Overview of the EPA's Proposed Rule:
Electronic Reporting and Recordkeeping Requirements for New Source Performance Standards (NSPS)

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Topics for Discussion
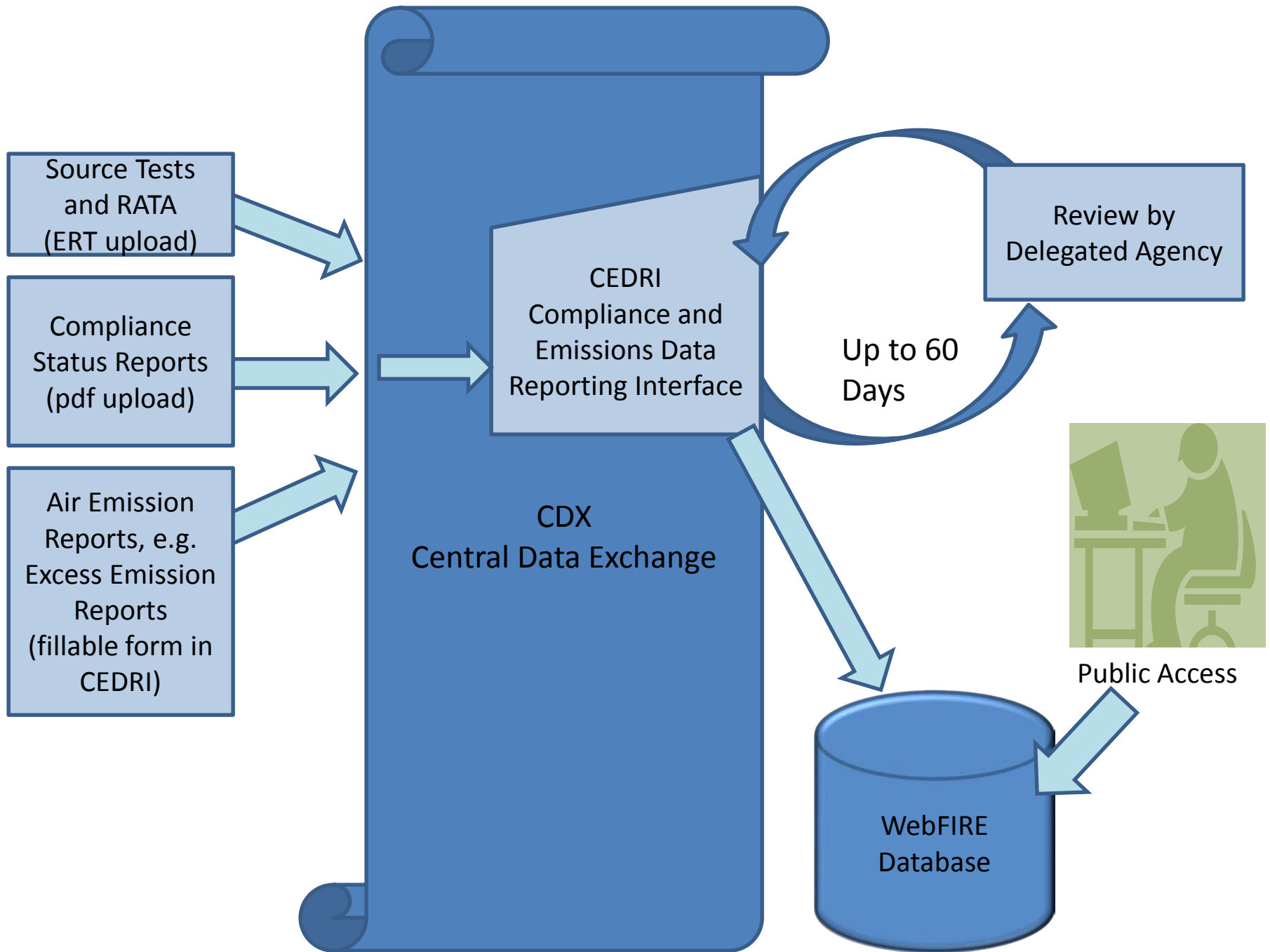
► Overview of the Process

► Where We Are Now

► Information on the Rule

► Benefits of E-Reporting

► Requests for Comment

► Useful Websites

Please note: Because this rule is currently open for comment, the EPA is only allowed to answer clarifying questions.

