

Trading Partner Agreement Between the MA Department of Environmental Protection and the US Environmental Protection Agency

1 Overview – Exchange Of RCRA Handler Data

This agreement is a voluntary agreement between the Massachusetts Department of Environmental Protection, hereinafter referred to as DEP, and the US Environmental Protection Agency, with the US Environmental Protection Agency Region I acting as a representative for the Agency and hereinafter referred to as EPA, for the exchange of RCRA handler data via the National Environmental Information Exchange Network, hereinafter referred to as the Exchange Network.

2 Purpose

The purpose of this Trading Partner Agreement (TPA) is to identify the activities that DEP and EPA will undertake as partners in exchanging RCRA handler data via the Exchange Network.

This agreement does not supersede the existing Performance Partnership agreement between DEP and EPA, nor any future Memoranda of Understanding between DEP and EPA Region 1. It is intended to deal with the specifics of the Exchange Network flow.

3 Background

The US Congress enacted the Resource Conservation and Recovery Act (RCRA) in 1976 and passed major legislative amendments in 1984. The primary goals of RCRA are to protect human health and the environment from potential hazards of waste disposal; to conserve energy and natural resources; to reduce the amount of waste generated; and to ensure that wastes are managed in an environmentally sound manner.

RCRA gives EPA the responsibility for implementing the RCRA program. The act also allows EPA to authorize states to implement the RCRA requirements. EPA has authorized DEP to implement much of the RCRA program.

4 Partner Responsibilities

4.1 Data Exchange Mechanism and Schedule

The RCRA handler data exchange described in this document is a one way transfer of data, from the DEP node to the EPA's node, the Central Data Exchange (CDX). The exchange uses a "come and get it" model. That is, the EPA CDX node will initiate a

request to the MA node to get data on RCRA hazardous waste handlers. In response to that request, the MA node will submit the RCRA handler data to the EPA node.

The EPA will request the entire dataset of RCRA handler information, covering approximately 17,000 handlers. Because this is a fairly large amount of data, the exchange will use the asynchronous mode of operation. DEP will typically send the response during non business hours, when the DEP processing resources are not depleted by other tasks.

EPA will request the MA RCRA handler data once per month, on or after the 15th of the month.

4.2 Data Stewardship

The stewardship responsibilities of the two partners are established and acknowledged by this agreement. DEP will be the steward for all data on MA RCRA hazardous waste handlers in the RCRAInfo handler module. EPA maintains oversight responsibility for this data.

Each partner will provide notification and documentation to the other partner when either decides that data quality, completeness or timeliness has fallen short of expectations.

4.3 Use of Data, Access to Data

DEP will upload RCRA handler data to the RCRAInfo database using the Exchange Network data flow. This data will become part of the RCRAInfo database and will be available to the public via the Envirofacts data warehouse on the EPA web site at <http://www.epa.gov/enviro/>

4.4 Data Elements

The handler data referred to in this document includes the data elements in the HANDLER module of the RCRAInfo database. These data elements are described in the RCRAInfo XML schema found at <http://www.exchangenetwork.net>

4.5 Standards and Technology

EPA and DEP will exchange data using web services technology, which employs Web Services Description Language (WSDL), Simple Object Access Protocol (SOAP), and eXtensible Markup Language (XML).

4.6 Security

Security will be maintained by each partner to adequately ensure the integrity and accuracy of the data. For the most part, the data exchanged under this agreement is not confidential. The information is approved for public distribution, and will be available on a public Internet web site. A “do not release” flag will be available in both the MA DEP database and in the RCRAInfo database to protect data that is not intended for public release.

4.7 Data Source and Data Quality

MA DEP has an online e-Government system called eDEP. RCRA handlers will enter and certify their data online using the eDEP system at <https://edep.dep.mass.gov/>

EPA and DEP will cooperate to ensure that the data being exchanged is current, accurate and complete. Reconciliation of data duplicates, discrepancies, or other quality issues will be in accordance with the process outlined in the section Dispute Resolution. EPA will also work with DEP to resolve any discrepancies between DEP's RCRA data and data in EPA's cross-programmatic Facility Registry System (FRS).

4.8 Data Timeliness

In most cases, the regulated community will enter RCRA handler data online. DEP will store the data in its database, and make it available for checking by the regulated community within minutes after it is entered. In these cases, the data is available for transmission over the Exchange Network within minutes after it is entered.

In other cases, DEP staff must intervene in the data entry process for quality control of data. In these cases, DEP has a goal of making the data available to the Exchange Network within two weeks.

4.9 Dispute Resolution

If at any time one of the partners finds a problem with data quality or completeness, they should start the resolution procedures.

DEP and EPA data administrators will resolve disputes whenever possible. (Data administrators are those assigned with the overall management of RCRAInfo in his or her agency.) The data administrator will contact his or her counterpart, either by telephone, email, or in writing. If the data administrators cannot resolve the dispute within two weeks, they will bring it to the attention of their immediate supervisors.

5 Period of Agreement

This Agreement becomes effective on the date of signatures by both parties and continues until modified by mutual consent or unless terminated with 60 days written notice by either party. Partners should review this agreement periodically, at least once per year. They should amend or revise it as changing needs, conditions or technology warrant.

6 Legal Framework – Disclaimer

This is a voluntary non-binding agreement between MADEP and EPA regarding the exchange of MA RCRA handler data. This agreement does not fulfill any specific federal reporting requirements and participation does not supersede any data or information management and reporting requirements of any grant, contract, or other agreement.

7 Points of Contact

The following individuals have been identified as points of contacts within each partner agency:

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| DEP Primary Contact | EPA Primary Contact |
| David Biggers Environmental Engineer MA DEP 617.292.5787 David.Biggers@MassMail.State.MA.US | Kathleen Lynch Regional Project Officer, Region I US EPA (617) 918-1618 Lynch.Kathleen@epamail.epa.gov |
| DEP Alternate Contact | EPA Alternate Contact |
| Beth McDonough Data Manager MA DEP 617.574.6895 Beth.McDonough@State.MA.US | Lynn Hanifan Regional Project Officer, Region I US EPA (617) 918-1644 Haniman.Lynn@epamail.epa.gov |

8 Approvals

Massachusetts Department of Environmental Protection

James C. Colman, BWP Assistant Commissioner

Date

US EPA Region I

Marv Rosenstein, RCRA Senior Policy Advisor

Date