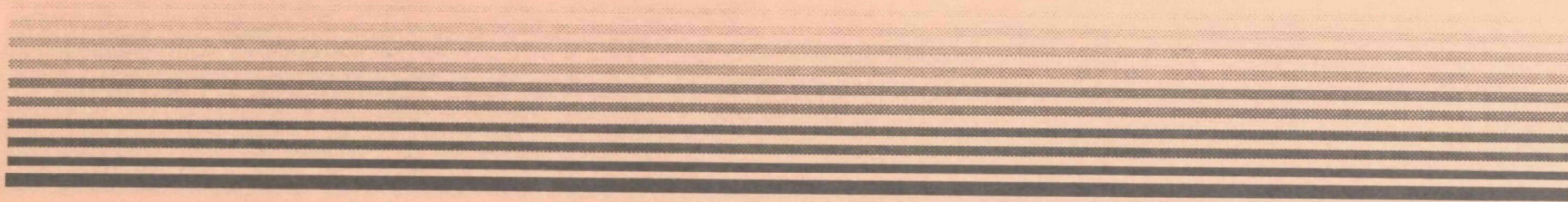
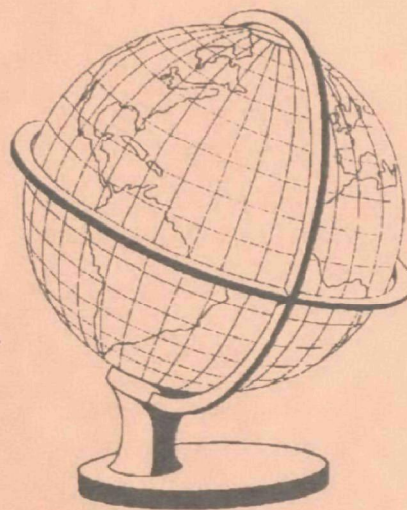


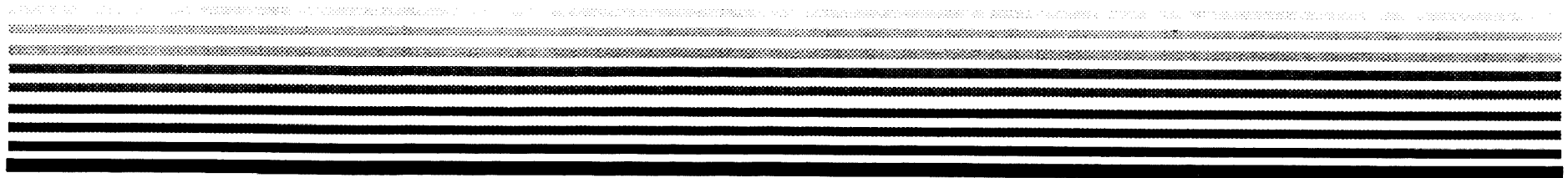
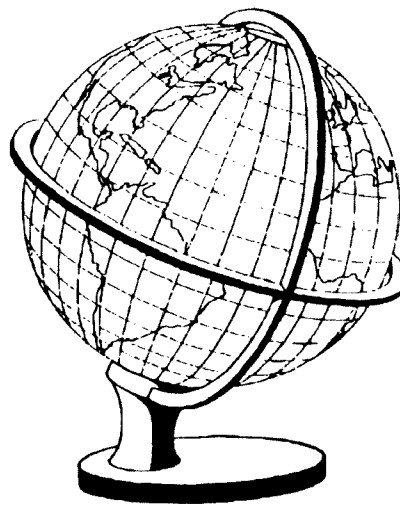
LOCATIONAL DATA POLICY IMPLEMENTATION GUIDANCE

Comments Summary



LOCATIONAL DATA POLICY IMPLEMENTATION GUIDANCE

Comments Summary



LDPG ISSUES -- COMMENTS SUMMARY

RESOURCES

Types of Comments	Specific Comments	Commentors	Resolution
Funding is needed for GPS acquisition, training; also a need for trained people	"...For the Regions and the States to substantially upgrade locational accuracy, funds will need to be budgeted to purchase global positioning equipment and training..."	R8	GPS Primer accompanies LDPG. Funding and arrangements for training (available from a number of sources) must come from programs; OIRM has limited funds which may be applied such as SEDM financial assistance grants. Regional GIS Work Group member may be helpful in identifying sources of equipment and training in each region.
	"I have some concern that the funding for these responsibilities will not be in place by the time the final document hits the streets..."	R7	
	"We have concerns about the timing for identifying GPS as the preferred technology. The final [LDPG] could precede funding [and] a procurement vehicle..."	R7	
	"...Specify the responsibility of EPA Programs implementing this policy in providing sufficient training for state delegates and the necessary technical resources to carry out the EPA requirements i.e., ...GPS units, etc."	OR	
	"OIRM should provide regional contractors dedicated to collection of [location identification] data in support of program offices..."	OTS	
	"... EPA [may need to have access to] a set of approved GPS professionals, perhaps similar to the asbestos removal specialists, to which industry should refer in obtaining data using GPS..."	OTS	

LDPG ISSUES -- COMMENTS SUMMARY

RESOURCES (continued)

Types of Comments	Specific Comments	Commentors	Resolution
FINDS enhancements (retooling and address matching): resources must be committed, identified in LDPG	<p>"The FINDS system needs increased funding so as to upgrade the locational accuracy components of that critical data base."</p> <p>"[FINDS management is not in the process of populating lat/long data elements in FINDS facility records] until...funding issues [are resolved]..."</p>	<p>R8</p> <p>OIRM/PSD</p>	Clarified Sec. 5.1.8 (Role of FINDS) to indicate that OIRM is working to populate lat/longs in FINDS
Ability of EMSL-LV to support everyone's need for technological support for GPS, and source of resources: needs to be developed	<p>"Throughout the [draft LDPG] there is...reference made to the role of EMSL-LV...The incorporation of a GPS research and tech support mission is a natural evolution to our current GIS mission...However, without the identification of necessary funding to support a GPS program we will be constrained in our efforts to fulfill our role."</p> <p>"There is a considerable commitment for Las Vegas to support this policy. Will resources be provided by OIRM or ORD?"</p>	<p>EMSL-LV</p> <p>EMSL-LV</p>	Revised role of EMSL-LV as primarily research in Sec. 4.3.1.1.
Funding will be needed for system reconfiguration	"...Because of [having to meet other requirements...we may] not have the resources for reconfiguring existing data bases, especially along the line described in Chapter 5 of the LDP Guidance."	MN	Amount, source of funding for system reconfiguration, and impact on states to be addressed in Program Implementation Plans. Use of SEDM grants also a possibility.
LATF discussion of some incentives is inappropriate for widespread distribution; caveats must precede them or they should be deleted from LDPG	"...Revise the financial incentive sections on pages 3-5, A-25, and A-26 (Chapter 3 and Appendix A)...There are several incentives which...are not [necessary] for a widely distributed document."	Assoc. Comptroller	Shortened discussion of financial incentives in Chapter 3; said need for data is a powerful incentive, and partnership is encouraged; left appendix, summarizing LATF, intact.

