Electronic Reporting: Who, How, Where, and Why?

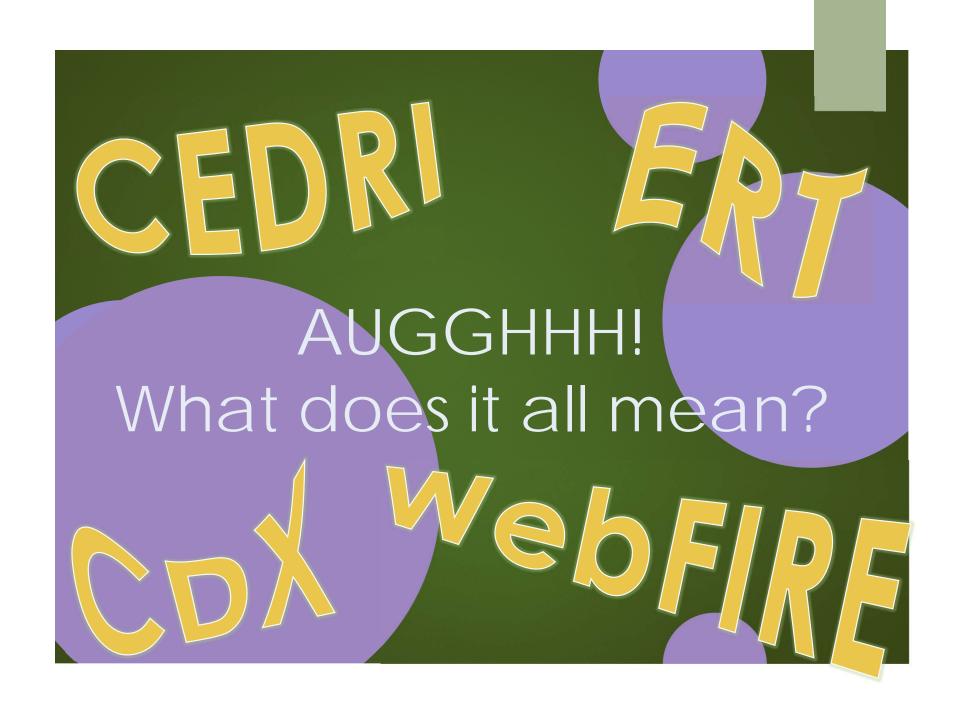
OAQPS - MEASUREMENT POLICY GROUP
GERRI GARWOOD, STEFFAN JOHNSON, COLIN BOSWELL, AND
MICHAEL CIOLEK

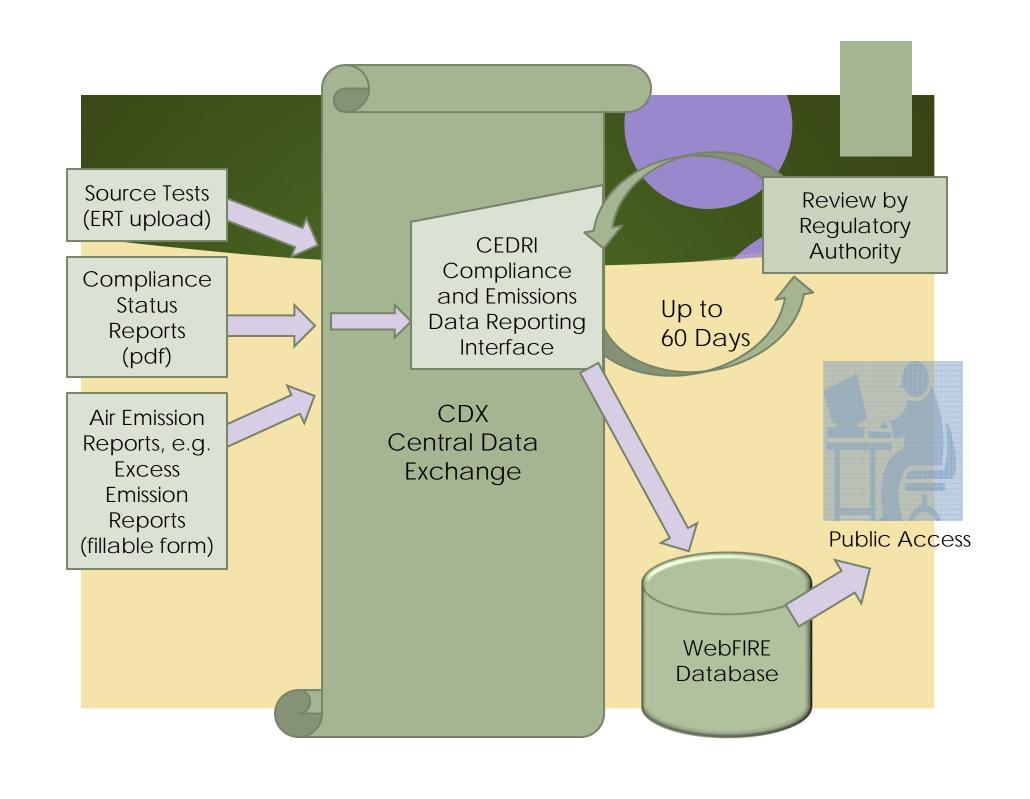


Measurement Technology Workshop January 28, 2015

Topics for Discussion

- Overview of the Process
- Benefits of E-Reporting
- ▶ Rule Development
- ▶ The ERT
- ► CEDRI
- WebFIRE
- ► Final Thoughts





Why does EPA want this data?

