

PRIVACY IMPACT ASSESSMENT

(Rev. 2/2020)

(All Previous Editions Obsolete)

Please submit your responses to your Liaison Privacy Official. *All entries must be Times New Roman, 12pt, and start on the next line.* If you need further assistance, contact your LPO. A listing of the LPOs can be found here:

https://usepa.sharepoint.com/:w:/r/sites/oei_Community/OISP/Privacy/LPODoc/LPO%20Roster.docx

System Name: Tar Creek Off-Site Rule and Chat Tracking Database	
Preparer: Marcus Caruthers/Casey Lockett	Office: EPA Region 6
Date: 1/14/2021	Phone: 214-665-7393
Reason for Submittal: New PIA <input checked="" type="checkbox"/> Revised PIA <input type="checkbox"/> Annual Review <input type="checkbox"/> Rescindment <input type="checkbox"/>	
This system is in the following life cycle stage(s):	
Definition <input checked="" type="checkbox"/> Development/Acquisition <input checked="" type="checkbox"/> Implementation <input checked="" type="checkbox"/>	
Operation & Maintenance <input checked="" type="checkbox"/> Rescindment/Decommissioned <input type="checkbox"/>	
Note: New and Existing Systems require a PIA annually, when there is a significant modification to the system or where privacy risk has increased to the system. For examples of significant modifications, see <u>OMB Circular A-130, Appendix 1, Section (c) (1) (a-f).</u>	
The PIA must describe the risk associated with that action. For assistance in applying privacy risk see <u>OMB Circular No. A-123, Section VII (A) (pgs. 44-45).</u>	

Provide a general description/overview and purpose of the system:

External user interface application which will collect information from external parties that will be routed to multiple EPA Regions for action. Database will track compliance with EPA’s Chat Rule and Off-Site Rule. This application will need to store data and supporting routing approvals.

Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or Executive Order(s) permit and define the collection of information by the system in question?

42 U.S. Code CHAPTER 103—COMPREHENSIVE ENVIRONMENTAL RESPONSE,

COMPENSATION, AND LIABILITY

CERCLA Section 104§(e)(2). Information collection from individuals will be a limited and will not equal or exceed 10 persons. This is the Section in the Superfund law that allows for the Agency to collect information regarding EPA Superfund response actions. No legal authority is directly applicable to the information collection by the Tar Creek application however, CERCLA 104(e)(2) authorizes the Agency to collect information with regards to Superfund response actions.

1.2 Has a system security plan been completed for the information system(s) supporting the system? Does the system have or will the system be issued an Authorization-to-Operate? When does the ATO expire?

No. ATO will be completed and submitted by R6. No ATO expiration date known.

1.3 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

No IRC required.

1.4 Will the data be maintained or stored in a Cloud? If so, is the Cloud Service Provider (CSP) FedRamp approved? What type of service (PaaS, IaaS, SaaS, etc.) will the CSP provide?

The data will not be maintained or stored in a Cloud. It will be stored in an on premise database.

Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

2.1 Identify the information the system collects, uses, disseminates, or maintains (e.g., data elements, including name, address, DOB, SSN).

External client information collected:

Chat processor and email; chat purchaser company name, company address, contact name, phone, email; date of expected chat transfer; type and volume of chat ordered; indicate whether chat sale is bulk or bag sale; chat delivery location and job location contact and phone; permit #s and comment field

Track internal entries of chat sales – chat type and volume, specific use, buyer and buyer contact information, destination/end use location, end user if different from buyer

Track Off-Site Rule acceptability determinations entered by EPA

2.2 What are the sources of the information and how is the information collected for the system?

EPA employees and external companies will be the sources of information. It will be collected via external interface as well as EPA data entry from forms submitted by external companies. Information will not be collected from more than 10 individuals.

2.3 Does the system use information from commercial sources or publicly available data? If so, explain why and how this information is used.

No

2.4 Discuss how accuracy of the data is ensured.

Data will be protected in an Oracle database with industry standards, security, data integrity under the NCC infrastructure. App

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Discuss the privacy risks identified for the specific data elements and for each risk explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.

Privacy Risk:

Privacy risk - divulging proprietary company information. External users are business competitors and should never have access to other companies' entries or data

Mitigation:

Controls are embedded in the system to prevent risk.

Section 3.0 Access and Data Retention by the System

The following questions are intended to outline the access controls for the system and how long the system retains the information after the initial collection.

3.1 Do the systems have access control levels within the system to prevent authorized users from accessing information they don't have a need to know? If so, what control levels have been put in place? If no controls are in place why have they been omitted?

Yes it will. Three levels access – (1) external user will have entry level information; (2) designated EPA regional personnel; (3) Admin level access to all data for manipulation

3.2 In what policy/procedure are the access controls identified in 3.1,

documented?

