

List of “Under Way” and “Under Consideration” Action Items from RBLC Workshops

October 16, 2002

Queries, Results, & Reports

Action Item Description - Queries, Results, Reports	RBLC Workshop	Status / Response
The RBLC is currently a "permit-centric" database, but should be changed to be more "data-centric." Users should be able to search for processes based on their emissions. Only after this might a user be interested in specific permit information.	Chi	Under way. Searches can currently be done by process and pollutant. The results can now be ranked by permit date and the results page now allows users to go straight to process information without having to go through facility information first. We are working to reinstate the ability to rank by stringency of emission limit, which would help identify the most stringent emission limits.
Include better descriptions of the reports rather than "Appendix F" etc (add examples?)		Under way. Descriptions done, working on examples.
Create a separate "Park Service" query routine for early notification entries.	Den	Under consideration. Not needed until NSR Reform rule gets finished.
Make a general text box search option like internet search engines	RTP	Under consideration. Needs more thought/discussion
Include option to query by capacity/size	DC	Under consideration. Needs more thought/discussion.
When a user makes a mistake on the standard query, the user gets a vague "error" message. Add a feature to the query screens that indicates not only that a mistake was made in entering query information, but also indicates specifically where the mistake was made.	Chi	Under consideration. Needs more thought/discussion.

Action Item Description - Queries, Results, Reports	RBLC Workshop	Status / Response
Add a query option or allow results to be ordered by stringency of emission limits.	SF	Under consideration. We are working to restore the ability to rank by stringency of emission limit. We still have to decide how best to achieve the desired result.
Add a feature where queries could be saved for later use using a “cookie” or similar device.	SF	Under consideration. Needs more thought/discussion.

General Functionality/Navigation

Action Item Description - General Functionality/Navigation	RBLC Workshop	Status / Response
Add cascading dropdown lists (flyouts?) to avoid long lists		Under way.
Develop more definitive process codes, especially for gas turbines	Chi	Under way. New codes created for boilers/heaters/furnaces. Turbines and engines should be ready in the next few months.
Move navigation buttons down side rather than across top. (or something else to improve look and feel of buttons)		Under way.
Separate the "New Query" "RBLC Home" and "Query Results" buttons from the "Facility" "Plantwide" "Process" and "Pollutant" buttons	SF	Under way.

Data Entry

Action Item Description - Data Entry	RBLC Workshop	Status / Response
Clarify the difference between "In Process," "Ready for Public Display," and "Ready for QA." Consider including mouseovers with short explanations. Caution that mouseovers may delay page download.	DC	Under way.
Rather than use the terms "New" and "Modified," which are unclear, the data entry form should include a check box for "greenfield site" and "major modification to an existing plant"	Chi	Under way
The data entry form should include a check box to indicate where an emission limit was set more stringent than BACT for reasons outside the usual BACT parameters	Chi	Under way.
Compliance verification should be at the pollutant level rather than the process level.	RTP, Den, Chi	Under way.
Include a field for "test method." Others suggested a check box for "approved test method used" would be sufficient.	DC, Chi	Under consideration. Needs more thought/discussion. Concern about adding too many more data elements.
For "Basis" allow multiple entries such that searching on any entry will pull up the record	Den	Under consideration. Needs more thought/discussion.
Change 250 km to 300 km from Class I areas	Den	Under consideration. Needs more thought/discussion.

Action Item Description - Data Entry	RBLC Workshop	Status / Response
<p>Add BART or BART-like as a choice under "basis" (or provide some mechanism to identify existing source retrofit). Encourage States to enter retrofit determinations.</p>	Den	<p>Under consideration. Retrofit determinations can be entered into RBLC, but RBLC cannot require that they be entered. EPA will look into ways to make a distinction between new sources and retrofits on existing sources in RBLC</p>
<p>Participants felt strongly that the data entry form is too complex and burdensome for State agencies. EPA should explicitly define which fields are required and which are optional. The form should focus on information useful to States in making BACT determinations and eliminate fields that are used only by EPA for statistical purposes. Asking for less would improve the response from States and increase the percentage of permits in the RBLC</p> <p>Some "unnecessary" fields (from the State perspective):</p> <ul style="list-style-type: none"> - whether a public hearing was held - emission increase - number of options considered and option selected - scheduling information <p>One measure of whether a data field could be eliminated would be to check existing entries. Fields that are rarely filled in are good candidates for elimination.</p>	RTP, Chi, SF	<p>Under consideration. Needs more thought/discussion.</p>
<p>Confusion about the term "modification" (e.g., new boiler at existing facility). Confusion about the term "source" (PSD/NSR and NSPS use term differently). What does "emission increase" mean? What does "Plantwide Emissions/Increase Information" mean?</p>	RTP, Chi	<p>Under consideration. These are all questions relating to meanings within the NSR program. They are outside the scope of the RBLC (i.e., it would be too cumbersome to explain the NSR program in the RBLC). We will try to clarify.</p>

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The data entry form should include checkboxes to indicate a range of distances for Class 1 Areas within 250 km of the source	Chi	Under consideration. Needs more thought/discussion.
The data entry form should ask if a fuel is a backup fuel	Chi	Under consideration. May want to include check boxes.
The data entry form should be different for different stages of the permit process, otherwise a data entry person will not know when the form is complete.	Chi	Under consideration. Needs more thought/discussion.
Eliminate NSPS, NESHAP, and all other choices except RACT, BACT, and LAER from the "Basis of Limit" field	Chi	Under consideration. Needs more thought/discussion.
Change "compliance verified, Y/N" to "compliance method required in permit" with check boxes including "CEMS" and "EPA Test Method"	Chi	Under consideration. Needs more thought/discussion.
Who should be able to submit data? Some say anyone should be able to enter. Some say that would make more work for States rather than less. Industry has no incentive to enter data. Vendors would have too much incentive (turn RBLC into an advertisement). Some say only regulatory agency personnel should be allowed to enter data. Alternatively, they should provide extensive oversight.	RTP, Den, Chi, SF	Under consideration. Controversial. Needs more thought/discussion. In general, most people seemed to be against the idea of letting industry and vendors enter data.
Add a field identifying the person responsible for making the compliance determination.	SF	Under consideration. Needs more thought/discussion. Must balance with the comment that EPA already asks for too much information.
Restructure the data entry form so it is similar to Turbo Tax, where the system asks the user questions, then fills out the forms automatically at the end.	SF	Under consideration. Needs more thought/discussion.

Other

Action Item Description - Other	RBLC Workshop	Status / Response
BACT determination guidance (like the recent gas turbine guidance) should be available on the RBLC	DC	Under way.
Add New/Emerging Technology database to RBLC. Check out CARB new technology web site (nutech.org) as an example or a link. Be careful about endorsement. EPA must make sure information is kept up to date (automatic deletion if not updated annually?). EPA should verify that technologies are commercially available. Add a list of industry-specific feasible control technologies with an appropriate disclaimer	DC, Chi	Under way.
When updating SIC to NAICS, keep both in the database	Chi, SF	Under way.
Automatic E-mail to Park Service announcing new entries	Den	Under consideration. Not needed until NSR Reform rule gets finished.
CD Tutorial / Web based Tutorial. Detailed web-based with option to skip. Include audio and video clips, but be careful about bogging down local servers. Web is better than CD because web can be updated easier and eliminates need to mail CDs	RTP, Den, Chi, SF	Under consideration. Needs more thought/discussion.
Cost Information	DC, RTP, Den, Chi, SF	Under consideration. Controversial. Some want it, others do not. Some want more, others want less. Needs more thought/discussion.
Link RBLC permit information to actual permit on State web site	RTP	Under consideration. Difficult to do. Needs more thought/discussion.

Action Item Description - Other	RBLC Workshop	Status / Response
If a new permit is actually a modification to an existing permit, the new permit should refer back to the original permit	RTP	Under consideration. Needs more thought/discussion.
Make links from RBLC to other databases to get further info on a facility (enforcement, emissions, etc)	Den	Under consideration. Needs more thought/discussion.
Add a disclaimer that the RBLC includes data that may not be BACT. Some say industry uses old RBLC entries to justify less stringent BACT limits.	Chi	Under consideration. Needs more thought/discussion. RBLC is a clearinghouse of all PSD/NSR permitting actions. BACT is a case-by-case determination. All RBLC determinations, especially the most stringent, should be considered in the analysis. We will try to add a disclaimer, but that probably won't stop people from misusing the information.