- Emission factors revisions
- Emission inventory improvement
- MACT floor development
- Risk and technology review
- Detection limit review
- Control device assessment
- Data sharing

Other Benefits

- Some data will be stored in the system and not need to be entered more than once
- Report standardization
 - Quicker reviews
 - Required elements outlined
 - Imbedded QA checks
- Accessibility
- Federal repository
 - Includes data back-up
 - Reduces hardcopy storage needs



Where are we now?

- ► ERT
 - ▶ 35 Methods (in addition to Methods 1-4)
 - ▶ 3 Performance Specifications
- CEDRI available for report submission
 - ~25 sectors require ERT submissions
 - Some sectors require other reports
- >2700 submissions
 - Includes 460 performance test reports
- Reports searchable in WebFIRE
- New Emissions Factor Procedures
- Email notification for submissions

Where are we heading?

- Propose E-Reporting Rule for Part 60
- Develop E-Reporting Rule for Part 63
- ERT Improvements
- Further develop CEDRI reporting forms
- Develop schema for ERT and subpart specific reports
- Emission factor automation
- ► Enhance links to other EPA data systems

Rule Development

The Electronic Reporting and Recordkeeping Requirements for NSPS Rule

- Has undergone yet another name change
- Scope limited to Part 60
- General Provisions and approximately 75 subparts
- Signature expected soon
- Have started working on Part 63



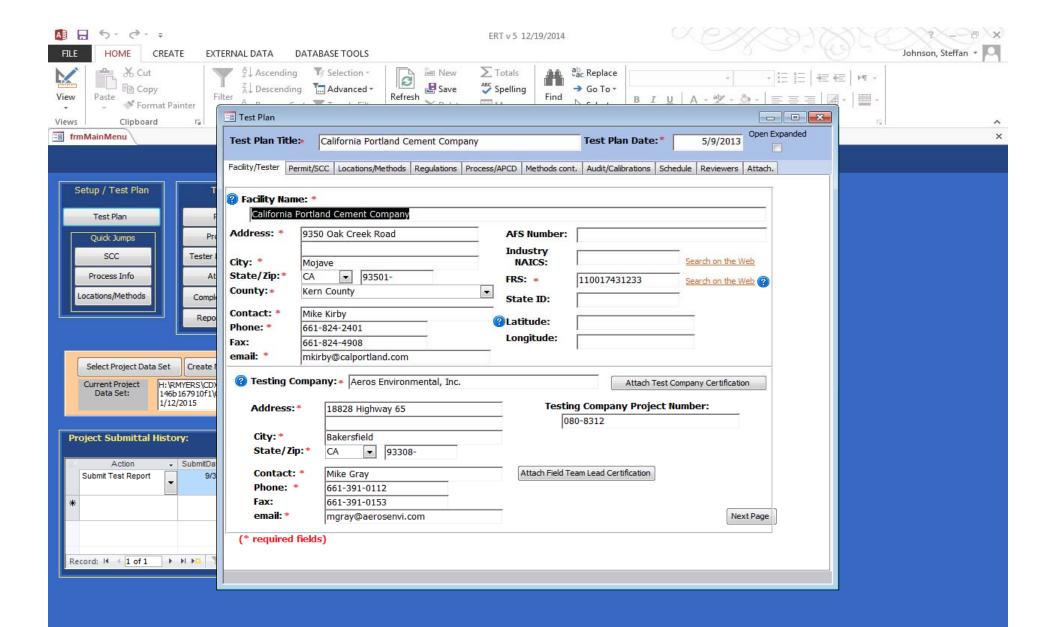
What's in the rule?

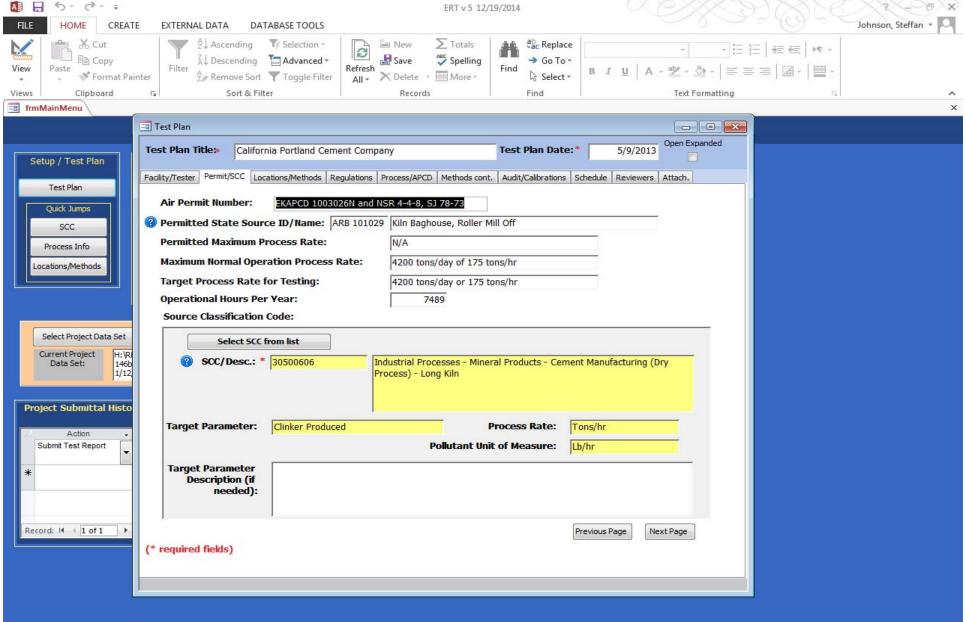
- Covers the following reports
 - Stack tests and CEMS Performance Evaluations
 - Summary Reports and Excess Emission Reports
 - Notification of Compliance Reports
 - Subpart Specific Reports
- Report through CEDRI
- Must also report to the S/L/T office...unless the S/L/T accepts the electronic submission
- Do not have to report to EPA regional office
- Includes e-records in lieu of paper records

