Air Facility System (AFS) Automatic Unknown Compliance Status Utility

September 30, 2005

The Compliance Monitoring Strategy (CMS) Policy of April 2001 provides a strategic outline for the oversight and management of air stationary sources, with an emphasis on Title V major sources and a limited subset of synthetic minor sources. Part of the policy as implemented includes the ability to maintain an "unknown" compliance status on sources that have not had timely evaluation. AFS was enhanced to include the automatic generation of an unknown compliance status at sources that are identified for evaluation.

The original utility in AFS utilized the CMS Category (CMSC) and the supplied Evaluation Frequency (CMSI) and the date of the last evaluation to generate an unknown compliance status. Also included in the algorithm was the ability to identify plants that had been recently added to AFS or had a change in their CMS category, in order to correctly generate the status. A value of "U" for "Unknown Compliance Status" was generated in the EPA Compliance Status values for plants that have not been evaluated within their indicated frequency, based on a 'rolling window' of time. For example, a major source with the default evaluation period was defined with a CMSC of 'A' and a CMSI of '2'. Unknown compliance at this plant would be generated after 730 days from its last evaluation. The utility used to generate the unknown value runs in two parts: Generation and Un-generation of the unknown value.

The application of the Unknown Compliance Status on a rolling-day window required that the subsequent evaluations had to be held before the next scheduled evaluation otherwise the unknown value would be applied. For example, if a source was evaluated on October 1, 2002, then it would need to be evaluated on or before October 1, 2004 in order to avoid the unknown value. State and Local Agencies requested a review of the utility in order to provide more flexibility in the scheduling of subsequent evaluations.

The utility will be changed effective October 1, 2005. The new utility will not generate the Unknown Compliance Status until the end of a fiscal year in which the plant is scheduled for evaluation. For example, a plant evaluated in January 2003 has a CMSC of "A" and a CMSI (frequency) of 2. The previous utility would use a rolling window of time for the generation of the unknown status, and would generate it in January 2005 if no Full Compliance Evaluation activity has been entered into AFS. Now, state/local agencies would have until the end of FY2005 (September 30, 2005) to evaluate the plant. This provides the State/Local Agency with the flexibility to use the remainder of the fiscal year in which to evaluate the plant.

Additionally, **the generation of Unknown Compliance Status in the new utility will not be run until December of each year** in order to provide a 60-day lag of application, in accordance with the requirements of the recently-renewed Information Collection Request (ICR). During the months of October and November of 2005 the generation of the value will not be run. The un-generation of the unknown value, however, will continue to run monthly.

The attached charts show how the utility will be executed in AFS, additionally, the table below indicates the differences between the utilities.

Utility Features	Old Utility	New Utility
Uses CMSC, CMSI, Default Date of the Latest FCE, CMS Start Date and the current default Compliance Status to generate unknown compliance.	Same.	Same.
Sources already in noncompliance or unknown compliance are not affected	Same	Same
Air Program	Utility used existing air programs, starting with SIP and working downward until an existing air program code was utilized.	Utility will use either the Title V or SIP air program. If Title V is present, it will be used. If not, SIP will be used. If SIP is not present, the utility will generate the SIP air program.
Air Program Pollutant	The unknown value of "U" is generated on the FACIL air program pollutant. If this pollutant is not already present on the plant records, it is generated.	Same as the old utility.
Frequency of Utility	The Generation and Un-generation of the value was originally run each night. Due to Working Capital Fund restrictions, the frequency of the utility was recently changed to a monthly basis.	The generation utility will be run once a month, during the first Thursday of the month, with the exceptions of October and November of each year. This ensures that the values are correctly generated before the OTIS/ECHO extracts from AFS are completed during the second weekend of each month, and before AFS generates monthly historic compliance status values. **At the start of each fiscal year, the generation will be delayed for 60 days (not run during October and November), however, the un-generation will continue on a monthly basis.**

