Individual Report Data Quality Checks

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On all Forms, check:

- Required fields are filled in (see BR file Spec guide)
- If submitted on paper, is it legible for data entry personnel
- Whether the various codes used are valid

Site ID form

- ID is valid
- See if you can use RCRAInfo Handler data if any of the owner/operator info is blank (or request data from submitter)
- Compare gen status against GM forms
- Waste codes are now required if site is a generator
- If they check the TSD box, verify against the Operating TSD Universe indicator in Handler Detail
- If clues indicate the site was a short-term generator and the event is over, verify whether current gen status (10.A.1) is correct
- LQHUW if they mark this Yes it's likely to be an error

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GM Form – Section 1, Form Code, Source Code and G25

- Density and density UOM must be provided for volumetric quantities (G, L, Y).
 Otherwise optional but recommended.
- Is density within a reasonable range for the density UOM?
- WM code is required. X (no new efforts) is the default. An answer of Y or N
 requires a comment.
- Form Code should be W309 if the waste is batteries
- If Form Code = Woo4 then must have at least one acute waste code. Opposite is true for Woo1.
- Source Code should be G11 for off-spec or out-of-date waste
- If Source Code = G61 then quantity generated should be o because it was transferred waste
- If source code = G25 must provide mmc.
- If source code not equal G25 should not have mmc.
- If reporting still bottoms from recycling, did they check Recycler of HW on the Site ID form?
- G25/H141 is illogical

GM Form - Section 2

- If on-site = Yes, is the mgmt required to be reported because:
 - It is a process that requires a permit (check RCRAInfo unit info)
 - The waste is accumulated on-site prior to mgmt in an exempt unit (will have to contact the site to find out details)
 - The method is underground injection
- If none of these apply, it's very likely it should not be reported (neutralization, Exempt WW mgmt)
- Is the mgmt method the correct one for this process?
- If two systems are reported, are the quantities identical? If so it is likely the info is not reported correctly.

GM Form - Section 3

- Verify that "Ship off-site" is correct.
- Verify that the EPA ID is valid, is a HW receiver (and not a transporter only), and that the mmc is a method this facility conducts.
- Compare the shipment quantity to gen quantity. If looks odd, different UOMs may have been used. Generally the quantities are similar.
- If waste was shipped to an in-state TSD that submits WRs, cross-check and contact generator and/or TSD if there are significant discrepancies.
- Receiver on GM should be listed on OI, if using form OI
- Page number should be unique

WR Form

- If the customer's ID appears to be a permanent one, is it valid and does it start with a state code?
- Is the management method code (mmc) one that this facility conducts?
- Form Code lab pack check (same as GM)
- Page number should be unique
- Received qty cannot be o
- Receiver should not list self as a customer
- Optional: verify whether in-state CESQG customers with "dummy" IDs actually have permanent IDs

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OI Form

- If waste was shipped off-site and your state requires it, was the OI Form included?
- Are all receivers on at least one GM Form?
- Are receivers who are not transporters marked as such?
- Are all receiver and transporter IDs valid?
- Is at least one transporter included?
- Are all IDs marked as Generators listed as such on a WR Form?
- Are addresses provided for all handlers except those which are only transporters?
- Cross-out duplicate ID entries and consolidate Handler type info.
- OI data should not be uploaded in the BR files

TSD Report checks

- Does the sum of GM Form G61 shipments reasonably correspond with the sum of WR Form H141 records?
- Does the sum of GM Form fuel blended waste shipments reasonably correspond with WR Form Ho61 totals? In Ohio they are coded on GM as G25/Ho61. (Exempt used oil may be included in error.)
- Are there Source Code G25 GM Forms with residuals for the management methods the TSD conducts? Examples:
 - · Landfill leachate
 - · Incinerator ash
 - Still bottoms (which may have been fuel blended on-site)
 - Fuel blended waste shipped for energy recovery

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FC Handlers

- Foreign Country handlers are identified by a statedefined ID beginning with "FC".
- However, some have been IDs assigned by implementers that begin with a state code.
- If a state includes these in their data (it's optional), they should be identified with "FC"

Include in National Report Flag

- If site was a LQG or permitted TSD during the report year, Site ID Include flag should be Yes. How you determine that is up to you but the new field in Reason for Submittal should help.
- If Site ID Include flag = N, all GM / WR flags must = N
- If a waste should be reported under federal requirements, the GM and/or WR Include flag should be Y(Yes).
- For forms reporting state-specific waste only, Include flag should be No.

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Post data-entry checking

- Check facility quantities against previous cycle year data for major outliers
- Check shipped vs. received quantities nationally and inside the State
- Circulate summary reports to Districts / Inspectors / permitters to verify or point out omissions