

FY 2010 Data Quality Assurance Review for Michigan under Clean Air Act (CAA)

January 6, 2011

The Air Quality Division (AQD), MDNRE, has completed the data quality assurance review using the OTIS Data Certification Verification process supplied by EPA. The review showed that there was a discrepancy in the number of facilities subject to the Compliance Monitoring Strategy (CMS) policy. The AQD electronically uploaded a CMS batch file to EPA's AFS database system to correct these discrepancies. The AQD also found that many of the Full Compliance Evaluations (FCEs) performed by the AQD were not showing up in OTIS. The AQD has identified those FCEs and are in the process of uploading the data to EPA's AFS database system. The AQD also identified a discrepancy in the number of "operating" major sources and synthetic minor sources. The operating status of these facilities will be updated according to the schedule below.

The AQD will follow the EPA schedule to revise data in OTIS as stated:

- **January 20, 2011** - First Deadline to enter AFS, PCS, and ICIS-NPDES data into the data systems for a final review of the data in OTIS prior to completion of the Data Verification Process.
- **February 10, 2011** - Final Deadline to enter AFS, PCS, and ICIS-NPDES data into the data systems and submit corrections and caveats to EPA for information that will be released on ECHO.

Below are detailed results of the data quality assurance review by AQD.

Metrics Comparisons

Operating Title V Major Source Facilities in OTIS – 467
Operating Title V Major Source Facilities in MACES – 371
Operating SM Optout Facilities in OTIS – 1027
Operating SM Optout Facilities in MACES – 801

The AQD will be doing an electronic batch upload of all major sources and synthetic minor opt out sources operating status before the deadlines stated above. Many major sources and synthetic minor opt out sources in Michigan have permanently closed or reduced their emissions to change their status to minor sources. Also, many major sources previously listed in AFS were combined into one major source based on stationary source definition.

Number of FCEs in OTIS – 397
Number of FCEs in MACES – 452

The FCEs not included in OTIS have been identified and are being electronically batch uploaded to AFS. Sixteen (16) FCEs were identified with a compliance status of "Pending" which were rejected by AFS because the system only accepts compliance or non-compliance status. This issue is being corrected in MACES to only allow compliance or non-compliance status.

Informal Enforcement Actions (violation notices) at CMS sources in OTIS – 120
Informal Enforcement Actions (violation notices) at CMS sources in MACES – 120

No data corrections were necessary for the violation notices.

Federally Reportable Stack Tests in OTIS - 289
Federally Reportable Stack Tests in MACES – 289

No data corrections were necessary for stack test data.

New HPVs with State Lead identified during FY2010 in OTIS - 3
New HPVs with State Lead identified during FY2010 in MACES – 3

No data corrections were necessary for the HPVs or escalated enforcement information.