LDPG ISSUES -- COMMENTS SUMMARY

RESOURCES (continued)

Types of Comments	Specific Comments	Commentors	Resolution
SEDM grants made available for LDPG implementation by states will decrease the availability of those grant monies for other uses	"Incentives for locational accuracy seem to target SEDM Grants in many forms (See section A - 24). While this is not for a bad cause, it does take away from other SEDM objectives such as basic communications."	OIRM/SEDM	Revised responsibility section describing IMSD/SEDM role to show SEDM as facilitator of and not sole motivator for states, and that support should come from programs and states, as well as SEDM.
Procurement vehicle for GPS needs to be put in place, identified for users	<p>"The procurement of multiple GPS units will require an agency procurement contract. Equipment specifications, procurement negotiations and vendor bids should begin immediately to permit regional end-of-year purchases."</p> <p>"GPS is the preferred technology but... we (EPA) do not have a GPS procurement in place."</p> <p>"The guidance needs to state which office(s) is responsible for obtaining a vehicle for use of this technology (GPS) to obtain lat/long(s)."</p>	<p>R9</p> <p>R7</p> <p>OWEP</p>	Explained that support may be available from within in each region.
Programs requests OIRM funding for FY 92 or FY 93 cycle to implement the LDPG	<p>"We request that OIRM provide...FY'92...funding [approximately \$200K of additional FY 92 funds] as needed to support the LDP requirements. If for some reason OIRM funding assistance for FY '92 is not available, we would plan to request FY '93 funds through the normal budget schedule."</p> <p>..."The [LDPG implies that the] burden of reporting (at least in part) [is upon] EPA or [the] state [and not on] the regulated entity which has historically provided most of the locational data during reporting...OIRM and OPPE should seek...funding in FY93-96 budgets...There should be incentives for compliance by the regulated community [in addition to EPA and states]..."</p>	<p>OAQPS</p> <p>OTS</p>	OIRM plans to use a limited amount of FY92-3 funds toward assisting in LDP implementation.

LDPG ISSUES -- COMMENTS SUMMARY

STATE ROLE

Types of Comments	Specific Comments	Commentors	Resolution
Current state practices for collecting/documenting location identification data may need revision to comply with the LDP	"Most states work in UTM or state plane coordinate systems... The states are not going to change this practice because of the LDP. This will be viewed as an additional burden. [However], GCTP has been implemented within ARC/INFO allowing conversion between coordinate systems...They (states) [may] only convert...to comply with EPA mandates."	EMSL-LV	The roles and responsibilities of states under the LDP will be defined in individual program LDP implementation plans, maybe on a state-by-state basis if necessary. Explanation of available conversion software was expanded as to be of possible value to states.
Have a more comprehensive section on state responsibility	"The one half page under State Delegates is at best, cursory, in addressing [the ability of states to carry out implementation of the LDP]. Although issues are considered throughout the document, it seems that specific considerations as to EPA/State expectations should appear here."	OR	Substantially enhanced state responsibility section.
State comments should be solicited on LDPG	"For future drafts, you might consider allowing sufficient lead time for us to obtain the states' views on this implementation guidance."	R9	Regions are invited to circulate LDPG to states.
Strengthen media program office responsibility to motivate states (including providing resources), with OIRM/IMSD's Information Sharing Branch (ISB) as facilitator, networker, not instigator	"There should be some specific language regarding the EPA Programs responsibility in implementing this policy as it relates to the States." "...Program Offices have primary responsibility for assuring State compliance, not ISB [the SEDM program managers]. SEDM is a facilitator/networker coordinator..."	OR OIRM/SEDM	Clarified responsibilities of SEDM, media programs and states as recommended.
Emphasize importance of State cooperation.	"...70% of EPA data is gathered by states..."	OIRM/PSD/GIS	Augmented importance of state buy-in (Sec. 4.4, "State Delegates") as well as Sec. 4.3.2 (that media programs must ensure their delegated states comply).

LDPG ISSUES -- COMMENTS SUMMARY

SCHEDULE

Types of Comments	Specific Comments	Commentors	Resolution
Shorten time for system redesign and retooling	"Many regional media programs will begin collecting locational data as soon as the GPS technology is available. The planned timing for 'System Redesign' and 'Tooling' could possibly be shortened to accommodate this new data."	R9	Time flexibility is necessary for complexity of system redesign efforts. No change made to original schedule.
Give states more time to convert existing data	"...It is important that EPA allows a degree of flexibility in the adoption of the locational data policy. In particular, the schedule for converting and replacing locational data seems ambitious*."	MN	Waivers to schedule can be addressed in each Program LDP Implementation Plan. Re-worded Sec. 6.1 opening paragraph to clarify expectations.
Plan for replacement of location identification data that already exists to approach 25m accuracy goal (p. 2-3)	<p>"...Replace locational data during future site visits for those entities that are visited regularly. A schedule for compliance could be imposed for only those entities that are not regularly visited."</p> <p>"...Initial emphasis should focus on computerizing data EPA has already collected or required the regulated community to collect, and verify its accuracy... This will provide a set of targeted facilities for improvement. In most cases, these "historical" facilities...provide the most information for cross-media spatial analyses..."</p>	<p>MN</p> <p>OTS</p>	Section 7 defines "incremental" data collection (the phrase used in the <i>Guidance to Selecting Latitude/Longitude Collection Methods</i>) to use various routine opportunities to collect/improve data (also referred to in Sec. 2.1.3 footnote).
Define schedule for replacing "old" data with "new"	"...What is to be the policy for waivers regarding regularly updated sets of data...? Should we assume that in some near-term future year, all these entities should be counted as "new" and subsequent reports will be considered "old?"	OTS	The Agency goal is to have all existing location identification data have better than 25m accuracy by 1995. The replacement of existing locational data (either centrally or incrementally) will depend on each program's internal schedule for replacing data, and must be defined in their implementation plans.

LDPG ISSUES -- COMMENTS SUMMARY

SCHEDULE (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Schedule conversion to GPS so that it doesn't precede available money, training, etc.	<p>"The MPCA encourages EPA to develop and implement technical support to provide equipment and training in GPS applications and we suggest EPA provide this support before requiring states to commit to the GPS technology."</p> <p>"The final document could precede funding, a procurement vehicle, identification of Quality Assurance/Quality Control methods, compatibility between vendors, or having a working GPS in any of the regions."</p>	<p>MN</p> <p>R7</p>	No change to original guidance; GPS use will be a phased effort with plans developed first in order to set an agenda for use of GPS; must start with whatever resources are available
Explain why 6/92 was chosen for GIS	<p>"Explain why June 1992 was selected as the date for the Agency moving to widespread use of GPS for collecting new lat/longs."</p> <p>"...Why the June 92 reference] earlier (opening of Ch. 3 vs. Sec. 2.2.4, paragraph 1)?"</p>	<p>EMSL-LV</p> <p>OIRM/PSD/GIS</p>	The LATF recommended that the transition to 25m accuracy and wide-scale use of GPS begin in 1992, when all the necessary satellites are in orbit, and that the transition be completed, and full implementation be started in 1995. Expanded explanation in Sec. 2.2.4 to describe the planned full deployment of satellites.
Coordinate document date of Program Implementation Plans (10/91) with release of GPS Guidance (12/91)	"The...guidance for use of ...GPS technology will not be available until December 1991. This [guidance] should be available to program offices to complete the implementation plans which are due by the end of FY [91]. The time frame for completion of these two events should be re-examined."	OWEP	GPS Primer completed and accompanies LDPG. Due dates for Program LDP Implementation Plans revised (see below).
Need more time to do Program Implementation Plans	"...End of FY 1991 may be ambitious."	OIRM/SEDM	Dates were realigned with presumed beginning in 1992, required completion by December 1993.

