Electronic Reporting for Clean Air Act NSPS and NESHAP Regulations

- Measurement Technology Workshop, January 29, 2013

Major Milestones of E-reporting Program

- 2006 OIG Report *'EPA Can Improve Emissions Factors Development and Management'*
  - Lack of access to stack test reports was a major impediment in developing new/revised emissions factors
  - Committed to develop an electronic system to collect/compile these data
- First version of the Electronic Reporting Tool (ERT) was released in late 2006
- First rule to contain electronic reporting was NSPS for Coal Prep that was published in October, 2009
- E-reporting for MACT/NSPS program began on January 1, 2012

Benefits of E-reporting Program

- Reduces burden of existing paper-based reporting from regulated facilities
- Reduces the cost to industry and EPA of future section 114 Information Collection Requests
- Provides the public with quicker and easier access to emission information
- Provides for more streamlined and accurate state/local review of submitted reports
- Provides timely data to support regulation development, improve emission inventories and emission factors, and allow for improved compliance assurance

Phased Approach to E-reporting

- Phase 1 – As we revise regulations, we are requiring affected sources to electronically submit performance test data
  - The e-reporting of performance test reports is already required in 24 NSPS and NESHAPs affecting 20 source categories

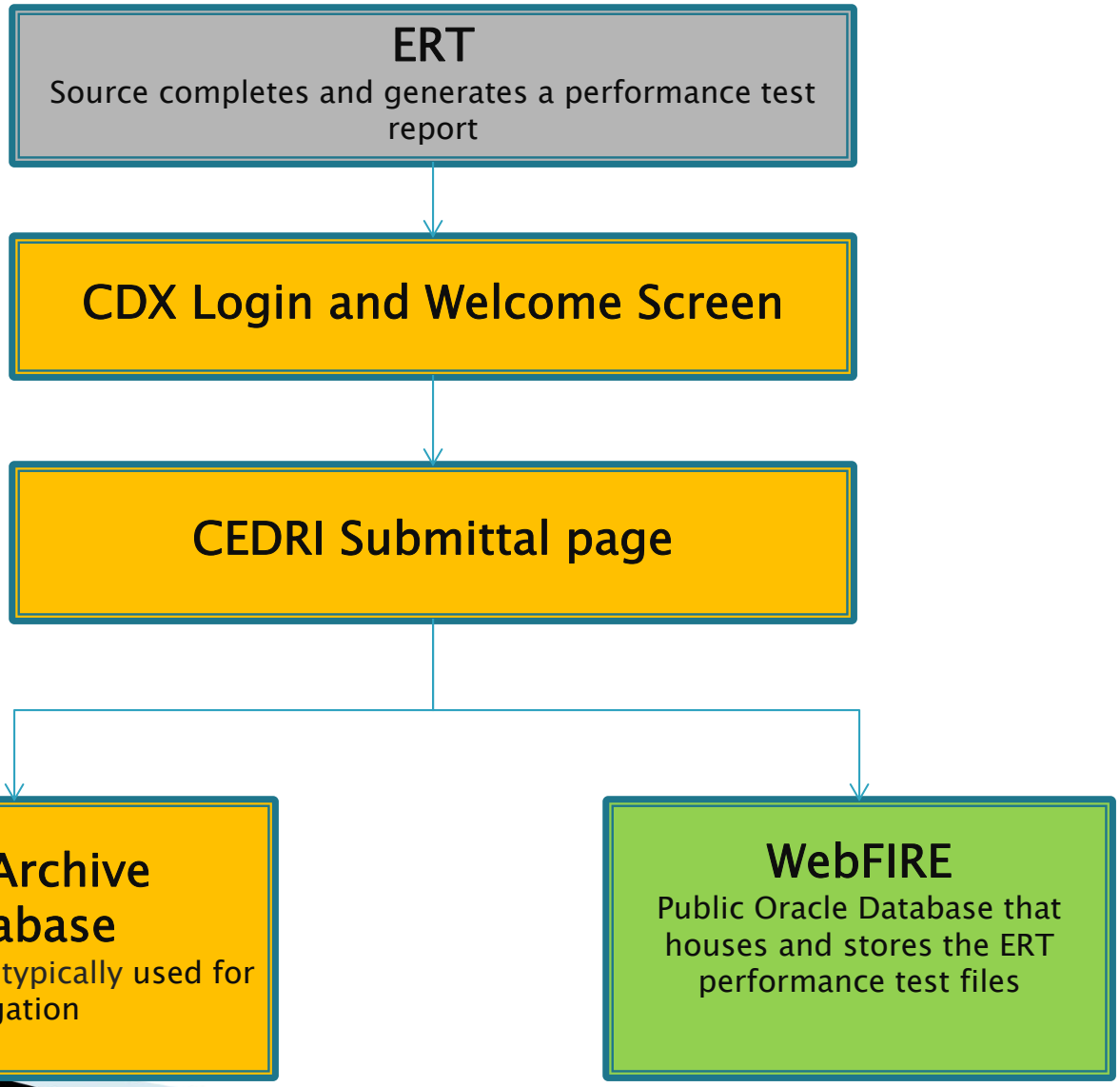
- Phase 2 – We have expanded the information to be reported electronically to include compliance reports, in addition to the performance test reports required as part of Phase 1
  - E-reporting of these reports has been included in a few of our high priority new rules, such as MATS and Boiler MACT