ABC's of Generating an Unknown Compliance status

A = Actual (FY of the latest *A*ctual FCE)

B = Baseline (FY of the *C*urrent date - CMSI)

C = Current (FY of the *C*urrent Date)

If *B* is greater than *A*, then generate unknown compliance

Apply the formula above to these examples to see how the utility will generate Unknown Compliance Status:

Example	Dates of Latest FCE for major sources with a CMSC of A and a CMSI of 2:	With no FCE reported, Unknown Compliance will generate on:
1	February 12, 2004	December 1, 2006
2	July 16, 2005	December 1, 2007
3	September 5, 2004	December 1, 2006
4	October 31, 2004	December 1, 2007
5	December 1, 2004	December 1, 2007
6	July 16, 2003	December 1, 2005

Explanation of Example 1 -

A = FY04 (February 12, 2004)

B = FY05 (October 1, 2006 (FY07) - 2)

C = FY07 (October 1, 2006)

If *B* (FY05) is greater than *A* (FY04), then generate unknown compliance

Explanation of Example 2 -

A = FY05 (July 16, 2005)

B = FY06 (October 1, 2007 (FY08) - 2)

C = FY08 (October 1, 2007)

If *B* (FY06) is greater than *A* (FY05), then generate unknown compliance

Explanation of Example 3 -

A = FY04 (September 5, 2004)

B = FY05 (October 1, 2006 (FY07) - 2)

C = FY07 (October 1, 2006)

If *B* (FY05) is greater than *A* (FY04), then generate unknown compliance

Explanation of Example 4 -

A = FY05 (October 31, 2004)

B = FY06 (October 1, 2007 (FY08) - 2)

C = FY08 (October 1, 2007)

If *B* (FY06) is greater than *A* (FY05), then generate unknown compliance

Explanation of Example 5 -

A = FY05 (December 1, 2004)

B = FY06 (October 1, 2007 (FY08) - 2)

C = FY08 (October 1, 2007)

If *B* (FY06) is greater than *A* (FY05), then generate unknown compliance

Explanation of Example 6 -

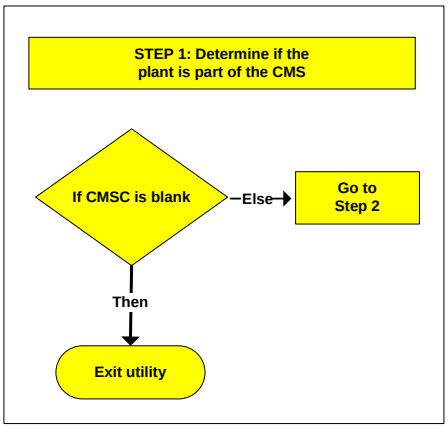
A = FY03 (July 16, 2003)

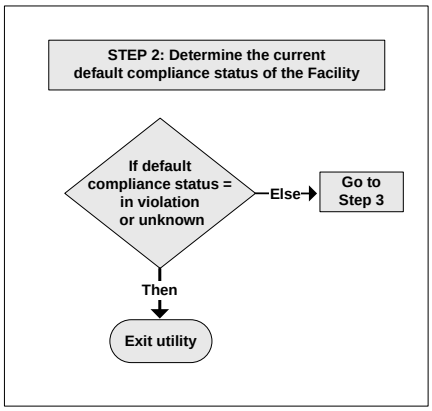
B = FY04 (October 1, 2005 (FY06) - 2)