LDPG ISSUES -- COMMENTS SUMMARY

SCHEDULE (continued)

Types of Comments	Specific Comments	Commentors	Resolution
<p>Realign dates to reflect current circumstances</p>	<p>(See Exhibit 5-1 for necessary date changes); for example: move FINDS decision from March 91 to September 91; change completion of geocoding methods analysis from March 91 to November 91; change final LDP implementation guidance from March 91 to November 91; Completion of IRM Steering Committee Review of program plans from March 92 to August 92; change completion of data collection for Priority I systems from September 92 to September 93; change completion of data collection for Priority II systems from November 93 to July 94; change completion of data collection for Priority III systems from March 95 to September 95. (Also referring to Sec. 6.2)</p>	<p>OIRM/PSD/GIS</p>	<p>Realigned dates as necessary (but not exactly as suggested in comment). For example:</p> <ul style="list-style-type: none"> • Add-mat to FINDS from 3/91 to 6/92 • Completion of <i>Guidance to Selecting Latitude/Longitude Collection Methods</i> from 3/91 to 12/91 • Final LDPG from 3/91 to 1/92 • IRM Steering Committee review of Program LDP Impl. Plans from 3/92 to 9/92 • Data in Priority III systems from 3/95 to 12/95 <p>Also, removed Geocoding Study (Appendix D) because its successor, the <i>Guidance to Selecting Latitude/Longitude Collection Methods</i>, accompanies this LDPG.</p>

LDPG ISSUES -- COMMENTS SUMMARY

MISCELLANEOUS

Types of Comments	Specific Comments	Commentors	Resolution
User documentation could cover method, description instead of recording them in program data bases	"If the coordinates were obtained using the same method, a statement in the documentation under the latitude/longitude data elements should suffice, thus eliminating resources for modification of the data base, data entry, and data storage."	OWEP	Documentation not likely to be readily available to everyone accessing a data base. Guidance remains unchanged.
25 meter accuracy goal will require change to regulations in some cases	"Until the regulations and corresponding permit applications are changed, data collected for new industrial facilities will still be greater than 25 meters."	OWEP	Regulatory constraints should be addressed in program LDP implementation plans, waiver requests (Sec. 6.1.10).
EMAP seems to be singled out for LDPG adherence	"...EMAP must implement the LDP -- so does every other program in EPA. Why single out EMAP for special mention?" (Sec. 4.3.1.1)	EMSL-LV	E-MAP was not singled out, but merely referred to as a key data collection (same is true for STORET for OW).
Have LDPG reviewed by other state agents of Federal environmental laws (e.g., Depts. of Agriculture, Health)	"...Invite comments from other Minnesota state agencies that will be directly affected by this policy [e.g., MN Dept. of Health; MN Dept. of Agriculture]...These agencies have responsibilities for managing or creating EPA-funded data systems, either as direct recipients of EPA funds or as pass-through recipients from grants award by the MPCA."	MN	Regions may invite any appropriate state agency to review LDPG.
FICCDC is as of 10/90 (circ. A-16) Federal Geographic Data Committee (FGDC) - EPA is charter Steering Committee member	"...recently renamed the FGDC...." "Hasn't the FICCDC changed its name?" (Revise Secs. 5.2.2 and 5.2.3 to reflect current structures of FGDC and FGCC and EPA's relationship to them.)	OIRM/SEDM EMSL-LV OIRM/PSD/GIS	Changed all references from FICCDC to FGDC and/or FGCC as appropriate.
The LDP does not require automation of method, description and should be so stated in the LDPG	"The [LDP] does not require automation of method and description. The guidance should make this clear and describe how to handle these elements in user documentation."	OWEP	The LDP does not require automation of any kind (p. 8-1, paragraph 1); complete locational information in data bases will increase the utility of those data bases to secondary users. No change made.

LDPG ISSUES -- COMMENTS SUMMARY

MISCELLANEOUS (continued)

Types of Comments	Specific Comments	Commentors	Resolution
OIRM should provide acquisition vehicles for all the software mentioned in Chapter 7	"OIRM needs to obtain a vehicle if one does not exist to provide support to program office[s] who wish to use these methods [such as address matching services]."	OWEP	Datum conversion software is available to all programs from ORD. Responsibility for conversion software (e.g., address matching) given to OIRM (GIS program).
Policy format for lat/long differs between guidance and LDP	"The format for representing lat/longs has spaces in it. This is inconsistent with our standard for reporting, isn't it?"	EMSL-LV	Policy was written for clarity. Format in implementation guidance is the one to be adopted (Sec. 2.2.1 and 2.2.2).
Information Resource Dictionary System being developed within ASD might carry LDP data elements	"It is expected that an agency Information Resource Directory System, also known as a repository, will have capabilities to facilitate documentation, implementation and enforcement of standards such as the LDP."	OIRM/ASD	Not currently appropriate (IRDS for administrative data) but could be reconsidered at some future point.
Delete NPDES/DMR lab form from list because it is to audit lab facilities	"NPDES/DMR laboratory Performance Evaluation is a form used to evaluate laboratories and not regulated facilities. This form should be deleted from the list."	OWEP	Reference to this form in Appendix C (p. C-2) changed based on comment.
Description should be standardized and fixed-format, and should include date	"...It is very important that the 'description field' be dissected further to capture certain data elements such as 'date' in a <u>fixed</u> format. This will enable queries to be performed..."	OIRM/SEDM	No change (Secs. 2.2.5, 8.1.2.3). Impossible to itemize every distinct type of entity to be described, maintain the list, ensure QA, etc.

LDPG ISSUES -- COMMENTS SUMMARY

MISCELLANEOUS (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Regional SEDM coordinators can not "support data collection" and "assure" LDP adherence	"[Providing support for all data collection activities involving the states] is an impossible task for [regional SEDM coordinators] and may be beyond SEDM..." "...The role to ["oversee compliance"] is [one] few [regions] are likely to embrace..."	OIRM/SEDM OTS	Rephrased Sec. 4.3.1.3
Make sure Appendix D and chart in Chapter 7 coincide	"The accuracy ranges shown on the graph do not agree with the 'Observed Accuracies' stated in Appendix D. A person using the graph could be misled about the capability of a procedure to achieve the 25 meter <i>standard</i> {sic}..."	R7	Appendix D is no longer the "geocoding study." Instead, the <i>Guide to Selecting Latitude/Longitude Collection Methods</i> accompanies LDPG; the <i>Guide</i> has been reconciled with LDPG Ch. 7
"Method" need be documented only once for all measurements collected in the same way	"If the coordinates were obtained using the same method, a statement in the documentation under the latitude/longitude data elements should suffice.	OWEP	Method should accompany every observation of lat/long because users with access to data may not have access to its hard-copy documentation. No change made to requirement.
Delete repetitively collected forms from forms list, as there is no need to collect or document lat/long with every repetition	"The form NPDES Discharge Monitoring Report should be deleted from the list since this form is submitted on a monthly basis and lat/long would not need to be obtained this frequently..." "In the case of TRI where reports are submitted annually, why not populate the back-data with new lat/long data based on facility ID match? Basically don't perform data collection for facilities that are updated annually anyway."	OWEP OIRM/SEDM	To avoid repetition, programs should consider pre-printed forms for data collection once the basic location information is established; added as point in Sec 5.1.5. Can be addressed in LDP implementation plan.