- Phase 3 – We are developing a rulemaking, the Air Data Reporting Rule (ADRR), that will incorporate e-reporting in the majority of our NSPS rules

Data Flows

- Data are submitted by using the Compliance and Emissions Data Reporting Interface (CEDRI) on EPA's Central Data Exchange (CDX)
  - All submitted data are stored in both EPA's Central Data Exchange (CDX) and in WebFIRE
  - We are considering a holding period to allow for S/L review (before reports go public)
- Performance Test Results
  - Sources are required to submit performance test reports via the ERT
  - Only applies if the test method(s) are compatible with the ERT
  - Currently, over 75 stack test reports have been submitted to WebFIRE
- Compliance Reports
  - Compliance reports (excess emissions, summary reports) will be submitted by entering data into web-based reporting templates that are under development
  - Some reports (Notification of Compliance Status reports) will be pdf uploads

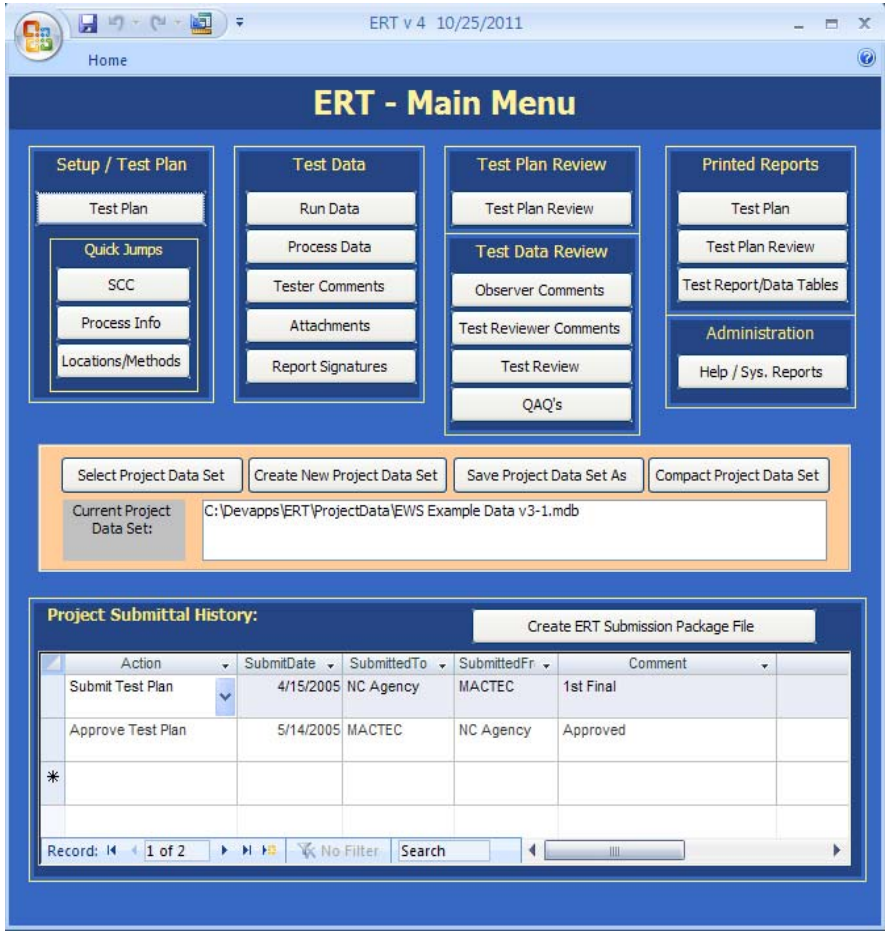
Current Data Flow for ERT Performance Test Reports