All comments should be submitted formally through one of the mechanisms described in the preamble of the proposed rule

Overview of the Process

Source Tests and RATA (ERT upload)

Compliance Status Reports (pdf upload)

Air Emission Reports, e.g. Excess Emission Reports (fillable form in CEDRI)

CEDRI Compliance and Emissions Data Reporting Interface

CDX Central Data Exchange

Up to 60 Days

Review by Delegated Agency

Public Access

WebFIRE Database

Where are we now?

► **Electronic Reporting Tool (ERT)**

- ► Version 5 released last year, updated in January
- ► 41 Test Methods
- ► 3 Performance Specifications
- ► Can extract data from tagged Excel spreadsheets

► **Required ERT in Section 114 requests and about 2 dozen rules**

► **CEDRI**

- ► Went live January 1, 2012
- ► Currently accepts ERT files
- ► Currently accepts a limited number of other reports
- ► Can create templates for reporting
- ► Supports submission of multiple reports in one package

More on CEDRI

- ► Supports "roles" for users
  - ► Preparer
  - ► Certifier
  - ► Agency reviewer
- ► Preparers and certifiers must be registered for the same organization in order to share reports
  - ► Preparers and certifiers can each be linked to multiple organizations
  - ► Multiple preparers can be linked to one certifier
  - ► Can only see data for which the preparer and certifier match
- ► Link with Facility Registry System (FRS)
  - ► Pre-populate data
  - ► Generate a new FRS ID if needed
- ► Help is available: cedri@epa.gov

How do I register?

- ► Send a request for registration to cedri@epa.gov
- ► Include this information in the email:
  - ► Name
  - ► Government email address
  - ► Phone number
  - ► Street address
- ► Once registered, receive notifications of submitted reports
  - ► Can be for your whole state/local district or select counties
  - ► Can specify notification frequency

WebFIRE

► Public access site

► Houses electronic reports
  ► ~25 rules with e-reporting
  ► >3000 submissions

► EPA's online emissions factor repository

► Recommended Procedures for Development of Emissions Factors (August 2013)
  ► Test data reported with ERT via CEDRI
  ► ERT assigns test rating to the report
  ► Statistical procedures (MDL, outliers, combinations)
  ► Letter grades changed to representativeness
  ► Recently used in refinery emissions factors
  ► Will be able to create user-defined factors

► Notifications of submissions available

Electronic Reporting and Recordkeeping Requirements for NSPS

Basic Information

- ▶ Proposal published March 20, 2015
- ▶ 60 day comment period
- ▶ General Provisions and approximately 75 subparts
- ▶ Applies to existing sources subject to the NSPS
- ▶ Effective 90 days after promulgation
- ▶ Only reporting format is different
  - ▶ No new data elements
  - ▶ No new reports
  - ▶ No new timeframes

Delegated Agency Impacts

► Reporting and recordkeeping unaffected

► May choose to modify requirements to accept report through CEDRI in lieu of hard copies

► Have full access to reports and associated data as soon as they are submitted

► Does not require purchase of new software or hardware

► Permit revisions

   ► Title V operating permits will likely need revision

   ► Area sources may also need permit revisions

   ► Depending on timing, may be completed as part of a permit renewal

   ► Likely a minor modification

   ► May have other suitable mechanisms for revisions

What's in the rule?

► Covers the following reports
  ► Stack tests and CEMS Performance Evaluations
  ► Summary Reports and Excess Emission Reports
  ► Notification of Compliance Status Reports
  ► Subpart Specific Reports
► Added 40 CFR 60.8(j)
► NSPS that rely on the General Provisions not specifically amended
► Changes for consistency
► Where subpart-specific reports require inclusion of stack test reports, replaced with identifying information:
  ► Process unit
  ► Pollutant tested
  ► Date of test

What's in the rule?

