



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

<b>System Name:</b>  Tribal Underground Storage Tanks Database (TrUSTD)	<b>System Owner:</b>  Susan Burnell
<b>Preparer:</b>  Susan Burnell	<b>Office:</b>  OLEM/Office of Underground Storage Tanks
<b>Date:</b>  5-24-21	<b>Phone:</b>  202-564-0766
<b>Reason for Submittal:</b> New PIA ____ Revised PIA ____ Annual Review <u>X</u> Rescindment ____	
<b>This system is in the following life cycle stage(s):</b>	
Definition <input type="checkbox"/> Development/Acquisition <input checked="" type="checkbox"/> Implementation <input type="checkbox"/>	
Operation & Maintenance <input checked="" type="checkbox"/> Rescindment/Decommissioned <input type="checkbox"/>	
<b>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></b>	
<b>The PIA must describe the risk associated with that action. For assistance in applying privacy risk see <u><a href="#">OMB Circular No. A-123, Section VII (A) (pgs. 44-45).</a></u></b>	

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

To assist with its implementation responsibilities, EPA’s Office of Underground Storage Tanks (OUST) has created the Tribal Underground Storage Tanks Database (TrUSTD), a national Oracle

APEX application and database, to store and manage compliance, enforcement, and cleanup information on UST facilities located within IC. EPA regions that have UST facilities within IC will: collect, manage, and maintain information; input data; and, scan and upload documents into the database. The regional UST program offices will use their region-specific data to assist staff and managers in performing their implementation responsibilities. OUST can access the regional information to generate reports that can be downloaded in .csv format for internal use, to respond to FOIA requests, and to share information with ORD's public facing UST Finder database on the Agency's Geoplatform.

## **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?**

EPA is the regulatory implementer of the UST program in Indian country (IC) as mandated by Subtitle I of the Solid Waste Disposal Act (1984), the Superfund Amendments Reauthorization Act (1986), and the Energy Policy Act of 2005 [42 USC 6991 and 6991(l)].

### **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?**

TrUSTD is hosted at the National Computer Center (NCC) and security falls under the Application Deployment Checklist (ADC) process, which covers systems hosted under General System Support at NCC. The system has undergone an application security review and certification under the ADC process which expires November 2021.

### **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.**

The information collected is covered by the PRA as part of OUST's programmatic ICR. Information Collection Request for Underground Storage Tanks: Technical and Financial Requirements, and State Program Approval Procedures, EPA No. 1360.17, OMB No. 2050-0068.

### **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?**

No. The data will be maintained on a server (EPAp12) hosted by the National Computer Center.

## **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).**

Land owner, facility owner and operator name; business name; business address; business phone number; tribal information; facility latitude and longitude; facility information, including facility address; underground storage tank (UST) information including tank and compartment information, products stored and compatibility, repairs, installations, removals; inspection information; compliance and compliance assistance information; financial assurance information; enforcement information; cleanup information; cleanup contract information, workplans, EPA costs, EPA invoices; communications between EPA and the owner, operator, or tribal government.

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

EPA will obtain paper or electronic information (as listed in the data elements above) from UST owners or operators or from parties who are responsible for UST cleanups. EPA personnel will input information into the system data fields or scan and upload the information as pdf documents.

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

Yes. There is a minor feature that display coordinates from BingMaps to verify site location. TrUSTD also uses the TRIBES webserver to pull the official tribal names into the database, as directed by OEI.

### **2.4 Discuss how accuracy of the data is ensured.**

To ensure accountability and accuracy, data entry is automatically stamped with the date and who entered data. This information also helps inform users about the data and time relevance. There are checks within the database for some key data entry areas (such as

creation of new land locations and associated facilities, USTs, owners, and operators; inspection information; compliance and compliance assistance information) that prompt users to review the accuracy and completeness of data before finishing.

## **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:**

Some data elements stored in the database are PII. The privacy risk is inherent to the information being collected.

### **Mitigation:**

Only EPA employees who directly implement or oversee the UST program in Indian Country will be granted access to the system by the database administrators (who are also EPA employees). In addition, there is a marker that users can use to flag PII data as “confidential” in the database to inform other users when information is PII.

## **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?**

The system is accessible only within the EPA network by EPA employees who are authorized to access it. The system is configured with Web Access Management (WAM) so users would use the single sign-on process using their LAN username and password. A user is granted one of three access levels: Admin (can edit/delete information at any time); Regular (can edit/delete information within 7 days of adding it); or, Read-only (cannot add/edit/delete information). Access control are role base. Database administrators will only grant access to EPA employees that work on UST program implementation in Indian Country.