Next Steps

- Continue to improve the ERT
- Enhance WebFIRE to allow for storage and easy identification and retrieval of submitted reports
- Develop data flow for compliance reports
- Develop reporting templates for compliance reports
- Develop and publish the ADRR
- Develop links to other data systems (e.g., EIS, AFS) to allow for sharing of information

The ERT



- ERT Webpage: http://www.epa.gov/ttnchie1/ert/index.html
  - FAQs
  - How to install
  - Supported test methods
  - Regulations requiring the ERT
  - Training, Webinars, and User's Guide

➢ You can create a single database for evaluation and analysis of test data – save time vs. manually entering data into a spreadsheet

What's Going in the Regulations?

Sources must submit test reports using the ERT when performance testing is required by the rule and when ERT-compatible method(s) are used.

- ERT-compatible methods can be found on the ERT website.
- Confidential Business Information (CBI): Sources must mail a completed ERT file including the CBI on a compact disk to our CBI office. Sources are also required to submit an ERT file with the CBI omitted through the CDX.

The ERT & Source Classification Codes (SCC)

- SCCs are a required field in the ERT
- Used across the board for many applications
  - To report in EIS
  - To create risk modeling files for NESHAP rules
  - To link emissions factors to their corresponding emission process in Webfire
- OAQPS has an on-going project to update SCC
  - Includes internal (emissions inventory group) and NACAA review
  - Done in a piecemeal fashion – as regulations are finalized

Project Contact: Rachel Agnew

Air Data Reporting Rule (ADRR)

- Proposed rule would revise almost all of the parts 60 NSPS to require industry to e-report performance tests, notification of compliance status, compliance (summary & excess emissions) reports, and other similar reports to EPA
- Original intent was to include Parts 63 and 65, but recent decision was made to phase these in