Security, including access, is provided by Web Access Management (WAM).

3.3 Are there other components with assigned roles and responsibilities within the system?

None

3.4 Who (internal and external parties) will have access to the data/information in the system? If contractors, are the appropriate Federal Acquisition Regulation (FAR) clauses included in the contract?

External/regulated companies and Internal/EPA employees. No contractors.

3.5 Explain how long and for what reasons the information is retained. Does the system have an EPA Records Control Schedule? If so, provide the schedule number.

EPA Record Schedule 0089.

Information will be retained for a minimum of 5 years to track facilities that have submitted and been approved to receive hazardous waste per EPA's Off-Site Rule.

3.6 Privacy Impact Analysis: Related to Retention

Discuss the risks associated with the length of time data is retained. How were those risks mitigated? The schedule should align the stated purpose and mission of the system.

Privacy Risk:

PII data could be retained longer than schedule required

Mitigation:

User will delete out-of-date information.

Section 4.0 Information Sharing

The following questions are intended to describe the scope of the system information sharing external to the Agency. External sharing encompasses sharing with other federal, state and local government, and third-party private sector entities.

4.1 Is information shared outside of EPA as part of the normal agency operations? If so, identify the organization(s), how the information is accessed and how it is to be used, and any agreements that apply.

Each external company will only receive information relative to their business operations (chat sales). There will be no exchange of/ sharing of information.

Two external companies – Williams Diversified Materials and Flint Rock Products

4.2 Describe how the external sharing is compatible with the original purposes of the collection.

External sharing of information will be limited to providing information to external parties regarding their acceptability to receive waste (chat) under EPA’s Off-Site Rule. The purpose of the collection of information is for EPA to use the information to make acceptability determinations for the transfer of hazardous waste to the receiving facilities (external parties).

4.3 How does the system review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within EPA and outside?

NA

4.4 Does the agreement place limitations on re-dissemination?

NA

4.5 Privacy Impact Analysis: Related to Information Sharing

Discuss the privacy risks associated with the sharing of information outside of the agency. How were those risks mitigated?

Privacy Risk:

There will be no risk to information sharing since no information is shared outside the Agency.

Mitigation:

None

Section 5.0 Auditing and Accountability

The following questions are intended to describe technical and policy-based safeguards and security measures.

5.1 How does the system ensure that the information is used as stated in Section 6.1?

Administrator will conduct quality checks to ensure that data is used for the purpose for which it was collected.

5.2 Describe what privacy training is provided to users either generally or specifically relevant to the system/collection.

None for external users. Annual Information Security and Privacy Awareness Training (ISPAT)

required for EPA users.

5.3 Privacy Impact Analysis: Related to Auditing and Accountability

No privacy impact is expected because access is limited as described above.

Privacy Risk:

Untimely Audit lead to a loss of integrity of data

Mitigation:

Internal Audit conducted in a timely re-occurring schedule.

Section 6.0 Uses of the Information

The following questions require a clear description of the system's use of information.

6.1 Describe how and why the system uses the information.

The purpose of the collection of information is for EPA to use the information to make acceptability determinations for the transfer of hazardous waste to the receiving facilities (external parties). EPA is required to make these acceptability determinations under the Off-Site Rule

6.2 How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? Yes___ No X.

Information is retrieve using company's name.

6.3 What type of evaluation has been conducted on the probable or potential effect of the privacy of individuals whose information is maintained in the system of records?

Admin controls, Approved Authentication and Authorization methodologies in place

6.4 Privacy Impact Analysis: Related to the Uses of Information

Describe any types of controls that may be in place to ensure that information is handled in accordance with the uses described above.

Privacy Risk:

Improper use of data from all users

Mitigation:

Log in is recorded and tracked. All records [created by], [created date], [modified by] and [modified date].

***If no SORN is required, STOP HERE.**

The NPP will determine if a SORN is required. If so, additional sections will be required.

Section 7.0 Notice

The following questions seek information about the system's notice to the individual about the information collected, the right to consent to uses of information, and the right to decline to provide information.

7.1 How does the system provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

7.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the collection or sharing of their information?

7.3 Privacy Impact Analysis: Related to Notice

Discuss how the notice provided corresponds to the purpose of the project and the stated uses. Discuss how the notice given for the initial collection is consistent with the stated use(s) of the information. Describe how the project has mitigated the risks associated with potentially insufficient notice and opportunity to decline or consent.

Privacy Risk:

Mitigation:

Section 8.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

8.1 What are the procedures that allow individuals to access their information?

8.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

8.3 Privacy Impact Analysis: Related to Redress

Discuss what, if any, redress program the project provides beyond the access and correction afforded under the Privacy Act and FOIA.

Privacy Risk:

Mitigation: