

SWIS DIP Guidelines: XML Submission

CalRecycle

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1.0 SWIS DIP Overview

1.1 Purpose and Parties

This data exchange agreement defines the terms and conditions under which **Local Enforcement Agencies** (LEAs) (CCR Title 14 18011) will participate in the voluntary SWIS Digital Inspections Program (SWIS DIP) for electronic submittal of solid waste facility¹ inspection data to the **California Department of Resources Recycling and Recovery (CalRecycle)**. After reviewing all of the information about the program on the [SWIS DIP Web site](#) the LEA's **Program Manager** will sign the cover page of this data exchange agreement document and indicate the LEA's **Primary Program Contact**, and any other number of contacts who should have access to submit online inspection reports.

This agreement is not a legal document and does not supersede any existing agreements or Memoranda of Understanding between the LEA and CalRecycle. It is only intended to address the specifics on the one-way electronic exchange of solid waste inspection data from an LEA to CalRecycle. Participation in this voluntary program may require the LEA to evaluate and possibly modify their existing business practices relative to finalizing and submitting inspection data.

1.2 Background

CalRecycle's Solid Waste Information System (SWIS) database contains information about the state's solid waste facilities, including inspection and enforcement data. Much of the SWIS data is directly available to the public via the [CalRecycle SWIS Internet site](#). The SWIS Digital Inspections Program was initiated in 2008 at the request of LEAs and the California Conference of Directors of Environmental Health (CCDEH) for CalRecycle to provide opportunities for LEAs to submit data to CalRecycle using industry-standard data exchange standards such as XML and web services. The program's focus involves providing LEAs with **pragmatic** techniques they can **voluntarily** use instead of paper submission, minimization of CalRecycle costs for implementing these new approaches, and maintaining the CalRecycles's existing investments in electronic processing of paper forms. Because of the focus on pragmatic approaches and low costs, the program uses simple approaches and avoids dependencies on technologies and data standards that are complex or not yet widely adopted/accepted.

The program's goals for LEAs includes providing LEAs already using their own data systems with industry standard methods to provide their data to the CalRecycle, as well as providing LEAs without data systems a method to easily submit data via a web form. CalRecycle's goals for the program include assisting LEAs, increasing the accuracy and completeness of inspection data submittals, decreasing the time it takes for LEAs to submit inspection data to CalRecycle, and decreasing the time it takes CalRecycle to process, review, and make inspection data available to the public via the SWIS Internet site.

¹ In the context of the SWIS Digital Inspections Program, "solid waste facility inspections" refers to all facilities (permitted facilities), all Disposal Sites, and all EA Notifications (operations). See 14 CCR 18083.

1.3 Definition of Data

The program solely involves electronic submission of solid waste inspection data as mandated of LEAs by PRC 43218 and [CCR Title 14, Section 18083](#), as well as any attachments the LEA generates as part of a specific facility inspection. Such attachments could include field notes, photos, maps, spreadsheets, monitoring data, etc. that the LEA generates or converts into typical electronic document file formats (e.g., .doc, .pdf, .gif, .jpg, .xls, etc.). Unlike with CalRecycle's existing paper form process, electronic inspection data **must** be fully completed and include comments for each violation or area of concern, or the entire electronic submission will not be accepted.

The program does **not** include:

- Documents for solid waste facility enforcement, permit applications, etc.
- Inspection data for solid waste facilities that **do not** have a CalRecycle-assigned SWIS number.
- Inspection data for waste tire facilities².

2.0 Roles and Responsibilities

2.1 Legal Framework

LEA participation in the SWIS Digital Inspections Project does not change or negate any statutory and regulatory requirements for LEA inspection submittals to CalRecycle (PRC 43218 and 14 CCR 18083). LEA participation in the SWIS Digital Inspection Program is voluntary, and dependent upon the LEA demonstrating (and maintaining) their technical ability to use the system. LEAs are responsible for submitting inspection data by their mandated deadlines, regardless of their current status or ability to use the SWIS DIP System. For example, if an LEA was suddenly unable to use the SWIS DIP system due to a failure of their in-house data system or loss of key staff, the LEA would still be responsible for submitting data via paper form (or making other arrangements with CalRecycle staff).

An LEA's electronic inspection data submittal is equivalent to submitting a paper inspection form via US postal mail if:

- The inspection meets all of the LEAs legal mandates regarding solid waste facility inspections; and,
- The inspection data is entered/uploaded by an LEA staff member or other representative previously designated by the LEA as having authority to use the SWIS DIP system for inspection submittals; and,
- The SWIS DIP system does not reject the submittal because it is in the wrong format, is missing data, has incomplete/insufficient data, is a duplicate record, or other errors; and,
- The SWIS DIP system provides a message indicating the inspection record(s) has been accepted into the system.