► **Electronic reporting cannot be exempted in delegation agreements**

► **Do not have to report to EPA regional office**

► **Includes e-records in lieu of paper records**

► **Ultimately, each submission stored in two places**

    ► CROMERR COR is retained in CDX

    ► Same file without the CROMERR COR available through WebFIRE

► **Both WebFIRE and CDX:**

    ► Back up their files daily

    ► Have dual back-up systems

The Processing Period

► Time between submittal and public availability

► 60 days for ERT reports

► 30 days for other reports

► EPA/delegated agency reviewers have access through CEDRI

► Source may submit corrections

► If changes are made prior to end of processing period, starts over

► Only the corrected package will be available in WebFIRE

► All versions of submitted reports remain part of the official record

Other report formats

- ► Plan to release XML schema for ERT
- ► Plan to release XML schema for air emissions reports in CEDRI
- ► Will not preapprove third party software
- ► Third party software validated through CEDRI submittal
- ► For CEDRI subpart-specific reports, will be able to upload data instead of filling in the form
- ► Development of a web-based version of the ERT

What if the forms aren't ready?

► Plan to have all fillable forms complete by promulgation

► If CEDRI form not complete, sources continue submitting the way they do now

► 90 days from the date of availability to commence electronic reporting

► During 90 day period may report either hard copy or electronically

► Notice will be sent out through the CHIEF Listserv

► Notice of availability will be added to the CEDRI website

What's not included?

► NSPS that do not require the submission of any of the reports in the rule

► NSPS being addressed under separate rulemakings

► Emission guidelines:

  ► Prevent burden to delegated agencies

  ► Will address as they are opened for other changes

  ► Delegated agencies may choose to revise and submit state plans to incorporate proposed electronic reporting requirements

  ► Plan to address electronic reporting in the Federal Plans that implement the emission guidelines

Electronic Reporting Benefits

► The EPA believes that the electronic submittal of the reports addressed in this proposed rulemaking:

  ► Will increase the usefulness of the data contained in those reports

  ► Is in keeping with current trends in data availability

  ► Will further assist in the protection of public health and the environment

  ► Ultimately results in less burden on the regulated community

► Universally considered to be faster, more efficient and more accurate for all parties once the initial systems have been established and start-up costs completed

Why does EPA want this data?

► Emission factors revisions

► Emission inventory improvement

► MACT floor development

► Risk and technology review

► Control device assessment

► Detection limit review

Benefits to Air Agencies

► Report standardization
  - ► Quicker reviews
  - ► Faster response to violations
  - ► More complete data
  - ► Imbedded QA checks
  - ► Software "search" options
  - ► Ability to download and analyze data in spreadsheets
► Federal repository
  - ► Includes data back-up
  - ► Reduces hardcopy storage needs/costs
► Accessibility
► Improved emissions factors/inventories
► Reduced requests for information

Benefits to Regulated Entities

- ► Reduced data entry
- ► Report standardization
  - ► Required elements outlined
  - ► Imbedded QA checks
- ► Minimize duplicative reporting
- ► Improved emissions factors
- ► Improved inventories
- ► Section 114 requests
  - ► Decrease in number
  - ► Less extensive
- ► Maintenance and storage of paper records
- ► Overall estimated savings: $300,000 per year

Benefits to the Public

▶ Improved inventories

▶ Quicker reviews

  ▶ Delegated agency compliance reviews

  ▶ CAA-required technology and risk reviews

▶ Accessibility

Requests for Comments

► Submission of data not already required

► Creation of web-based ERT

► Lack of access to computers and the Internet

► Electronic recordkeeping in lieu of paper

► Impacts on small businesses

► Comments from states, locals, and tribes

► Long-term emissions data/process data

Websites of Interest

► CDX

http://www.epa.gov/cdx

► ERT

http://www.epa.gov/ttn/chief/ert/index.html

► CEDRI

http://www.epa.gov/ttn/chief/cedri/index.html

► WebFIRE

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

► Emissions Factor Procedures

http://www.epa.gov/ttn/chief/efpac/procedures/index.html

► CHIEF listserv

http://www.epa.gov/ttn/chief/listserv.html#chief

Questions?

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