### **3.2 In what policy/procedure are the access controls identified in 3.1, documented?**

Access roles are documented in the current User Guide. The database administrator(s) for each EPA region assigns roles based on the EPA's employees' roles, duties and responsibilities. Admin users are limited to a select few (e.g., OUST application lead, the regional EPA employee that will maintain the database and/or UST program managers in the management chain - regional program managers, branch chiefs, etc). Regular user access is

for those EPA employees that implement the UST program in Indian Country and need the ability to read/write the information. Read-only access is for those EPA employees that just need to view the data and do not work in the UST program on a regular/daily basis (e.g., headquarters staff, regional counsel office).

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

No

**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?**

Only EPA employees who directly implement or oversee the UST program in Indian Country will have access to this system. Contractors working on the 508 accessibility requirements are managed through GSS at NCC and have all required clauses.

**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.**

The information will be retained indefinitely within the database. EPA is the regulatory implementer of the UST program in Indian country (IC) as mandated by Subtitle I of the Solid Waste Disposal Act (1984), the Superfund Amendments Reauthorization Act (1986), and the Energy Policy Act of 2005. To assist with its implementation responsibilities, EPA's Office of Underground Storage Tanks (OUST) has created the Tribal Underground Storage Tanks Database (TrUSTD), a national Oracle APEX application and database, to store and manage compliance, enforcement, and cleanup information on UST facilities located within IC. EPA regions that have UST facilities within IC will: collect, manage, and maintain information; input data; and, scan and upload documents into the database. The regional UST program offices will use their region-specific data to assist staff and managers in performing their implementation responsibilities. OUST can access the regional information to generate reports that can be downloaded in .csv format for internal use or to respond to FOIA requests.

Record schedules 008; 1016; 1035; 1044 apply to the records within this database. The application schedule is 0090.

**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:**

Some data elements stored in the database are PII. The information will be retained indefinitely within the database. The privacy risk is inherent to the information being collected.

**Mitigation:**

Only EPA employees who directly implement or oversee the UST program in Indian Country will be granted access to the system by the database administrators (who are also EPA employees). The data is stored on a server at the National Computer Center (NCC). NCC does regular backups of their servers as part of its routine operations.

## **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.**

No

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

N/A

**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?**

N/A

**4.4 Does the agreement place limitations on re-dissemination?**

N/A

**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:**

N/A

**Mitigation:**

N/A

## **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?**

There is nothing in the system that explicitly and affirmatively states that the EPA employees using the database will only use it for the purposes described in the PIA (e.g., a window that pops up stating that the by clicking OK, the user agrees to use the database for the sole purpose of implementing or overseeing the UST program in Indian Country). However, only EPA employees who directly implement or are involved in the UST program in Indian Country will be granted access to the system by the database administrators (who are also EPA employees). Data entry is automatically stamped with the date and user name so we know who and when information was entered or edited.

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

EPA employees are required to take annual information security and Privacy Awareness training and records management training which would apply to their use and handling of this information.

### **5.3 Privacy Impact Analysis: Related to Auditing and Accountability**

**Privacy Risk:**

Some data elements stored in the database are PII. The privacy risk is inherent to the information being collected. EPA employees might use the information in ways not stated in this PIA.

**Mitigation:**

Only EPA employees who directly implement or are involved in the UST program in Indian Country will be granted access to the system by the database administrators (who are also EPA employees). To access the system, all users need to use the single sign-on process using their LAN username and password. Data entry is automatically stamped with the date and user name so that users know who and when information was entered or edited.

## **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 Agency will use data to assist staff and managers in performing their direct implementation responsibilities for the UST program in IC as described in the purpose. The primary purposes for EPA's Tribal Underground Storage Tanks Database (TrUSTD) are to:

- Improve database functions and data management for the regions to do their direct implementation work
- Have sufficient and accurate data that has been vetted and verified by regions
- Be able to perform cross-region and national UST program analysis more efficiently
- Have easier access to and store consistent data
- Be a cost effective, internal EPA, program management tool which incurs less out-of-pocket costs
- Create a platform that will enable easier sharing of data with the public

## **6.2 How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? Yes \_\_\_ No x. If yes, what identifier(s) will be used. (A personal identifier is a name, social security number or other identifying symbol assigned to an individual, i.e. any identifier unique to an individual. Or any identifier that can be linked or is linkable to an individual.)**

Site information is primarily organized and retrieved by Land Location ID, which is a unique site code assigned by EPA to identify a land location.

## **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?**

We have not conducted a privacy analysis separate from this exercise. However, privacy of records in TrUSTD is inherent in the design of the application. Only EPA staff who are involved in the management of the Underground Storage Tank program are granted access to the application. In addition, regional staff only see the data applicable to their region.

## **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:**

Some data elements stored in the database are PII. The information will be retained indefinitely within the database. The privacy risk is inherent to the information being collected.

### **Mitigation:**

Only EPA employees who directly implement or oversee the UST program in Indian Country will be granted access to the system by the database administrators (who are also EPA employees).



**\*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:**