As with paper forms, CalRecycle still retains the right to contact the LEA and request additional/clarifying information before it loads the inspection into CalRecycle's SWIS Database. However, the data validations performed by the SWIS DIP system should greatly reduce the incidence of post-submittal follow-ups.

² Because waste tire inspection forms are more complex than solid waste facility inspection forms, CalRecycle deferred their electronic submittal until a sufficient number of LEAs adopt solid waste facility submittals to allow a cost effective program for waste tire inspection data.

In the event an LEA modifies an inspection record data after it has been submitted to CalRecycle (e.g., to correct an LEA's data entry error), the LEA is responsible for ensuring the facility operator/owner is provided with the modified inspection and a new updated record is electronically resubmitted to CalRecycle.

2.2 Contacts

Defined below are key contacts in the SWIS Digital Inspections Program:

SWIS DIP Coordinator: CalRecycle's primary point of contact for all LEA's participating or interested in SWIS DIP.

LEA Program Manager: The LEA's Program Manager is the person who has overall administrative responsibility for all aspects of the LEA's solid waste program. The LEA's current Program Manager must notify the SWIS DIP Coordinator immediately via a written communication (email or paper mail) if they are taking over from a previous program director.

LEA Primary Program Contact: The LEA's primary contact with CalRecycle and SWIS DIP Coordinator for its participation in SWIS DIP. **This person is CalRecycle's first point of contact if there are problems or questions.** This person may perform the actual data entry/uploads into the SWIS DIP system, although they may supervise/delegate this activity to the LEA Technical Contact or other users. The Primary Program Contact would be responsible for notifying the SWIS DIP Coordinator via written communications about any changes to the LEA's users/contacts. The LEA's Program Manager must notify CalRecycle immediately in a written communication when a Primary Program Contact changes.

LEA Technical Contact: The LEA's primary technical contact for SWIS DIP that has knowledge of XML data transfer and related information technologies. This person could be the same as the LEA Primary Program Contact for simpler data exchanges via web forms (see 2.3 below), but for XML-related data exchanges would generally be an information technology professional, either on the LEA's staff or hired as a contractor.

Other Users: The LEA's Program Manager or Primary Program Contact can designate other users to access and use the SWIS DIP System. Other users could be LEA staff or contractors. LEA management/staff is responsible for all actions performed by their contractors. LEAs can opt to identify as many other system users as they truly need, but having a smaller number of authorized users is a best security practice.

The LEA is responsible for alerting CalRecycle's SWIS DIP coordinator **immediately** if the LEA's program contact, technical contact, or any other user authorized by the LEA is no longer employed/affiliated with the LEA or should otherwise not be permitted to access the system. Any data submitted by a user no-longer employed and/or affiliated with an LEA could result in CalRecycle removing that data from SWIS and requiring appropriate re-submittal by the LEA.

To ensure the security and integrity of the SWIS DIP system, a separate CalRecycle WebPass **must** be created for each user of the system. Authorized users of the SWIS DIP system **must** protect their CalRecycle WebPass password to ensure the integrity of the system. If and LEA representative suspects their password may have been compromised, they should go the [CalRecycle WebPass home page](#) and change it immediately. If you are unable to access your WebPass account because it has been "hijacked" by another user, contact the CalRecycle Webmaster immediately at webmaster@calrecycle.ca.gov.

2.3 Exchange Methods

The SWIS DIP Program offers three different data exchange methods. LEAs can start data submissions in one method (e.g., web forms/on-line submission) and later evaluate/test a different method (e.g., EnvisionConnect or other provider) or use two at the same time.

With this application, your LEA is applying to submit inspections via:

XML Batch Submission: LEA staff/representatives/contractors with XML (and probably programming) expertise will format their inspection records into a batch XML file using CalRecycle's prescribed [SWIS Inspection Schema](#) (data definition). One or more pre-determined LEA representatives will access a secured CalRecycle Internet site and upload the XML batch file to the site. If the XML file is improperly formatted, any record is a duplicate, or **any** data field in **any** record does not match the prescribed SWIS Inspection Schema, the **entire** batch submission will be rejected and the LEA representative will be provided with detailed error information to assist in correcting the batch file and successfully resubmitting it.

XML Web Service: LEA staff/representatives/contractors with programming and XML expertise will perform custom programming within the LEA's data automation environment that allows its workstations/servers to directly submit individual XML-formatted inspection records (using CalRecycle's prescribed [SWIS Inspection Schema](#) to the CalRecycle's secured XML web service using a CalRecycle prescribed SOAP ([Simple Object Access Protocol](#)) header (including an LEA security keycode issued by CalRecycle). If an individual inspection record is improperly formatted, incomplete, or a duplicate, it will be rejected and the web service will return an XML response with error information.

All LEA staff who will be submitting inspections on-line need to acquire a CalRecycle WebPass account.

2.4 Exchange Schedule

LEAs are already legally required to submit inspections to CalRecycle within 30 days of the inspection, and this schedule should be followed for SWIS DIP as well. However, since one of the program's key goals was to make inspection data available in a timelier manner to CalRecycle and the public, participating LEAs are encouraged to submit data as quickly as possible.

If an LEA's designated representatives do not access/use the SWIS DIP site for more than 30 days, the Primary Program Contact will begin receiving periodic reminder emails until the system is accessed.

Inspections submitted by LEAs via SWIS DIP are maintained in a "holding area" or queue until CalRecycle staff has conducted a final review of the electronic inspection record for accuracy and completeness. These reviews will occur within one week of an inspection's submittal by an LEA, after which CalRecycle staff may request additional/clarifying information from the LEA, or otherwise post the inspection into production and the CalRecycle Internet site.

2.5 Dispute Resolution

LEAs and the CalRecycle shall make a good faith effort to resolve any data exchange issues in a timely fashion while minimizing the burden on both parties. In the event an issue cannot be resolved by the LEA and SWIS DIP Program staff, the Director of CalRecycle's Waste Compliance and Mitigation Program will be considered the final authority for this program.

2.6 Financial Considerations

LEAs that choose to participate in the voluntary SWIS DIP Program will provide the staff and information technology (IT) resources necessary to participate in the SWIS DIP program. LEAs should consult with LEA Grant Program staff for approval of this type of expenditure.

2.7 Record Retention

All production inspection data accepted from an LEA as being free of errors or incomplete data will be retained by CalRecycle until the inspected solid waste facility has no further interest as a site of environmental interest. CalRecycle anticipates that most solid waste facilities, regardless of their status, would continue to be of environmental interest into the indefinite future.

3.0 Data Stewardship

3.1 Data Ownership

The LEA is responsible for retaining on site records of the solid waste facilities they regulate (14 CCR 18020). Additionally, the LEA is responsible for forwarding copies of inspection records (and any relevant corrections/updates) to the facility operator **and** CalRecycle (14 CCR 18083). CalRecycle in the course of its activities publishes the copies of LEA-supplied inspection data on its Internet site for public access.

3.2 Use and Distribution of Data

All inspection data provided to the CalRecycle in either electronic or paper format is reviewed for accuracy and then made available to the public via [web pages on the CalRecycle Internet site](#). This data is also available for download in Excel and XML format.

3.3 Data Timeliness

LEAs must submit inspections data to CalRecycle within 30 days of the inspection.

3.4 Draft Data Submissions

LEAs may enter inspection records in “Draft” status to allow other LEA staff/managers the opportunity to internally review/approve the inspection before it is submitted to CalRecycle. The SWIS DIP inspection detail web pages include functionality to email a copy of the draft (or final) version of the inspection report to any email address. Draft inspections will not be viewable by CalRecycle staff until the status is set to “Submit to Board.” Inspection records with a “Draft” status will be automatically deleted from the system 45 days after the date of the inspection.

4.0 Agreement Administration

4.1 Period of Agreement / Agreement Termination

The period of this agreement will be from the date the LEA representative signs this document’s cover page until either CalRecycle or the LEA terminate the agreement. Either party can terminate the agreement with 90 days advance notice.

CalRecycle will periodically review the LEA’s participation in the SWIS Digital Inspections Program, both over the course of time and more specifically during the LEA’s evaluation. CalRecycle may choose to terminate an agreement with the LEA if any of these situations arise:

- No representative of the LEA has accessed the program site for at least six months;

- An LEA representative misuses the site;
- An LEA representative does not maintain the security of their CalRecycle WebPass;
- An LEA’s participation in the program over an extended period of time involves excessive amounts of CalRecycle staff time to provide assistance, troubleshooting, problem resolution, etc.

4.2 Agreement Amendments or Revisions

Contacts: The technical or other contacts provided by the LEA on the cover page of this document can be amended by the LEA or the CalRecycle via any type of written request/communication from the LEA’s primary program contact or program director to the CalRecycle. Changing the LEA’s program director or primary program contact requires a written communication from the current program director.

Other Provisions: If other provisions of this agreement are amended by the CalRecycle, the LEA’s primary program contact and program director will receive a written communication from the CalRecycle identifying the change(s). If the LEA does not respond to this communication within the timeframe specified in the written communication, CalRecycle will assume the LEA agrees to the changes.

4.3 Approval Signatures

The [Application](#) must be signed by the LEA’s Program Director (or other representative of similar title and/rank).