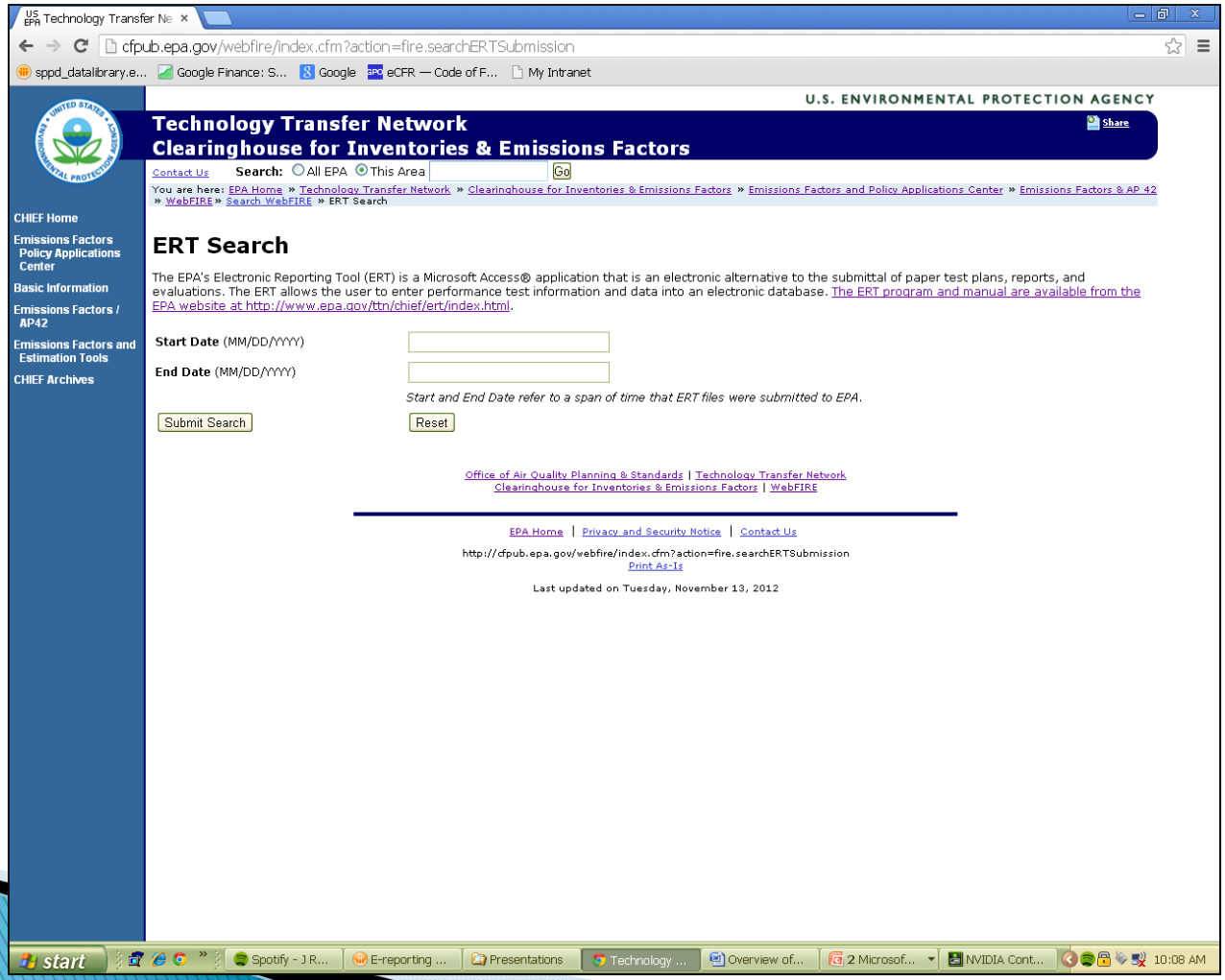
Contact: Tom Driscoll

ADRR, cont'd

- In **some** NSPS and NESHAP, we will require e-reporting of other data and reports, such as CEMS/CPMS data summaries and fence-line monitoring data
- We are not proposing to revise **all** NSPS and NESHAP because some do not currently require any reporting, or have one-time only reporting
  - We work with OAQPS reg writers to improve reporting and add periodic testing requirements (including adding e-reporting) when these regs are reopened
- Expected proposal: May 2013. Promulgation 1 yr. later

WebFire – The Place to Go for Performance Tests & Emissions Factors

- http://cfpub.epa.gov/webfire/



Future Capabilities of WebFire

- Develop new and revise existing emissions factors (EF) from ERT data, including ICR data, via the following:
  - Handling test data below method detection limits
  - Determining and removing statistical outliers
  - Assigning numerical quality ratings (to EF)
  - Statistical procedures for determining valid data combinations
  - Public participation/review

