	Small Quantity Generator
SRF	State Review Framework
TSDF	Treatment, Storage, and Disposal Facility