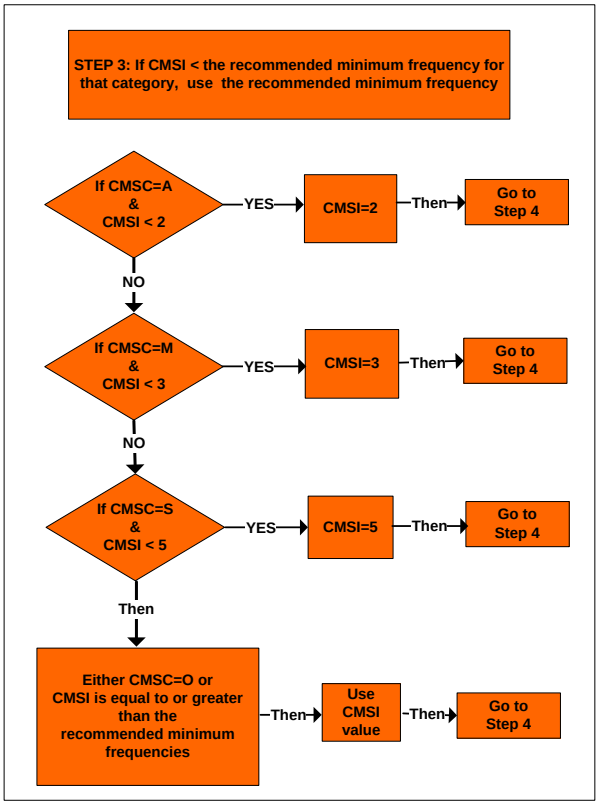
C = FY06 (October 1, 2005)

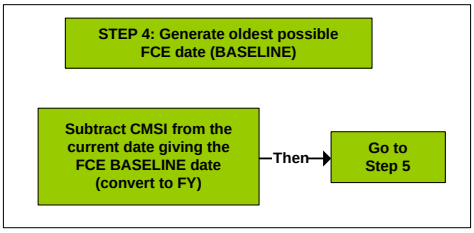
If *B* (FY04) is greater than *A* (FY03), then generate unknown compliance

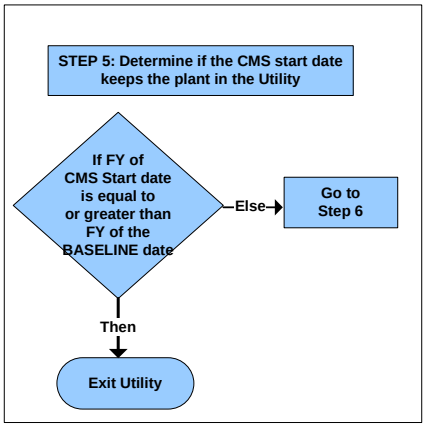
Generate Unknown Compliance Status Utility