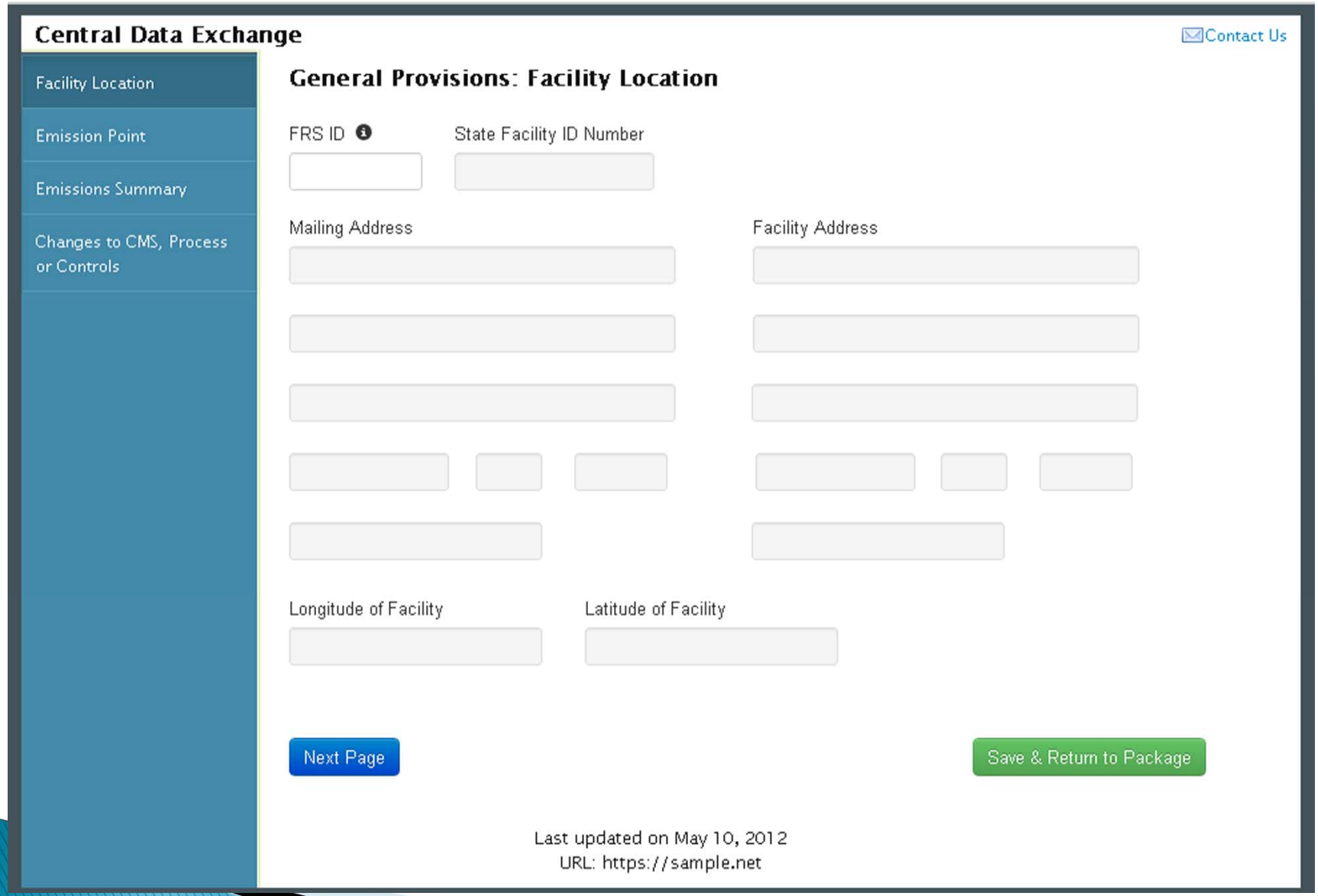
Future Capabilities of WebFire, cont'd

- Option to develop user-defined factors
- Email notifications when ERT data and compliance reports are submitted
- Search and retrieve compliance (notification of compliance, excess emissions and summary) reports

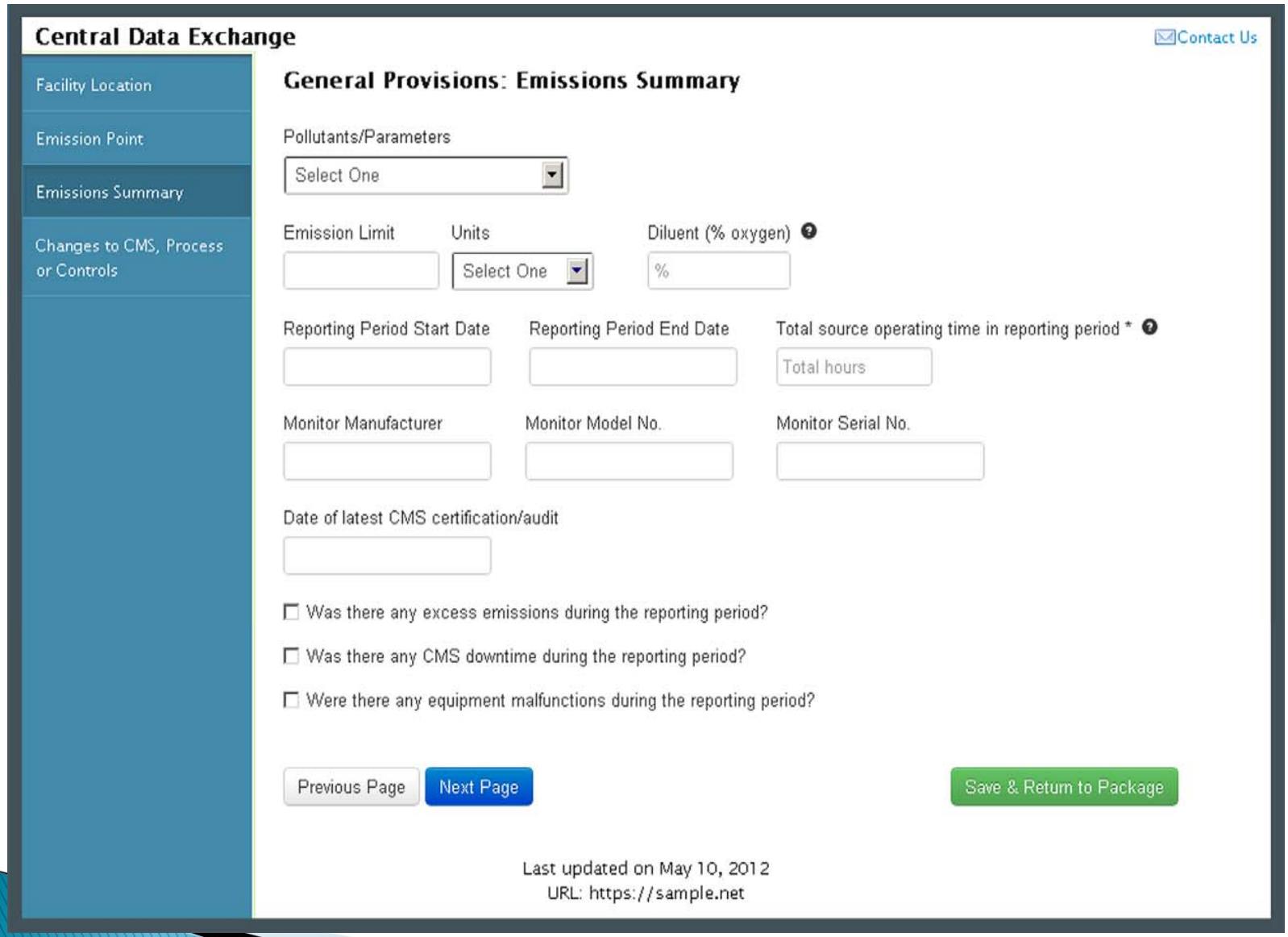
ERT Performance Test Review

- Third Party Review – In development
  - For State/Local agencies only
  - Goal is to make as easy and streamlined as possible
  - Review questions have been developed
  - Scoring would impact emissions factor ratings

Compliance Reports Submittal Website – In development



Compliance Reports Submittal Website – cont'd



Questions?

Contacts:

Electronic Reporting Tool (ERT): Rachel Agnew and Ron Myers
Source Classification Codes (SCC): Rachel Agnew
Webfire: Michael Ciolek
Air Data Reporting Rule: Tom Driscoll
Compliance Report Template Development: Colin Boswell