**Introduction to State Review Framework (SRF) Data Metrics Spreadsheet**
**Resource Conservation and Recovery Act (RCRA)**
**Version 1.2**
**October 29, 2009**

## 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 |

| Metric # | Name | Description | Guidance Requirement or Goal | Universe | State and EPA, Data Combined Region/State, or State-only Data? | Metric Type |
|---|---|---|---|---|---|---|
| **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 |

| Metric # | Name | Description | Guidance Requirement or Goal | Universe | State and EPA, Data Combined Region/State, or State-only Data? | Metric Type |
|---|---|---|---|---|---|---|
| 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

| Metric # | Name | Description | Guidance Requirement or Goal | Universe | State and EPA, Data Combined Region/State, or State-only Data? | Metric Type |
|---|---|---|---|---|---|---|
| **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 | | | | | | |

| Metric # | Name | Description | Guidance Requirement or Goal | Universe | State and EPA, Data Combined Region/State, or State-only Data? | Metric Type |
|---|---|---|---|---|---|---|
| **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 |