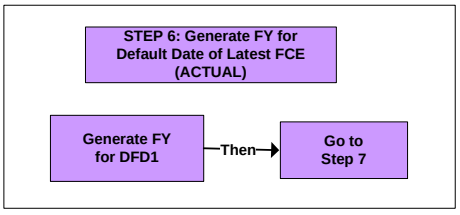


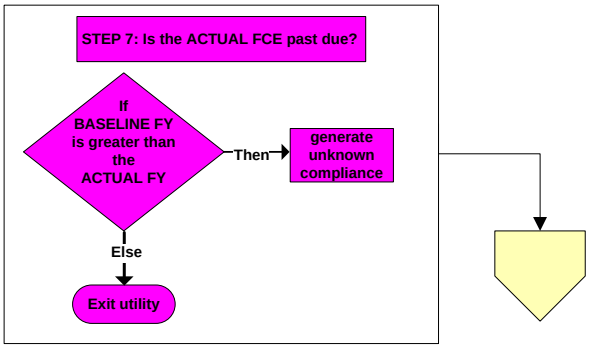




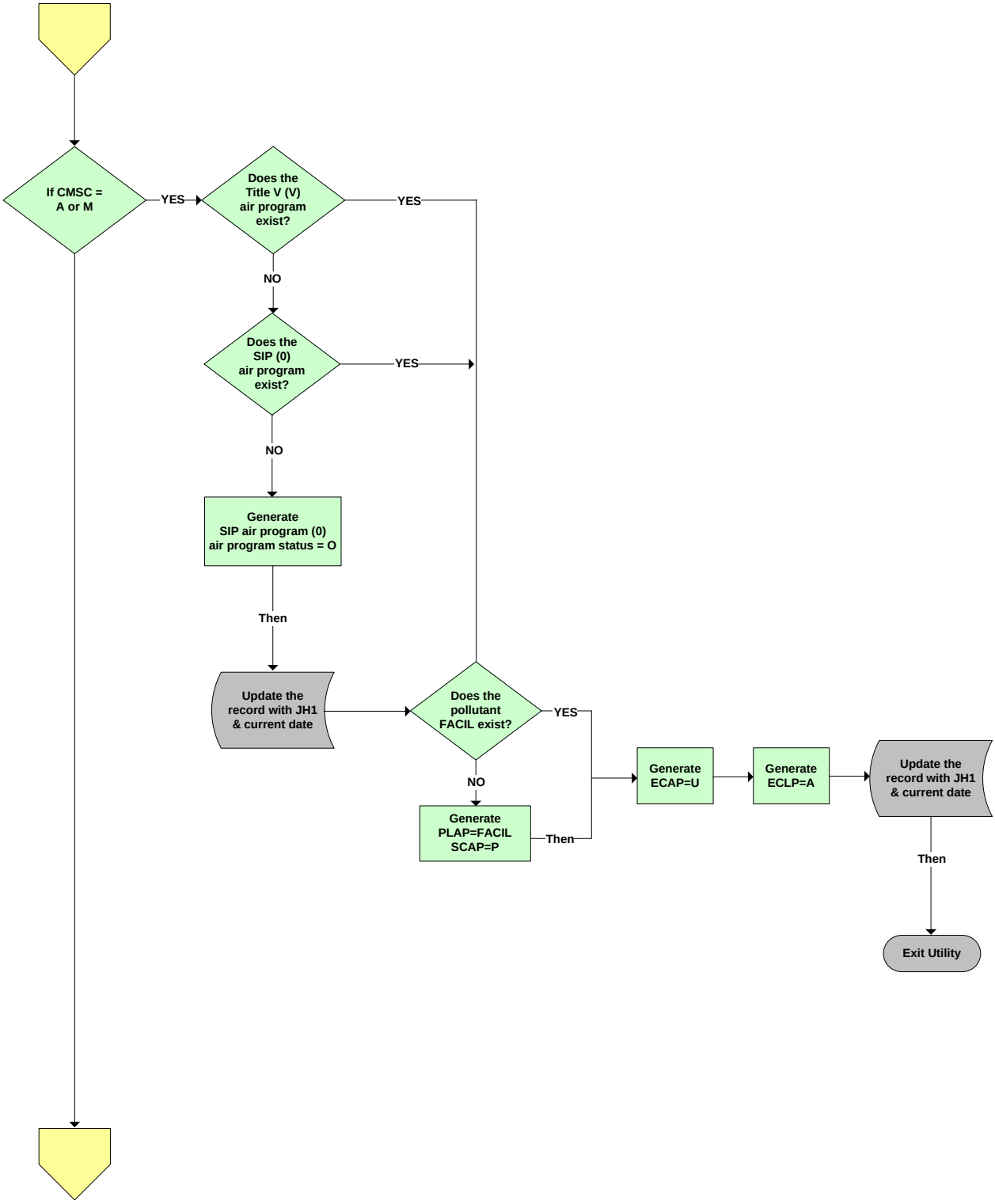


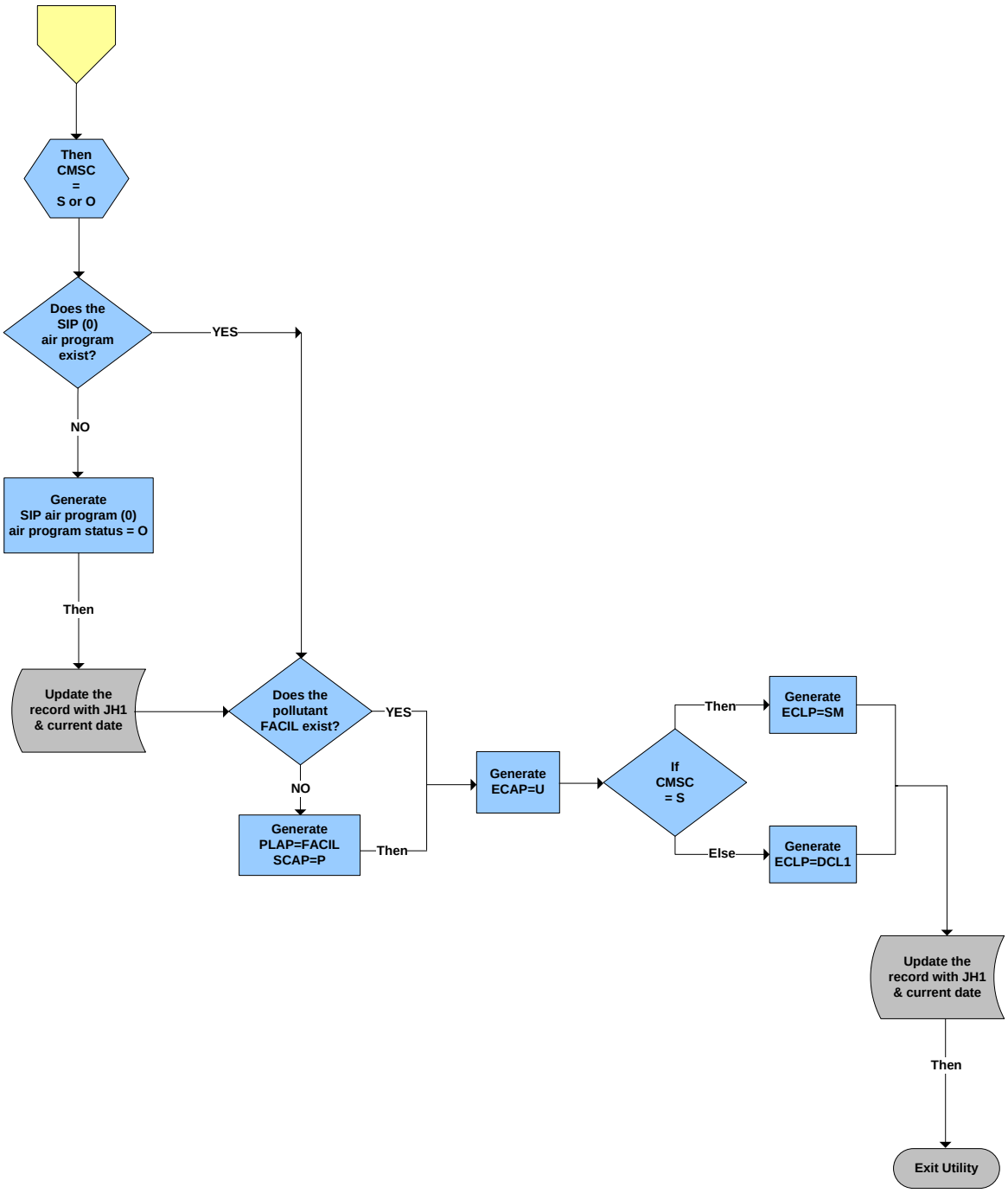
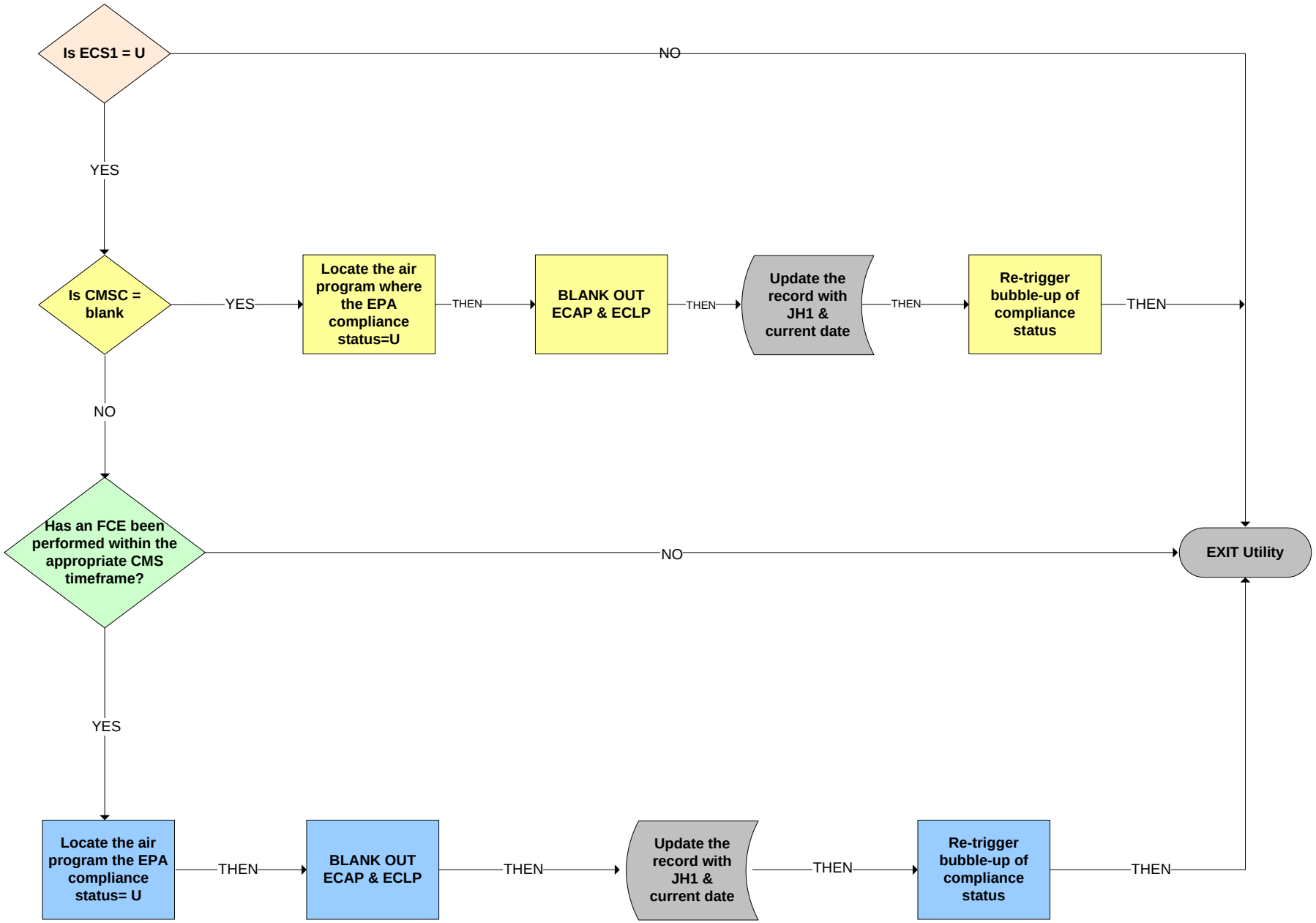






Generate Unknown Compliance Status Utility




Then CMSC = S or O
Does the SIP (0) air program exist?
YES
NO
Generate SIP air program (0) air program status = O
Then
Update the record with JH1 & current date
Does the pollutant FACIL exist?
YES
NO
Generate PLAP=FACIL SCAP=P
Then
Generate ECAP=U
If CMSC = S
Then
Generate ECLP=SM
Else
Generate ECLP=DCL1
Update the record with JH1 & current date
Then
Exit Utility

Ungenerate Unknown Compliance Status Utility