LDPG ISSUES -- COMMENTS SUMMARY

MISCELLANEOUS (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Use phrase "geodetic coordinates defined in terms of lat/long" instead of "lat/long coordinates"	"Throughout this document, the phrase 'lat/long coordinates' is used. A more appropriate phrase would be 'geodetic coordinates' defined in terms of latitude and longitude."	R7	Recommended phrase added to Sec. 1.1.1.
EPIC is not a center of excellence	"EPIC is not a center of excellence, it is a component of EMSL-LV."	EMSL-LV	Corrected reference (Sec. 4.3.1.1)
New data collections may be driven by new regulations, not by LDP requirements	<p>"Is there addressed anywhere the fact that new data collections may be driven by new regulations?"</p> <p>"The [LDPG] should...expand its discussion of...the impact of additional lat/long data and...GPS [use] in reporting rules or permits...EPA[s] Information Collection Budget...is likely to be a critical point for many program offices, which are already coping with a lowering ceiling...Specifics are needed about the nature of support in rule making which can be expected from OPPE..."</p> <p>"...To minimize regulatory burden and encourage innovation, most rules specify only the goal (e.g., 25m) and allow reporters to use whatever means appropriate to achieve this..."</p>	<p>OSWER/LATF</p> <p>OTS</p> <p>OTS</p>	Regulatory constraints should be addressed in waiver requests (Sec. 3.3.3).
Earth is ellipsoid rather than spheroid so degrees of latitude are not always equidistant	"The distance between units of latitude are not 'always the same' since the earth is ellipsoid, even though it can be considered so for most practical purposes."	R7	No change made to reference (Sec. 2.2.3)

LDPG ISSUES -- COMMENTS SUMMARY

MISCELLANEOUS (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Sites visits may not be a reliable opportunity to collect or replace location identification data	"If EPA or states [are to] collect [lat/long] data, there is an issue of the right of entry to sites...EPA currently relies on inspection authority for most visits, and does not routinely visit sites applying for permits or submitting forms..."	OTS	Not all locational data needs to be collected by visiting the sites. Some can be collected by requesting them on application forms (such as a permit application form) or site visit (e.g., inspection) forms. On-site verification or data collection can be performed as the opportunities arise ("incrementally"). Sec. 6.1.2 reworded to address need to get site-entry permission.
LDP implementation is best accomplished on a program-by-program basis	"...The requirement to coordinate by law instead of program office (p. 6-1) is unduly burdensome...in...cases where portions of a law are administered by several offices..."	OTS	The intent of the reference on p. 6-1 was that implementation is to be accomplished on a by-program, not by-law, basis. Environmental initiatives, which may not have a law, were added.
Strengthen discussion on relevancy of revised policy	"...The distinctions between the original policy, which requires collection/documentation of locational data, method, and accuracy for all entities...and the revised policy which recommends GPS, a 25m goal, etc., must be emphasized better. One plausible reading of the document...is that the waiver process applies to all aspects of the policy, or of the need to collect locational data at all..."	OTS	Upon revision of the policy, the intent of the waiver process was also changed so that <u>waivers can apply to any aspect of the policy</u> , not just use of GPS or achieving the 25m accuracy goal.

LDPG ISSUES -- COMMENTS SUMMARY

MISCELLANEOUS (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Documentation of date	"...'Date' is required in the datum write-up." (Sec. 2.2.1.3)	OIRM/PSD/GIS	<i>Datum</i> is required as part of documentation of the method used to measure lat/long, <u>not</u> date.
Pollution prevention should be a motivation for LDP adoption	"...Highlight [references to states in Sec. 1.1, and list] pollution prevention [in Sec. 1.1.2 as an] Administrator priority..."	OIRM/PSD/GIS	Changes were made to Sec. 1.1.2 to refer to pollution prevention as recommended.
Expand the degree of Agency compliance with the FGDC	"...[Refer to the FGDC recommendation for] a spatial data transfer standard for the exchange of mapping, surveying and related spatial data using [lat/long]..."	OIRM/PSD/GIS	Sec. 1.2.2 has been revised to include the FGDC recommendations and clarify the relationship of the FGDC to the FGCC. Also added Sec. 8.2.3 to discuss the national Spatial Data Transfer Standard.

LDPG ISSUES -- COMMENTS SUMMARY

NAD27 vs. NAD83 and THREE DIMENSIONALITY

Types of Comments	Specific Comments	Commentors	Resolution
NAD83 is now government standard	"...The standard datum ... should be NAD83 rather than NAD27. It is more precise, ...identical to the datum used by GPS, and is the datum of the future."	R7	Changed recommendation for NAD27 to NAD83 throughout LDPG. Also, added OMB Circular A-16 as an "authority" in Sec. 4.2.4.
	"I would recommend that the use of NAD83 be initiated as soon as possible. Philosophically it seems backward looking to transform solid GPS data to NAD27...Using NAD83 which adopted the meter as a unit of length also eliminated the inherent confusion of unit of length in NAD27[,] where the U.S. foot, international foot, and meter were used by various states."	R7	
	"It is logical for EPA to begin using NAD83 at the onset of the LDP."	R7	
	"The USGS Topographic Instruction 89-1-D dated 12/26/89 ... states that all new map products or recompiled old products will appear in NAD83...At some time in the near future, EPA will have to transition to NAD83..."	EMSL-LV	
	"...NAD83..."	OIRM/GIS	
	"What datum has FGDC recommended? 27 or 83?"	OIRM/SEDM	
	"...The National Geodetic Survey is encouraging all mapping and surveying organizations who use or produce spatial coordinate information to transition from NAD27 to NAD83..."	OIRM/PSD/GIS	
	"...[Refer to the] Federal Register [for] NAD83 and SDTS*, etc." (referring to Sec 4.2.4 on authority)	OIRM/PSD/GIS	
	* -- Spatial data transfer standard (SDTS)		

LDPG ISSUES -- COMMENTS SUMMARY

NAD27 vs. NAD83 and THREE DIMENSIONALITY (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Require elevation (takes 3 dimensions to establish a point)	"All EPA data bases should include mandatory fields for elevation (Height above sea level) with the understanding that reporting could be waived. GPS collects the elevations so there is little reason to discard the third dimension..."	R7	No change. Elevation is not necessary to all data applications and is an additional burden which may not be achievable. The LDPG, however, clearly <u>does not preclude elevation from being collected</u> if the data collectors decide to do so. 3-D is to be collected when appropriate. Sec. 8.1.4 explains that lat/long, method, description, and accuracy can be in addition to, not instead of, other needed location identification data (which includes elevation).
	"I would strongly recommend that all EPA data bases include mandatory fields for elevation (height above sea level) with the understanding that reporting is optional...There are many instances where data is acquired at the same lat/long only at different heights.	R7	
	"...Note [that] more than one sample [can be] collected at the same geographic coordinates and [there may be] difficulty in reporting the data item without an elevation data item data base field."	R7	

LDPG ISSUES -- COMMENTS SUMMARY

REPORT FORMAT, PRESENTATION

Types of Comments	Specific Comments	Commentors	Resolution
LDPG is well-written	<p>"...[The LDPG] is a well written document and requires only minor editorial changes. I wish all of our guidance documents could be as organized, clear and concise as this one."</p> <p>"...This is a high quality document. You and your contractor staff are to be commended on the scope and clarity of this publication...."</p> <p>"...I think that you did an excellent job in putting together this document..."</p> <p>"...[The] draft [LDPG] document...is very well done! I congratulate you on tackling a very difficult subject and covering it thoroughly..."</p> <p>"...From EPA's perspective this document appears to be well prepared and reflects the findings from the Locational Accuracy Task Force..."</p> <p>"The authors of The Draft Locational Data Policy Implementation Guidance are to be commended for an excellent job in [identifying] issues relating to the Implementation of the Locational Data Policy (LDP)...The document was very well written and [we] look forward to using the document for guidance in the implementation of the LDP..."</p> <p>"...the guidance was well-written and provides the program office with useful information to fulfill the directives of the Locational Data Policy."</p>	<p>EMSL-LV</p> <p>EMSL-LV</p> <p>Assoc. Comptroller</p> <p>OARM</p> <p>OR</p> <p>R7</p> <p>OW/OWEP</p>	<p>The LDPG was written to anticipate all the issues that might come up during Agency-wide LDP implementation. The goal was to be comprehensive while still leaving managers of programs and geographic initiatives the opportunity to approach adoption of the LDP in a way most sensible to their missions.</p>

LDPG ISSUES -- COMMENTS SUMMARY

REPORT FORMAT, PRESENTATION (continued)

Types of Comments	Specific Comments	Commentors	Resolution
<p>The LDP is a worth-while endeavor</p>	<p>"...[OAQPS] ...totally agrees with the draft of the [Locational Data Policy] Implementation Guidance..."</p> <p>"...The Draft [LDP implementation] guidance represents the culmination of a very substantial effort. I concur with its implementation..."</p> <p>"The MPCA supports the establishment of standards for generating and documenting location data and EPA's efforts to encourage the collection of accurate locational coordinates along with other data. We feel that, if geographic information systems are to become feasible at the state and national level, such procedures are essential...Your guidance is...particularly timely in Minnesota..."</p>	<p>OAQPS</p> <p>OIRM/ASD</p> <p>MN</p>	<p>Full-scale adoption of the LDP will increase the value of all environmental data collections for primary and secondary users.</p>
<p>Commendable achievement of addressing technical and programmatic issues</p>	<p>"The document fairly represents the difficult task of combining information or data objectives with program objectives and then having to address the technical issues and resource issues..."</p> <p>"The February 1991 draft of the [LDPG] clearly addresses the complex issues associated with the 25 meter accuracy standard, and the Global Positioning Systems as the collection technology to attain the standard. The implementation appears to be firmly based on technical feasibility and the need for GIS analysis/display techniques to spatially integrate information for "total" environment decision-making..."</p>	<p>OSWER</p> <p>R7</p>	<p>Full-scale adoption of the LDP will increase the value of all environmental data collections for primary and secondary users.</p>

LDPG ISSUES -- COMMENTS SUMMARY

REPORT FORMAT, PRESENTATION (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Use larger type	"The print size should be enlarged. The current size is hard to read."	OWEP	No change. Trying to keep already lengthy document to as few pages as possible.
Correct phone numbers	"My correct phone number is (702) 798-2377. Also under ORD/EMSL-LV add Terry Slonecker as a secondary contact at (703) 349-8970."	EMSL-LV, EPIC	All telephone numbers for contacts in Appendix B were updated for 1/14/92 draft.
Remove Case Studies	"...case study removal..." "Chapter 9 Case Studies -- to be removed?" "...Omit [case studies from the LDPG]..."	OIRM/GIS OIRM/SEDM OIRM/PSD/GIS	Case study chapter (originally "Chapter 9") was removed from LDPG.
Change format to "what, why, how, what-to-do"; use TQM concepts	"The format of the Guidance should be changed. It's important to state WHAT the policy is, in layperson's terms. Included with that topic is the reason WHY for the policy. Use a few TQM concepts such as customer, supplier, and user..."	OSWER/LATF	Selected format based on analysis and categorization of Green Border comments and LATF outcome . No change made to format.
Chapter 3 too much like Appendix A.	"Chapter 3 - Should be an Appendix"	OSWER/LATF	Chapter 3 is a translation of the LATF outcome into Agency-wide guidance; Appendix A is actual LATF recommendations. No change made.
Put implementation schedule "up front," especially when implementation plans are due	"If these are the true timing requirements, they should be placed up front in summary at least, along with the required approach and products."	OSWER/LATF	Already summarized in front of chapter in Exhibit 5-1 (p. 5-2). No change made.
Capitalize "State"	"State should be consistently capitalized."	OIRM/SEDM	<i>State</i> is capitalized when it is a name, and not capitalized when it is a noun or an adjective.

LDPG ISSUES -- COMMENTS SUMMARY

REPORT FORMAT, PRESENTATION (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Use correct terminology for Community Right to Know Act	"The more correct term for SARA Title III is the Emergency Planning and Community Right-to-Know Act, or EPCRA."	OTS	Changed all references from <i>SARA Title III</i> to EPCRA
Choice of print style should be different	"...The line spacing seems too wide...11 on 14 often works well..." "...The use of bold and italic is excessive...[Confine] the use of bold to headings and titles or keywords/phrases in bullet points..."	OTS OTS	<i>Bold and italics</i> were used to highlight key points not to be missed. Although the use of bold and italics was reduced, no change made to basic report format in this context.
Avoid using brand names	"...[The paragraph reading '...private vendors, such as Roadnet, ETAK, GDT, and Dun and Bradstreet...' in Sec. 7.1.1.1] could be seen as an endorsement..."	OIRM/PSD/GIS	Removed (or minimized the use of) brand names from Sec. 7.2.1.1 (formerly 7.1.1.1) and other references.
Correct terminology when referring to data within the LDP scope	"...[Change 'locationally-based' in Sec. 2.1.1 to geographically-based when referring to the applicability of data]..."	OIRM/PSD/GIS	The phrase "geographically-based" is more comprehensive than our point here; the data we are referring to are <i>about a place</i> , and are therefore <i>locational</i> , not <i>geographical</i> . No change made to Sec. 2.1.1 or Sec. 2.1.1.1.
Correct section reference	"...[Section 3.1.3 as referred to in Sec. 2.1.1.2 does not exist]..."	OIRM/PSD/GIS	Changed reference to say "Chapter 7."
Add a bibliography with appropriate references.	"...This document will require a bibliography [including] FIPS and FGDC [references]..."	OIRM/PSD/GIS	Secs. 1.2.2 and 4.2.4 refer to Federal inter-agency groups and their documentation. No separate bibliography was created.

LDPG ISSUES -- COMMENTS SUMMARY

TECHNIQUE, TECHNOLOGY

Types of Comments	Specific Comments	Commentors	Resolution
Emphasis on GPS overstated, resulting in dependence on it	<p>"...In light of the rapid schedule for converting and replacing non-Geo-Positioning System (GPS) coordinate data with GPS-generated coordinates and the stated expectation for "widespread" use of GPS for collecting new latitude and longitude data "by 1992," the draft LDP Implementation Guidance does not appear to reflect the cautions of the LATF (appendix A) against "total dependence upon GPS technology."</p> <p>"...That this policy will evolve in accord with improvement of measurement techniques, with advances in the information engineering discipline, and with advances in information technology."</p>	<p>MN</p> <p>OIRM/ASD</p>	<p>GPS is presented in Ch. 3 as the current best technology, but method will be continuously re-evaluated to see if GPS is still the only/best method option. Sec.3.3.2 begins with "...the LATF recommendation is to have the best available technology applied to the collection of locational data.</p>
Have Tech-Transfer "fairs," workshop for LDP plan developers	<p>"We suggest EPA organize a series of GPS technology fairs in which states, EPA staff and vendors of GPS technology can share ideas and learn what is available and what is needed."</p> <p>"I suggest a workshop with your 'suppliers,' the ones that have to write the plans...Have a session with them which would be partly educational and partly participative so you could hear from them how the guidance document could be improved."</p> <p>"[What is 'LDP awareness training' referred to in Sec. 4.2.3]?"</p>	<p>MN</p> <p>OSWER</p> <p>OIRM/PSD/GIS</p>	<p>OIRM will conduct implementation workshops; reference to "awareness training" rephrased in Sec. 4.2.3. to say "workshops." Also added Secs. 4.3.1.5 and 4.3.1.6 to describe the role that the Regional GIS and GPS Work Groups can play in technology and expertise transfer.</p>

LDPG ISSUES -- COMMENTS SUMMARY

TECHNIQUE, TECHNOLOGY (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Emphasize the need for specially trained staff	<p>"In the....GPS [description] (Chapter 1), consider: 'Requires a technician trained to use a GPS receiver and a technician trained to differentially post-process receiver data.' The expertise required to attain the coordinates with GPS should be reiterated throughout the document."</p> <p>"...It is important to reiterate throughout the document the expertise required to attain geographical coordinates with GPS...Exhibit 7-3, ...the expertise row of the GPS column, ...may better be expressed as "requires technician who knows how to use a GPS receiver and a technician who knows how to differentially post-process receiver data."</p>	R7 (2 times)	Need for trained personnel emphasized in GPS description (Sec. 7.3.5)
Explain how code list is to be maintained, expanded	"The Method code list for determination of lat/long is not all inclusive. A procedure to add more codes is needed."	R7	Maintenance of list of codes currently within OIRM/IMSD, but will be transferred to appropriate group, either National GIS program in PSD, or Regional GIS Work Group.
Reference forthcoming <i>"Guide to Selecting Latitude/Longitude Collection Methods"</i>	<p>"OIRM is working on... 'Guide to Selecting Lat/Long Collection Methods' ..."</p> <p>"Assuming [GPS] is the technology used in the collection process, the forthcoming 'Guide to Selecting Lat/Long Collection Methods' leaves room for each program to determine what is feasible for them to accomplish."</p> <p>"...[Include the final report of the geocoding study as a compendium to this document]..."</p>	<p>OIRM/GIS</p> <p>OIRM/SEDM</p> <p>OIRM/PSD/GIS</p>	The <i>Guide</i> is referred to throughout the 1/14/92 draft of LDPG for process to select a method, process to estimate costs, and information on several geocoding methods. The <i>Guide</i> also is to accompany the LDPG (with the GPS Primer).

LDPG ISSUES -- COMMENTS SUMMARY

TECHNIQUE, TECHNOLOGY (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Require DQO development instead of recommending it	<p>"...mentions DQOs, which should be the bases (sic) for determining how accurate the data should be...[Programs should] be required to use the DQO concepts, principles, and approach in the LDP implementation plans..."</p> <p>"[Development of DQOs for planning and waiver requests] ... should head the list of media program office responsibilities..."</p> <p>"OIRM and ORD should develop specific DQO guidance [regarding locational identification data] for program offices...Such guidance must be available well before completion of program implementation plans [and should address potential secondary as well as primary use]..."</p> <p>"...[Add DQO development as part of the method determination process]..."</p>	<p>OSWER</p> <p>OIRM/SEDM</p> <p>OTS</p> <p>OIRM/PSD/GIS</p>	<p>The DQO process is valuable for identifying the level of accuracy necessary and selecting a lat/long measurement method appropriate for that level of accuracy. Performing the DQO process to determine needed accuracy for lat/long is entirely at the discretion of the data collector (but should be done for waiver requests). However, it is valuable to recommend DQO development also be part of the method selection process (Sec. 7.3.7). Chapter 6 opens with a detailed discussion of DQOs. Also, the <i>Guide to Selecting Latitude/Longitude Collection Methods</i> presents a process for method selection that is heavily reliant on DQOs.</p>
It is difficult to automatically verify whether accuracy goal is being met	<p>"There are currently no automated QA checks which can detect errors at the accuracy goal of 25m. OIRM should...study [a combination of approaches, e.g., edit check to see if lat/long is in appropriate city and ZIP code] as a follow-on to the geocoding study, and provide...data and code to major EPA systems..."</p>	OTS	<p>The LDPG does not address to the level of detail of edit check options. PSD may be a source of information on available edit check software.</p>

LDPG ISSUES -- COMMENTS SUMMARY

TECHNIQUE, TECHNOLOGY (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Conversion methods are not really "methods" -- they are secondary methods for converting data already obtained	"The codes SPCSCONV, TSRCONV, UTMCONV are not really descriptions of methods. These codes refer to conversions from other coordinates systems and don't tell about the original survey method."	EMSL-LV	Added a discussion to Sec. 7.2 to explain the difference between a collection and a conversion method.
Identify source of project planning software to produce Program Implementation Plans, as recommended in LDPG	"The document suggests the use of project planning software to develop Program Implementation Plans. OIRM should provide a contact and make available this software to offices who do not currently have access to it."	OWEP	OIRM is developing an approach, called a "template," for development of program plans, introduced in Sec. 4.2.2 and Sec. 6.2.1, so reference to project planning software in what was Sec. 6.2.1 of the 2/1/91 draft was deleted.
Document is unclear as to what recommendations are for "method" -- why promote GPS and describe all those other methods?	<p>"LATF recommends GPS usage. This document flip-flops between stressing GPS as what must be used and other options based on each program's DQO's (7.2.7*)..."</p> <p>* -- Now Sec. 7.3.7</p>	OIRM/SEDM	The method used should be the best available technology. In Ch. 3, explained the difference between the intent of the policy and the endorsement by LATF of GPS as a data collection method; and that GPS is currently considered the best implementation approach, but preferred method may change with progress and new technology
Data conversion choice needs more guidance	"[Add] the factor of another conversion factor as follows: 'FILE structure -- Is the file an ARC/INFO coverage or ASCII file? NADCON may be used for ASCII files; CDATUM may be used for ARC/INFO coverages...'..."	EMSL-LV	Expanded Sec. 7.2.3 to have 2 options: NADCON and CDATUM. Added Sec. 7.2.3.2, modified Exh. 7-2.

LDPG ISSUES -- COMMENTS SUMMARY

TECHNIQUE, TECHNOLOGY (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Need guidance on how to define location of entities that can also be hydrologically sited	"...For river reaches where discharges are what is sought for record, data should approximate the pipes and not the facility boundary adjacent to the river..."	OIRM/SEDM	Intent of LDPG is that locational data represents whatever the attribute data represents; so if attribute data is of effluent from a pipe, location identification data should be of the pipe, not the receiving stream reach. No change made.
Unclear how to coordinate lat/long data with hydrologic identification data	"...For stream segments, it would probably be more accurate and less burdensome to collect the extremes of the segment, with reference to the RF3 segment number than attempt to collect newly digitized data along the entire segment..."	OTS	Removed reference to reach file on p. 2-8 of 2/1/91 LDPG because intent is <u>not</u> to redigitize RF3.
Address-matching only provides an approximation	"Guidance must stress that address-matching provides only an estimate of given address through interpolation along a street segment."	EMSL-LV	Included in Sec. 7.2.1.1 discussion
NADCON does not work in ARC/INFO environment	"NADCON limitation: does not work in ARC/INFO. I would recommend another column for CDATUM which works in an ARC/INFO environment...EMSL-LV has implemented NADCON (...the approved software for converting between datums) in a GIS environment in a program called CDATUM. CDATUM allows conversion of ARC/INFO coverages while NADCON works only in ASCII format.	EMSL-LV	Included in Sec. 7.2.3 discussion
Requiring GPS will minimize expenses of locational data collection.	"...[The statement that the 'number of different types of equipment that must be purchased and the training that must be given' can be minimized by Agency-wide use of GPS is] wrong..." (Referring to second bullet under Sec. 3.3.2)	OIRM/PSD/GIS	Limiting the different types of equipment that can be used probably <i>will</i> reduce the variability in equipment used and training necessary. No change made.

LDPG ISSUES -- COMMENTS SUMMARY

FACILITY DEFINITION

Types of Comments	Specific Comments	Commentors	Resolution
Facility definition needs to be clarified	<p>"Facility definition [needs to be clarified in terms of] tiers for gathering points..."</p> <p>"We still need the definition that uniquely determines what a "facility" is [regarding] the Agency standard and therefore, regarding the new FINDS."</p> <p>"The document needs a section which clearly defines a facility and other collectable entities such as smoke stacks and discharge pipes."</p> <p>"...Other general issues include definition of a facility (e.g., TSCA may define a facility differently from SWA, CAA, etc.)..."</p>	<p>OIRM/GIS</p> <p>OSWER</p> <p>OIRM/SEDM</p> <p>OTS</p>	<p>Added definition from Chapter 1 of the FIDS as Appx. D; accompanying <i>Guide</i> addresses having a particular point represent whole facility. Added more guidance to Sec. 2.4.1 (formerly Sec. 2.2.1.2).</p>
Define "tiers" more clearly	<p>"A section on 'tiering of what a facility is' should be included or referenced. For example, Tier 1 = Front door; 2 = facility centroid; 3 = fence line; 4 = intersection closest to fence line..."</p> <p>"The definition of 'tier' is confusing and needs to be clarified."</p> <p>"First use of 'tier' is confusing since it has its own meaning with regard to this policy. This is better explained by coming from the DQO concept."</p> <p>"...Tiers for gathering points..."</p> <p>"The tiering concept needs to be better defined..."</p>	<p>OIRM/SEDM</p> <p>OWEP</p> <p>OSWER</p> <p>OIRM/GIS</p> <p>OTS</p>	<p>No change. Locational data are to be of whatever the attribute data (e.g., monitoring data) is referring to, and that entity (or "tier") is to be communicated to secondary users by the value in the "description" data element.</p>

LDPG ISSUES -- COMMENTS SUMMARY

FACILITY DEFINITION (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Applicability of the LDP to temporary sites needs to be determined	<p>"...In Superfund, many sites are identified for a short period of time. Only a small percentage become NPL sites, so there is a distinction as to the need for locational data for each kind..."</p> <p>"...Should off-site facilities not under the control of the submitter have information collected [e.g., ...TRI waste transfer sites]?"</p>	<p>OSWER/CERCLA</p> <p>OTS</p>	<p>Added guidance to Sec. 2.1.2 that <i>if permanent records are kept on temporary places, location identification data should be part of those records.</i> There may be many reasons why someone may want to identify the location of an incident or activity that no longer exists.</p>
Provide guidance on facility location determination	<p>"...[Following the sentence reading 'The data collector must (provide) the single point that is most representative of the entire facility within the accuracy bounds that must be adhered to and document it in the "DESCRIPTION" field'* should be a sentence reading] Guidance is provided in OIRM document "___" which accompanies this document."</p> <p>* -- Now in Sec. 2.4.1 on "Tiering and Spatial Extent</p>	OIRM/PSD/GIS	<p>Sentence added to Sec. 2.4.1 referring to <i>Guide to Selecting Latitude/ Longitude Collection Methods</i>. OIRM is developing workshop curricula with guidance for deciding which point represents a facility; specific definitions for each entity type or circumstance will be in the LDP implementation plans. Therefore, no such guidance will be given in this LDPG. However, Appendix D was changed to excerpt the guidelines for facility designation (NOT location) from the FIDSIP.</p>

LDPG ISSUES -- COMMENTS SUMMARY

ACCURACY

Types of Comments	Specific Comments	Commentors	Resolution
Not all data collections need locational data accurate to within 25 meters; distinguish between administrative data and scientific data	"There is a distinction between the lat/long for administrative purposes in a program, and the lat/long for scientific purposes. The scientific data needed for standards and now as part of corrective action are still on the 'like to have' list, since there are few resources..."	OSWER/RCRA	Secs. 2.1.1.1 and 2.1.3 explain data and activities under the scope of the LDP. LDP Implementation Plans and waiver requests will address any need for exceptions. No change made to LDPG in response to this comment.
DQOs should determine the level of accuracy to be achieved, and should be responsibility of program managers	"The LDP Implementation Plan for each of the Offices' programs should be based on DQO concepts, so that the level of accuracy to work toward fits the program's goals as well as the Agency's goals. The DQO process should satisfy the programs, as they go through it, so that they know they've documented and justified their objectives, deadlines, constraints, and the resulting implementation plans..."	OSWER	Chapter 6 (LDP Implementation Plans) begins with a description of the value of the DQO process (and its role in LDP waivers), and the Quality Assurance Management Staff (ORD) is listed in the contacts.
A way of verifying accuracy needs to be standardized	"...What should be the point of reference for accuracy for an entire facility?"	OTS	The point of reference for accuracy should be the most visible, accessible point in a facility, which should be documented in the "description" data element (Sec. 2.4.1). That point will yield the most <i>precise</i> location identification data (a measurement which is most likely to be repeatable).
There may be strong justification needed for the 25m accuracy goal	"...The incremental benefits of specific levels of accuracy vs. cost are... needed...[in] part to justify inclusion in reporting rules to OMB, industry, and the public..."	OTS	Achievement of 25m accuracy is a <i>goal</i> , not a requirement, and should therefore not have OMB implications.

LDPG ISSUES -- COMMENTS SUMMARY

ACCURACY (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Confidence level of accuracy should be "reasonable"	"...[Change '95% confidence level' for accuracy range to 'reasonable']..."	OIRM/PSD/GIS	Relaxing the confidence expectation from 95%, for which a statistical/mathematic approach can be developed, to a 'reasonable' level, could lead to data incompatibility and compromised quality. 95% confidence level remains (Sec. 2.2.4).
Use caution in interpreting LATF findings	"...[Referring to the three bullets in Sec. 3.3.1 about why the 25 meter accuracy goal was established], who did [a review of program requirements which determined that a target of 25 meters was consistent across programs]?"	OIRM/PSD/GIS	A presentation was made at the LATF by OSWER, who surveyed program needs (refer to memo dated 10/16/90 from the Deputy Director of Solid Waste to the Director of the Office of Water Regulations and Standards requesting a response to questions on the implementation of EPA's [locational data] policy with an accuracy standard).

LDPG ISSUES -- COMMENTS SUMMARY

FINDS

Types of Comments	Specific Comments	Commentors	Resolution
<p>Why address-match in FINDS if programs have to collect lat/longs for facilities?</p> <p>Redundant effort</p>	<p>"[We]...question the FINDS initiative to do address matching. Since the push is on, in the programs, to start collecting or correcting lat/long data based on this requirement, what is the purpose of address matching for those facilities? Won't there be two values for a facility - one updated value from the program and one new value derived from address matching? Will the FINDS results satisfy the accuracy requirements?"</p> <p>"Prior to employing address matching in FINDS, OIRM should canvass the program offices to see if lat/long coordinates exist in the program information system. If so, the lat/long(s) from the program information systems should be used."</p> <p>"...There is a very real likelihood of redundant reporting of facility coordinates. In many cases, EPA data systems and data management practices prevent widespread use of lat/long coordinates already collected...Should encourage full utilization of existing EPA data."</p> <p>"OIRM is the custodian, not the data gathering arm(.) This would be a program office responsibility." (Referring to Sec. 5.1.8.)</p>	<p>OSWER</p> <p>OWEP</p> <p>OTS</p> <p>OIRM/PSD/GIS</p>	<p>Population of FINDS with facility location identification data is OIRM's demonstration of adherence to the LDP (Secs. 4.2.2 and 5.1.6). Programs may track sub-entities at a facility and need not measure the lat/long coordinates for the facility-as-a-whole if they are not germane to the program mission and is in accordance with other aspects of this guidance (e.g., the "tier" to which the data refers).</p>

LDPG ISSUES -- COMMENTS SUMMARY

FINDS (continued)

Types of Comments	Specific Comments	Commentors	Resolution
Address-matching to add lat/longs to FINDS will be performed as resources are available, or may not be performed; FINDS management is not currently populating lat/long fields	<p>"[OIRM] can probably do [FINDS address matching] in FY92...Within resources available, OIRM will begin the process of populating the FINDS inventory with lat/long..."</p> <p>"...[The statement that 'FINDS will obtain locational data using address matching or from media data bases through automated updates'] was a recommendation and not a given..." (referring to Sec. 4.2.2 on PSD responsibilities)</p> <p>"The third paragraph on page 8-6 describes that FINDS management is in the process of populating lat/long data elements in FINDS facility records...This is not the case at this time....We are not filling [the FINDS lat/long fields with any values]...until such time as management has decided on the funding issue..."</p>	<p>OIRM/OD</p> <p>OIRM/PSD/GIS</p> <p>OIRM/PSD/FINDS</p>	<p>Although this has not been finalized, "lat/long" will be part of the alias file in the FINDS redesign, enabling FINDS to copy lat/long data from program systems. Sentence in Sec. 4.2.2 has been reworded and reference to FINDS in Sec. 8.2.1 has been scaled down (but not deleted). Sec. 5.1.6 does explain OIRM's plans to address-match FINDS facility records to create lat/longs for each applicable facility record.</p>
FINDS will not have more than one lat/long coordinate value per facility (FINDS may not include location identification data for "sub-facility tiers.")	<p>"...The... new FINDS will contain one field per facility for lat/long, and the data elements required to fulfill the EPA Locational Policy."</p> <p>"...I don't remember [the statement 'inclusion of accurate lat/long coordinates for sub-facility tiers such as discharge pipes or stacks'] as a LATF recommendation; it was [a suggestion] but not a formal recommendation."</p>	<p>OIRM/PSD/FINDS</p> <p>OIRM/PSD/GIS</p>	<p>Same as previous.</p> <p>LATF finding regarding documentation of sub-facility locational data in FINDS (Sec. 3.3.5, second bullet) was deleted.</p>

LDPG ISSUES -- COMMENTS SUMMARY

RESPONSIBILITIES

Types of Comments	Specific Comments	Commentors	Resolution
Decision should be made to establish the IRM Steering Committee as the appropriate audience to review waiver requests	<p>"...[The procedure that the IRM Steering Committee will evaluate any requests for waivers from the policy]...was not determined (p. i-2)</p> <p>"...[Change sentence in Sec. 1.1.3 to read]...'Applications for waivers will be made to the IRM Steering Committee who will review the applications and make recommendations for compliance to the policy...'"</p> <p>"...[IRM Steering Committee receipt of Program LDP Implementation Plans will] allow for cross-program collaboration and reduce chance of redundant effort..." (referring to Sec. 5.1.2)</p>	OIRM/PSD/GIS	The IRM Steering Committee currently has the role of reviewing LDP Implementation Plans and waiver requests, and granting or denying waivers Sec. 4.1). Its role as recipient of waiver requests remains unchanged (Sec. 1.1.3, 4.1, and 5.1.2).
PSD has been reorganized	"[Delete the identification of the ITIB]." (referring to Sec. 4.2 and Exhibit 5-1)	OIRM/PSD/GIS	As PSD has been reorganized, the entire reference to PSD(Sec. 4.2.2) has been revised.
GIS policy is no longer overseen by ORD	"ORD does not set GIS policy; OIRM does."	OIRM/PSD/GIS	The National Mapping Program within OIRM/PSD, instead of ORD, currently has the responsibility for Agency-wide GIS policy; revised Secs. 4.2.2 and 4.3.1.1 accordingly. Regional GIS Work Group (Sec. 4.3.1.5) may eventually have a role in policy development.
Attribute responsibility for GPS guidance to the Regional GIS Working Group	"An additional reference for the implementation of GPS technology will be the GPS sub-group under the direction of the Regional GIS Working Group, which consists of the Agency's regional GIS teams, ORD, NDPD, and the HQ GIS Program Office staff..."	OIRM/PSD/GIS	Regional GPS Work Group introduced in (new) Sec. 4.3.1.6, but official responsibility not yet determined.

LDPG ISSUES -- COMMENTS SUMMARY

RESPONSIBILITIES (continued)

Types of Comments	Specific Comments	Commentors	Resolution
NDPD is not responsible for system updates regarding locational data	"...What about systems updates to place the [lat/long] data (and attributes) once they are collected?" (referring to NDPD responsibilities as presented in Sec. 4.3.1.4)	OIRM/PSD/GIS	System updates to incorporate location data, once collected, into data bases, is the responsibility of each program and not NDPD. No change made to 4.3.1.4.
Role of IRM Steering Committee should be included in description of other's responsibilities	"...[AAs (etc.) and SIRMOS must see that program LDP implementation plans are developed and submitted to the IRM Steering Committee]..."	OIRM/PSD/GIS	Reference to SIRMO accountability to IRM Steering Committee added to second bullet of Sec. 4.3.3 and Exhibit 4-4.
Delete data base managers' responsibility for FINDS locational data	"...[Are data base managers responsible for coordinating with FINDS [for the LDP]...?" (Referring to Sec. 4.3.3)	OIRM/PSD/GIS	Responsibility removed from LDPG. This <i>is</i> , however, data base managers' responsibility under the Facility Identification Data Standard.
Emphasize resource savings by program collaboration	"Mention...program collaboration and economics." (Referring to Sec. 6.1.2 and 6.1.8)	OIRM/PSD/GIS	Changes made as recommended (only to Sec.6.1.8).