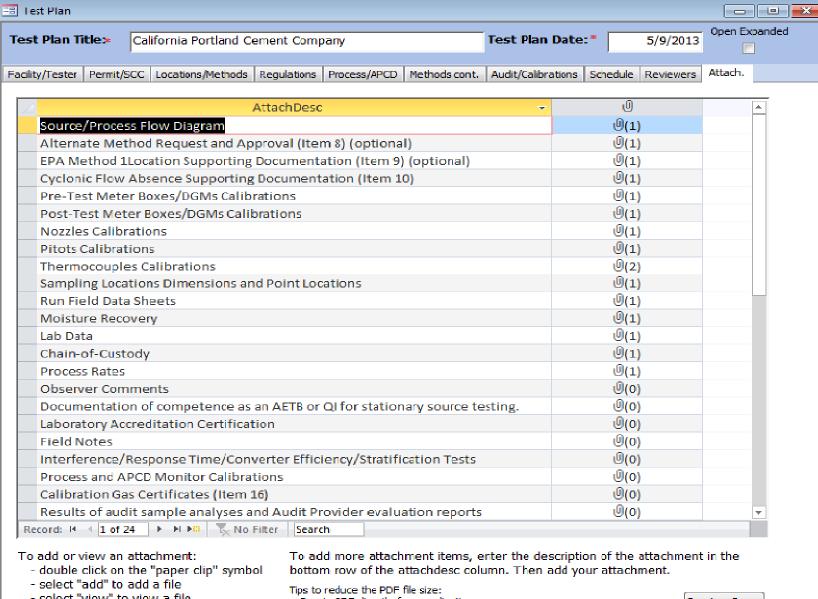


ERT – Electronic Reporting Tool

- MS Access based
- Download: http://www.epa.gov/ttn/chief/ert/index.html
- New Version 5 rolled out December, 2014
- Now accepts EPA Method 30B
- http://www.epa.gov/ttn/chief/ert/ert_info.html





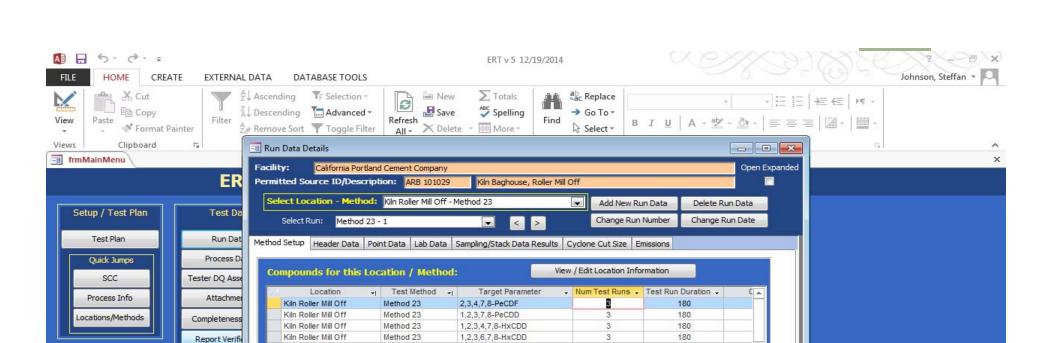


- select "view" to view a file

- Create PDF directly from application,
- Attach individual components not compled material
- Use descriptive file names (i.e. M29-field-data 11-11-11.pdf)
- Attach compressed image files (JPG, GIF, PNG) or CGM
- Scan paper documents at 200 dpi

Previous Page

Finished



Project Submittal History:

Action SubmitDate SubmitDate Submit Test Report 9/3/2013 C

*

Record: Id I of 1 No File N

Select Project Data Set

Current Project

Data Set:

Create New Pro

H:\RMYERS\CDX-Dwnlo

146b167910f1\Californi

1/12/2015

Kiln Roller Mill Off

Method 23

Record: Id 4 1 of 18 Della 1 22 No Filter Search 4 2 2 C 7 0 U-CDE | F| Add Target Parameters Emissions / Concentrations for this Location / Method: Ψ| Units of Measure Ψ Corrε Ψ Corrected % Ψ Local → Method Process Rate, Parameter Kiln Rolle Method 23 lb/hr 0 Kiln Rolle Method 23 ng/dscm 0 Kiln Rolle Method 23 ng/dscm corrected Kiln Rolle Method 23 Add Emissions/Concentrations

1,2,3,7,8,9-HxCDD

OCDD

2.3.7.8-TCDD

Total TEQ

1.2.3.7.8-PeCDF

1.2.3.4.7.8-HxCDF

1,2,3,4,6,7,8-HpCDD

180

180

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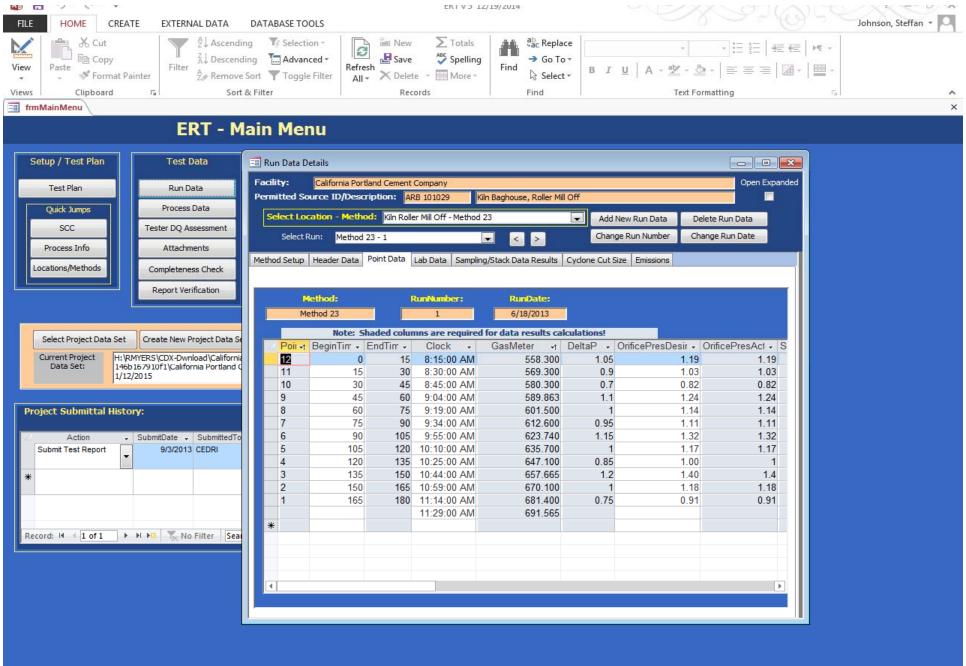
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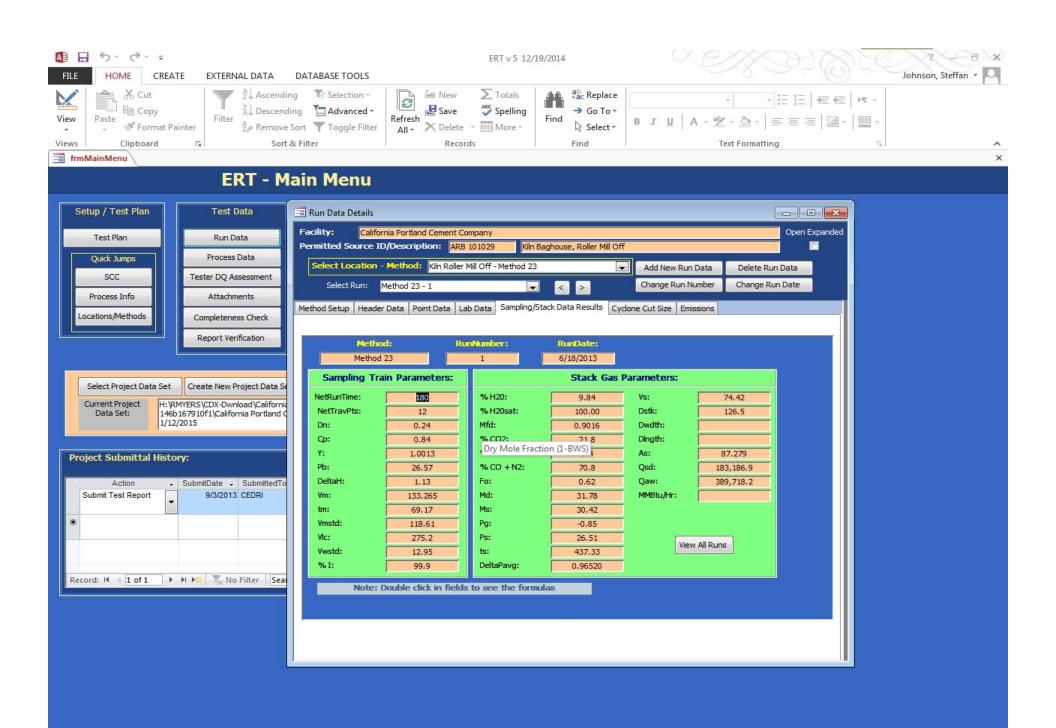
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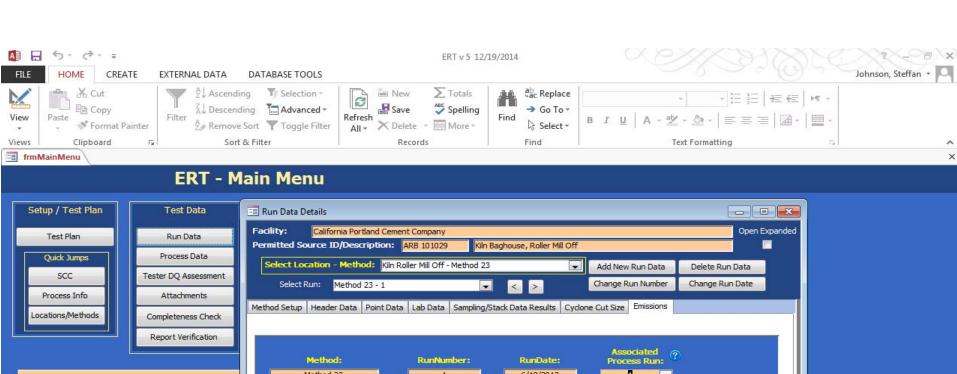
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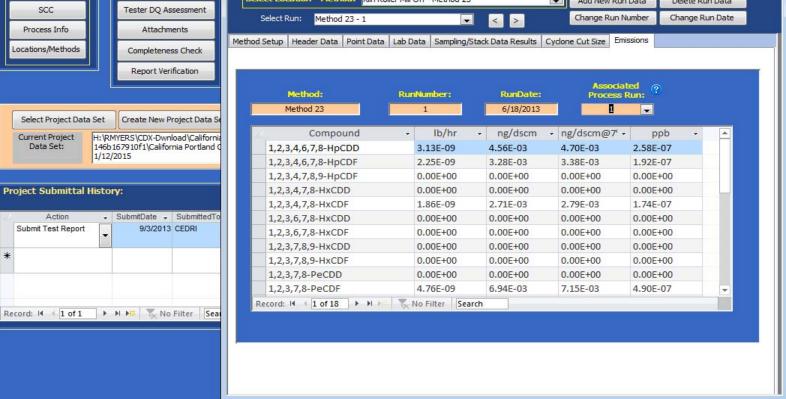
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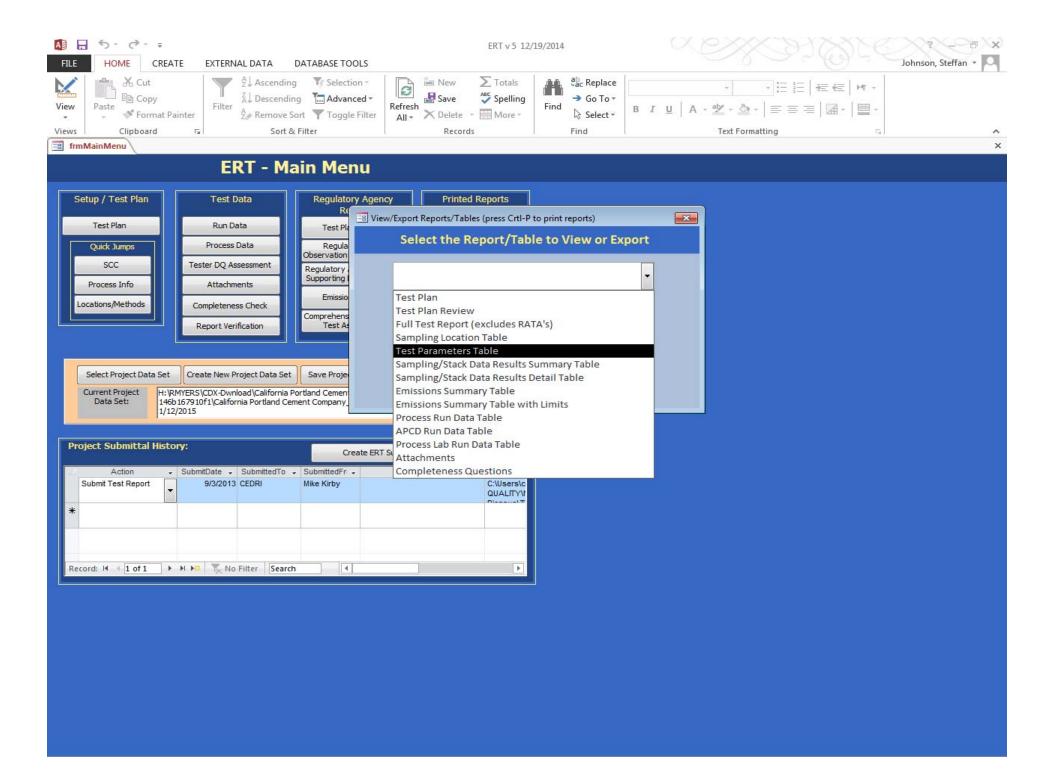
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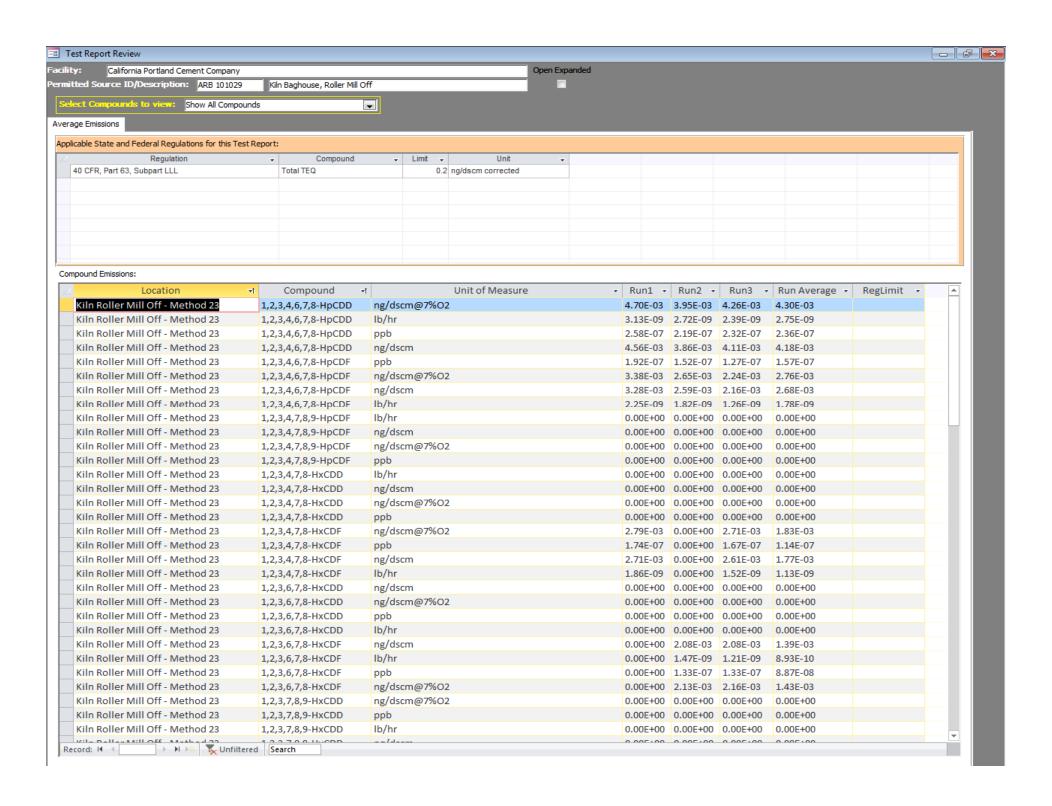












| Test Quality Question | is | | | | | | | - F X |
|--|---|--|--|---|-----------|---|--|----------|
| Quality Assessment Questions | | | | | Open Exp | panded | | |
| | | | | | | | | |
| Completeness | Regulatory Review | | | | | | | |
| Reviewer's Name: | | F | eview Date: | | | | | |
| Regulatory Agency: | | | | | | | | |
| Reviewer's Email: | | | | | | | | |
| Reviewer's Phone: | | | | | | | | |
| Note: The answers and comments associated with the Completeness Questions (salmon shaded cells) are determined by the presence of documentation provided in the test report. Responses made by the applicable regulatory reviewer (rows with no shading of the Question field) will have precedence over automated responses made by the ERT in the Completeness assessment. Comments should be provided to substantiate any determination of sufficiency for the individual questions. The regulatory reviewer may not modify data in the Project Data Set, only anwser the questions and provide comments. | | | | | | | | |
| 4 | | Question | | | Comment - | | | <u> </u> |
| Bodies, does the t field team a QI for | esting firm meet th the type of testing STAC, CARB, NELAP | e criteria as an AETB o conducted? A certifio | etence of Air Emission Testing or is the person in charge of the cate from an independent provides documentation of | | | Review certificate | | |
| Was a representat | tive of the regulator | y agency on site duri | ng the test? | | | Review Regulatory Observer Comments. | | |
| Is a description an | d drawing of test lo | cation provided? | | | | (Test Plan Item 1 and/or Attachment) - Review dimensions and diagram. | | |
| for deviations from tester's assertion t | m the published tes | t method prior to con e not required to obt | y sought and obtained approva ducting the test or that the ain data representative of | I | | (Test Plan Item 8 and Attachment) - Review test method documentation. | | |
| Were all test meth | nod deviations acce | ptable? | | | | (Test Plan Item 8 and Attachment) - Assess deviations and approval documents. | | |
| Is a full description provided? | n of the process and | I the unit being teste | d (including installed controls) | | | (Test Plan Item 7a & 7b & Attachment) - Review process documentation. | | |
| Has a detailed disc operations and the provided? | cussion of source op e representativenes | oerating conditions, a ss of measurements r | ir pollution control device nade during the test been | | | Review description of source operation, APCD operation and sampling for representativeness. (Process Run Data, APCD Run Data, Lab | | |
| Is there document | | ired process monitor | s have been calibrated and that | | | Review process monitor | | ▼ |
| | | | | | | | | |

ERT – Future Features

- Functionality to record/assess cyclonic flow
- Method 2G and 2F
- ▶ Handle process based RATA results
- Add TEQ multipliers to M23
- Add multi-stack capability



CEDRI

- Supports "roles" for users
 - Preparer: Prepares reports for a certifier to sign and submit
 - Certifier: Prepares, edits, and reviews information as well as signs and submits information to the EPA
 - Preparers and Certifiers must be registered for the same organization in order to share reports
- ► Link with Facility Registry System (FRS)
 - Pre-populate already reported data to EPA and to update information
 - Can generate a new FRS ID if needed

CEDRI (cont.)

- Allows users to manage their facility profile under each organization for which they are registered
 - Contractors can be registered for multiple organizations for each one of their clients using the same login credentials.
 - No risk of seeing other client information when the organization approach is used
- Allows facilities to create templates for reporting
 - Streamlines process of submitting reports
 - Users can submit one report package
- ▶ Help E-mail: CEDRI@epa.gov

CEDRI Future Enhancements

- Bulk XML upload of data
 - Users can submit data using a bulk XML data upload
 - Would include the semi-annual compliance report and CEMS/CPMS data for the MATS rule
- Dynamic report creation
 - Streamlined system for creating PDF report of information
- Responsive design (mobile device access)

CEDRI Future Enhancements (cont.)

- Enhanced State reviewer tool
 - Will included notification customization based on location and type of source.
- Link with the Emissions Inventory System
 - Goal is to pre-populate already reported data to EPA and to update information

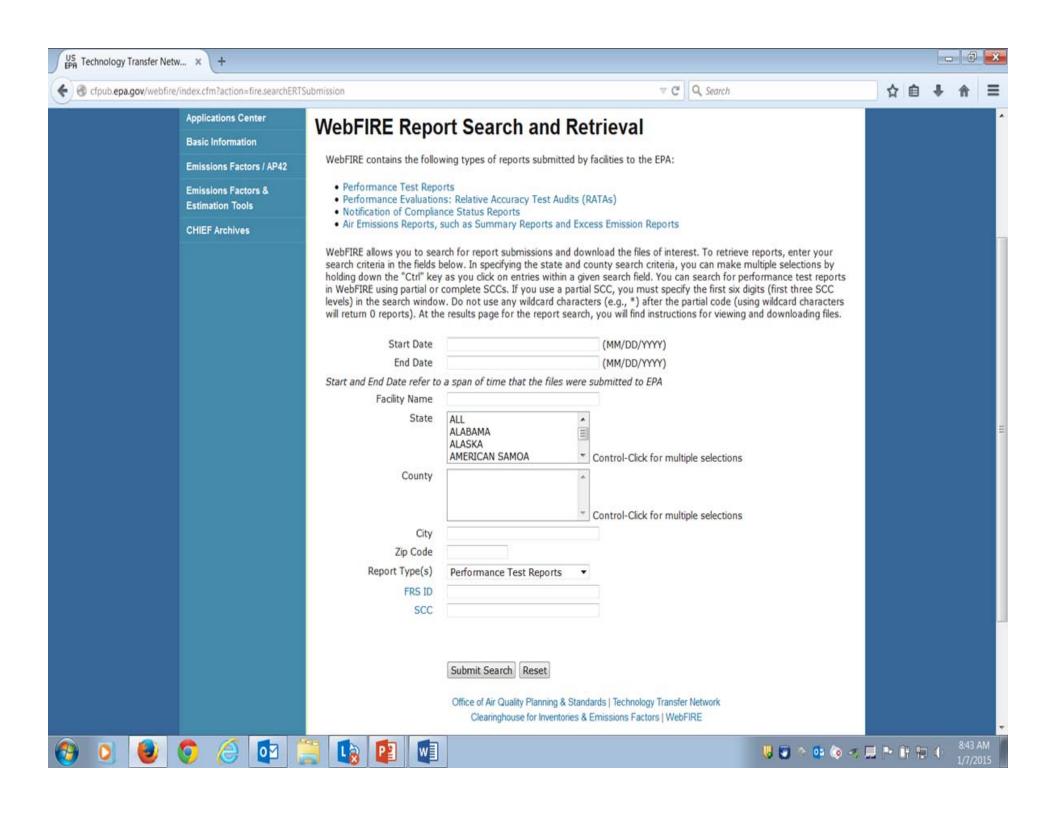


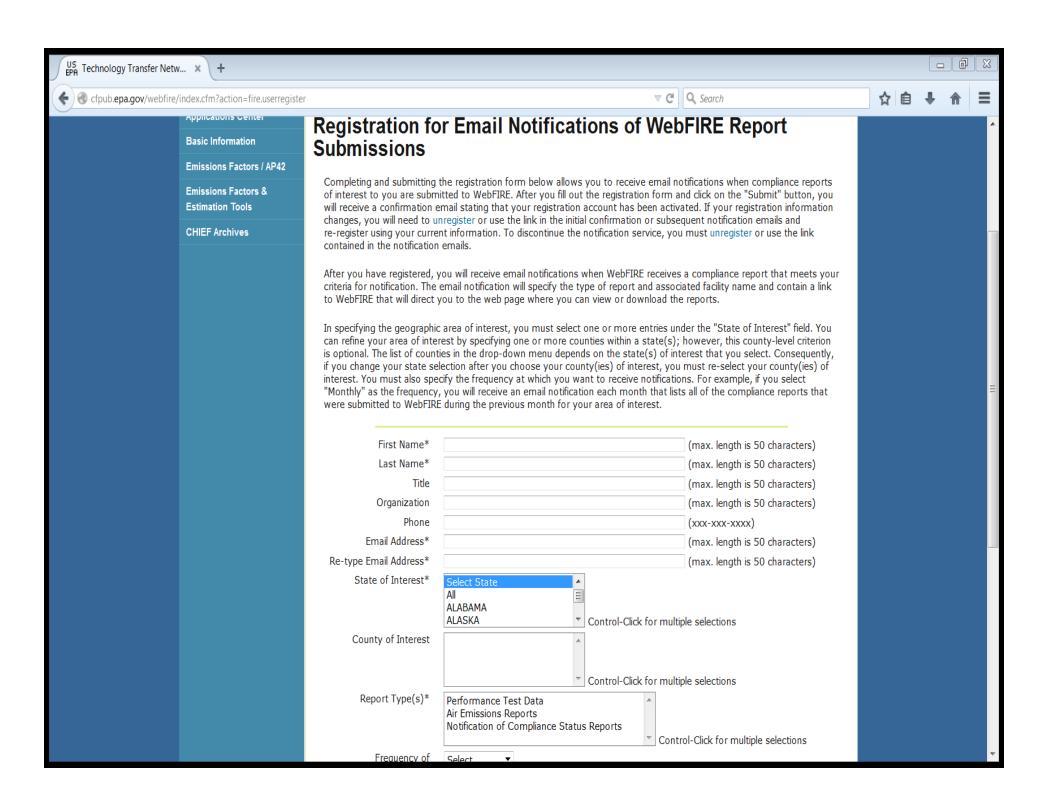
WebFIRE

- WebFIRE's Capabilities
- Recommended Procedures for Development of Emissions Factors and Use of the WebFIRE Database
 - http://www.epa.gov/ttn/chief/efpac/procedures/index.html
- Overview of deriving EPA emissions factors

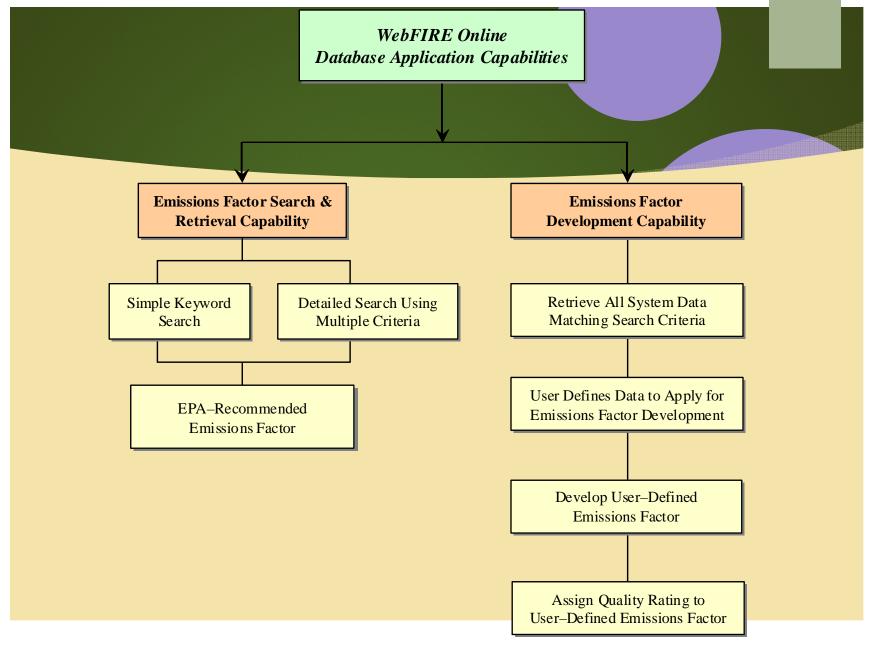
WebFIRE Capabilities

- WebFIRE is EPA's online emissions factor retrieval, repository, and development tool.
- Repository for electronically submitted performance test reports, RATA reports, NOCS, compliance reports (summary/excess emissions)
- Provides search functions for reports received via CEDRI
- Register for email notifications when reports are received in WebFIRE





WebFIRE Emission Factor Overview



EPA's New EF Development Procedures

- Test data collected using the ERT or comparable spreadsheet
- ERT assigns quality rating to the individual test report
- ERT file or comparable spreadsheet submitted to WebFIRE via CEDRI
- Statistical procedures for determining if data is below the method detection limit (MDL)
- Statistical procedures for identifying and removing outliers
- Emission factor derivation and quality assessment
- Statistical procedures for identifying valid data combinations

Final Thoughts

- Electronic reporting is not the future; it's the now.
- Data Quality
 - Variety of purposes for data
 - Completeness
 - Detection limits
- State/Local Buy-in Importance
 - Electronic reporting as a whole
 - Reviewing test reports



Electronic Reporting Recap

- Who
 - > ~25 sectors at the moment
 - Soon most NSPS sources
- ► How
 - ► ERT for performance tests and RATAs
 - ▶ PDF for NOCs
 - Fillable form for air emissions reports
- Where
 - ► CEDRI
- Why
 - It benefits everyone



Questions?

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