



# UIC Program Implementation Inconsistencies Highlighted by Database QA/QC Process

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## Background

- Changes in staffing at the Federal and State levels over the years, combined with a lack of training to incoming staff have led to differences in how programs are interpreting guidance which impacts how they calculate and report on various metrics.
- Since the 7520s presented us with only summary data, these differences/inconsistencies weren't always obvious.
- The well-specific data that is being collected by the national database has provided the UIC Program with the ability to highlight inconsistencies in how data is being tracked/reported.

## Issues summary

- At this time, the QA/QC process has highlighted eight areas related to enforcement/compliance reporting and inventory where we could not reconcile the information contained in the database with that contained on the 7520 and measures reporting.
- As more data is submitted, it is likely that additional areas will be found through the QA/QC process.

## What are the issues?

- How should the total number of enforcement actions be counted?
- Which wells should be on the exceptions list?
  - Is owner/operator information needed in the database report of exceptions?
- When should inspections on converted wells be counted as UIC inspections?
- When should a failed MIT be reported as a violation and when is that violation a SNC?

## What are the issues?

- Should certain wells be excluded from the grant allocation inventory based on authorization/permit status?
- Under what circumstances should proposed wells be included in inventory?
  - How long should a proposed well be considered “active” for inventory purposes?
- Class V subtypes aren’t being identified and reported consistently.

## Data Management Steering Committee

- Group made up of EPA and State database users.
- Support the cooperative efforts of EPA and State agencies in improving and enhancing UIC Program data management.
- Also serves in an advisory capacity to assist EPA's Office of Ground Water and Drinking Water in addressing UIC data management issues.

# Data Management Steering Committee Objectives

- Provide a forum for information exchange and constructive discussions on UIC data management.
- Ensure that the database reduces UIC reporting burden and increases interagency efficiencies.
- Help programs transition to electronic reporting.
- Work with Integrated Project Teams (IPTs) to identify problems/issues.
- Improve understanding by data users about the UIC Program and what the data contained in the database represents (data stewardship).
- Ensure data quality/consistency issues are addressed.

# Data Management Steering Committee Membership

- Kurt Hildebrandt, EPA Region 7 – Federal Co-Chair
- Jim Halvorson, Montana – State Co-Chair
- Bill Bates, EPA Region 5
- Stan Belieu, Nebraska
- Maria Conicelli, EPA Region 3
- Elizabeth Janes, EPA Region 9
- Trang Le, EPA HQ OW (ex-official)
- Cathy McCarty, Florida
- Carl Reeverts, EPA HQ OW
- Tom Ripp, EPA HQ OECA
- Bob Smith, EPA HQ OW
- Nathan Wiser, EPA Region 8

## Trying to bring consistency to an inherently inconsistent program

- The Data Management Steering Committee (DMSC) believes that these issues can be corrected with the development of SOPs.
- The DMSC has prepared a series of seven issue papers that lay out the problems we are seeing, offers some options and recommendations for correcting these problems, and is seeking the input of the program managers and their database coordinators in how to best address them.
- As initial direction is provided from these sources, input from other stakeholders will be solicited.

## Process

- Issue(s) raised to DMSC.
- Subcommittee formed to look at issue(s) and create recommendations.
- Recommendations sent to UIC Regional Branch Chiefs and Database Coordinators for review/comment and direction.
- Recommendations brought back to full DMSC for input.
- If there is agreement amongst the DMSC, recommendations then forwarded to EPA Headquarters for consideration.
- EPA Headquarters determines if recommendations are implemented.

## Issue #7A - Under what circumstances should proposed wells be included in inventory?

- **Current Requirement:** Guidance #42 states that proposed wells “where permit applications have been received and are under review” should be counted in the inventory for funding purposes.
- **QA/QC Issue:** Inventory for grant allocation and reporting counts wells with an authorization status of Active (AC), Temporarily Abandoned (TA) or Under Construction (UC). States may not be reporting proposed wells in their inventory counts.
- **Recommendation:** Proposed wells associated with a permit action (application, application for modification, permit issued, file review, permit withdrawn, permit denied) will be counted toward the fundable inventory.

## Issue #7B - How long should a proposed well be considered “active” for inventory purposes?

- **Current Requirement:** While Guidance #42 states that proposed wells should be counted in the inventory for funding purposes, it does not specify how long a well can remain in the status and still get funding.
- **QA/QC Issue:** Of the 1,300 proposed wells in the National Database, approximately 50 percent have a latest permit activity type and date older than 10 years.
- **Recommendation:** There wasn't general consensus on how long after a permit has been issued that the proposed well(s) could be counted for funding. Some Regions favored five years and others favored 10 years (since the permit life on other than Class II wells is 10 years).

## Caveat emptor

- Implementation of these recommendations may require changes to standard National Database queries and reports, and to the 7520 forms and instructions.
- While the DMSC strived to find the simplest solutions to these problems, it still may require some effort on the part of the data submitters to modify/update the information contained in their systems.

## Caveat venditor

- Programs who have been interpreting guidance in a different way than the recommendations may be reluctant to modify their data.
- We may have to utilize a “from this point forward” approach to the data.



## Questions?

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