

**FY 2010 Data Quality Assurance Review for Michigan
under the
Resource Conservation Recovery Act (RCRA)
January 10, 2011**

Michigan's RCRA data is translated directly from WDS to EPA's RCRA Info database, thus the data in RCRA Info should be a mirror image of WDS. However, it appears that the info provided to the public through Otis and ECHO is further processed by EPA by use of EPA specific queries. Without full knowledge of the data points and logic used by EPA in their queries, it is very difficult to match the information provided in the data verification tool, number for number, for that reason.

Three indications that the data is an accurate reflection of what is in WDS, are; 1) the number of operating TSD's. RCRA Info indicates 19, as does WDS. 2) The number of LQGs. RCRA Info also indicated that there 584 LQG's in RCRA. The number generated by WDS was 583. Since the number of LQG's is a fairly dynamic number that can change from day to day or month to month, the difference between our WDS data and RCRA Info is negligible. 3) The number RCRA sites inspected. RCRA Info indicated that there were 696 RCRA sites inspected in FY 10. The number of RCRA sites inspected in FY10, according to WDS was 696 also. In an effort to further verify data, we drilled further down into the RCRA Info data presented and compared info on specific facilities and found the information to be valid when compared with WDS.

Specific comparisons of RCRA Info data and WDS, along with explanations for discrepancies follow:

Number of Active SQGs 2,636----WDS 2642

The difference could be attributed to the timeframes used for data pulls or changes in the WDS database since EPA performed its query. Otherwise we find this data to be ok.

Number of all other active sites in RCRA Info 16,087-----WDS 15935

The difference could be attributed to the timeframes used for data pulls or updates in the WDS database since EPA performed its query, or a difference in data points and logic used by EPA for its Query. Otherwise, we find this data to be ok.

Number LQGs per latest official biennial report 446-----WDS 434

The difference could be attributed to the timeframes used for data pulls or updates in the WDS database since EPA performed its query.

Compliance monitoring; number of inspections (1FY) 745----WDS 734

The difference could be attributed to the timeframes used for data pulls or updates in the WDS database since EPA performed its query. Otherwise, we find this data to be ok.

Compliance monitoring sites inspected (1FY)696----WDS 696. We find this data to be ok.

Number of sites with violations determined at any time during the FY 646-----WDS 792.

This data reference is not clear and will require further communication with EPA for clarification. However, we believe the difference between RCRA Info data and WDS data may be attributed to data points and data logic used by EPA in constructing the query. We believe that our WDS query may include facility categories that are excluded in the EPA query. We are uncertain about the validity of this data. Further the high number of violations that appear to continue to exist in the database indicates that additional effort needs to be devoted to data clean-up and close out of old violations.

Number of sites with violations determined during FY 339-----WDS 406.

The difference could be attributed to the timeframes used for data pulls or changes in the WDS database since EPA performed its query. Another possibility for the difference between RCRA Info data and WDS data may be attributed to data points and data logic used by EPA in constructing the query. We believe that our WDS query may include facility categories that are excluded in the EPA query. Otherwise, we find this data to be ok.

Informal action: number of sites (1FY) 359-----WDS 408

The discrepancy could be attributed to the timeframes used for the data pulls or changes in the WDS database since EPA performed its query. However, it is most likely due to the difference in data points and data logic used by EPA in constructing the query. We believe that our WDS query may include facility categories that are excluded in the EPA query. Otherwise, we find this data to be ok.

Informal action: number of actions: (1FY) 413-----WDS 419

The difference could be attributed to the timeframes used for data pulls or updates to the WDS database since EPA performed its query. Otherwise, we find this data to be ok.

SNC: number of sites with new SNC (1FY) 0----- WDS Data not yet pulled

While we are working a resolution to the problem ERMD is having difficulty logging tracking verifying and retrieving SNC data due to resource issues. The only person fully trained and familiar with logging and tracking SNC data information transferred to another division and since that time, ERMD has not been successful in finding and training someone within ERMD to take on that responsibility. Efforts are currently being put forth to train district staff to input and track SNC data. Based on a review of hard copy files, this data is not valid. There were at least 2 sites with new SNC in FY10.

SNC: number of sites in SNC (1FY) 16-----WDS Data not yet pulled

While we are working a resolution to the problem ERMD is having difficulty logging tracking verifying SNC data due to resource issues. The only person fully trained and familiar with logging and tracking SNC data information transferred to another division and since that time, ERMD has not been successful in finding and training someone with ERMD to take on that responsibility. Efforts are currently being put forth to train district

staff to input and track SNC data. **Based on a review of hard copy files, we find this to be ok.**

Formal Action: number of sites (1FY) 9----WDS Data not yet pulled.

Based on a review of hard copy files, we find this to be ok.

Formal Action: number taken (1FY) 13-----WDS Data not yet pulled.

Based on a review of hard copy files, we find this to be ok.

Total amount final penalties (1FY) \$50,400---WDS Data not yet pulled.

Based on a review of hard copy files, we find that this not valid. The total amount of final penalties for **FY10 was \$110,790**. The discrepancy could be attributed to possible data translation issues or updates to the WDS database after the EPA data pulled. It is also important to note that some of the penalties collected were from waste haulers that elected not to pursue credentials for waste hauling, or LIW haulers that do not have an EPA ID number.

Number of sites in violation for greater than 240days 196----WDS data not yet pulled

The number of sites in violation for > 240days appears to be high and additional time and effort to research and validate this data is needed. It is expected that the result will be that minor violations exist in the WDS database that have been resolved, but not yet closed out due to resource limitations.

Inspection coverage of operating TSDFs (2FYs)19----WDS 19

We find this data to be ok.

Inspection Coverage for LQGs (1FY)126----WDS 149

The discrepancy may be due to the difference in timeframes used for the data pulls or updates to the WDS data base after the EPA Query. Otherwise we find this data to be ok.

Inspection Coverage for LQGs(5FY) 80% 357----WDS 100% 731.

One hundred percent of LQGs have been inspected every 5 years. We do not find the EPA RCRA Info data to be valid.

Inspection Coverage for active SQG's (5FY) 1051----WDS 1718

The discrepancy may be due to differences in data points and data logic in writing the database queries.

Inspection Coverage at active CESQGs 1034-----WDS 510

The discrepancy may be due to differences in data points and data logic in writing database queries.

Inspections at active transporters (5FYs) 172----WDS 139

The discrepancy may be due to differences in data points and data logic in pulling queries.

Inspections at other active sites (5FYS) 88---No WDS data pulled

Not sure what data points EPA used to generate this data. No opinion on the validity of this data.

Items 7, 8 and 10 and 12, please see information provided above pertaining to resource issues concerning the recording tracking and retrieving SNC and other enforcement data in WDS. Based on hard copy record reviews the data provided appears to be ok. Any discrepancies can be attributed to certain types of penalty data not being translated or picked up in EPA queries.

2010 Enforcement Activity List

With the exception of the penalty amount provided for FY10, the data provided in the 2010 Enforcement Activity List appears to be ok. The correct penalty amount is provided above.

Please let me know if you have questions, or would like additional detail or explanations.

Lonnie C. Lee, MPA, Chief
Field Operations Section
Environmental Resources Management Division
Department of Natural Resources and Environment
Ph: 517-373-4735
Fax: 517-373-4797