

Electronic Reporting and Online Data Availability

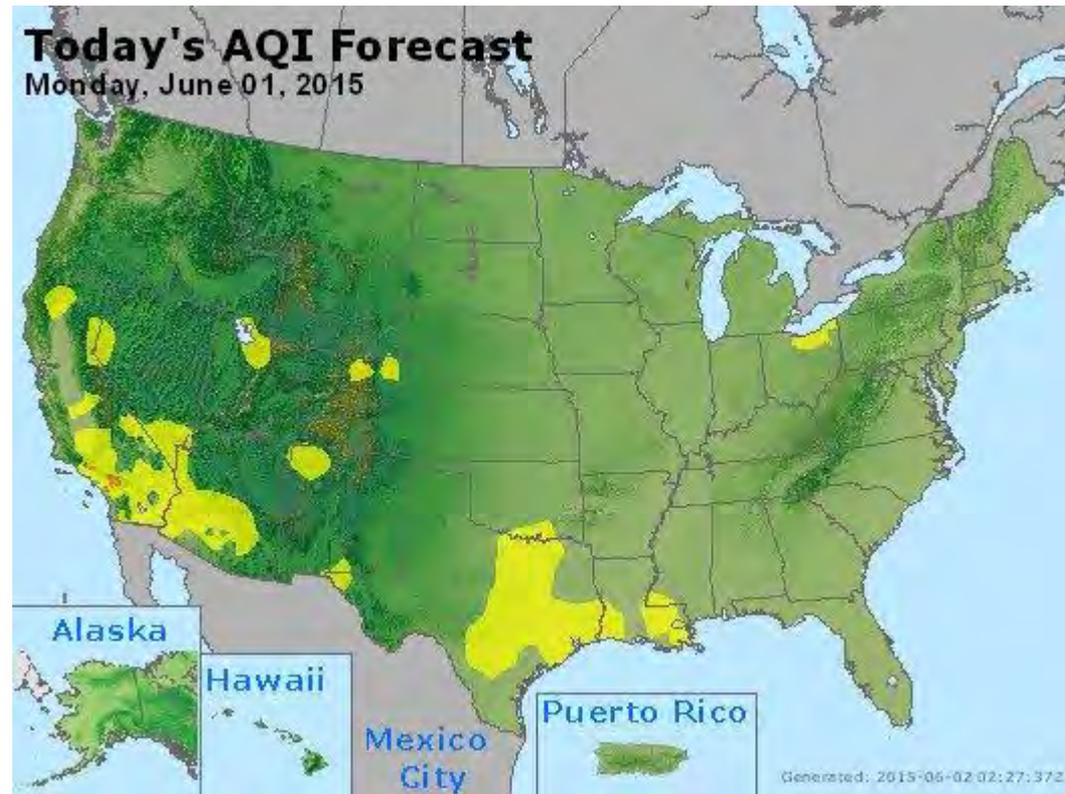
Here to stay and more to come...

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CIBO Quarterly Meeting

Agenda

- Background on E-reporting and EPA activities
- ERT, CEDRI, WebFire
- ECHO
- NEI
- NATA
- Summary/
What it means to you



What is Electronic Reporting?

- It does not mean sending your reports in via e-mail.
- E-reporting is using EPA's Central Data Exchange (CDX) to submit compliance information. You already do this for reports like TRI and you will be submitting Boiler MACT reports through CEDRI.
- EPA's e-reporting initiative involves revising NSPS and MACT rules to require electronic reporting of certain information to EPA , including
 - Performance test reports
 - Compliance reports (e.g., excess emissions, notifications, semi-annual reports, monitoring data summaries, etc)

Major Milestones of EPA E-reporting Program

- 2006 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

EPA's Stated Goals

- Reduces burden of existing paper-based reporting from regulated facilities
- Reduces the cost to industry and EPA of future section 114 Information Collection Requests (e.g., 8-year review)
- **Provides the public with quicker and easier access to 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

EPA Taking a “Phased” Approach to E-reporting

- Began requiring ERT entry of test data for MACT ICRs
- As EPA is revising regulations they are requiring ERT submittal of test data
- EPA has begun requiring e-reporting of compliance reports (some will be pdf uploads)
- EPA March 2015 proposal to add e-reporting to several NSPS (states can still ask for paper)
 - Proposed only 90 day transition period to e-reporting once templates available online

Electronic Reporting Tool (ERT)

- ▶ ERT is a Microsoft® Access application that:
 - ▶ Generates an electronic report which can be submitted using CEDRI
 - ▶ Documents key information and procedures required by most of the existing EPA federal test methods
 - ▶ Facilitates coordination among the source, the test contractor and the regulatory agency in planning and preparing for the emissions test
 - ▶ Provides for consistent criteria to quantitatively characterize the quality of the data collected during the emissions test
 - ▶ Standardizes the reports
 - ▶ Provides for future capabilities to electronically exchange information in the reports with facility, state or federal data systems
- ▶ Only used to report performance test and performance evaluations (RATA)
- ▶ ERT is a work in progress – we are making improvements to respond to user comments and plan to add new test methods as resources allow
- ▶ A description of the ERT can be found at:
<http://www.epa.gov/ttn/chief/ert/index.html>

Only Certain Test Methods are Supported by ERT:

Methods 1 through 4

Method 3A

Method 5, 5 @ 320F

Methods 5B and 5F

Method 5G

Method 6C

Method 7E

Method 8

Method 10

Method 12

Methods 13A and 13B

Method 17

Method 23

Method 25A

Method 26

Method 26A

Method 29

Method 30B

Method 101

Method 101A

Method 102

Method 103

Method 104

Method 108

Method 201A

Method 202

Method 0011

Method 0061

Method 306, 306A

Method 315

Method 316

CT Method 39

CARB Method 428

CARB Method 429

Performance Specification 2

Performance Specification 3

Performance Specification 4

Issues with ERT

- It takes time to learn it, there are a couple hours worth of webinars about it on the EPA website.
- It doesn't accommodate all test methods, so it can't be fully used to upload new data into WebFire and improve emission factors
- The report isn't pretty – you probably still want a nice test report to put on your bookshelf like you've always had, so it isn't saving any money for anyone
- It still has bugs and will crash
- CBI: Sources must mail a completed ERT file including the CBI on a CD to EPA CBI office. Sources are also required to submit an ERT file with the CBI omitted through the CDX.

CEDRI – Compliance and Emissions Data Reporting Interface

- Accessed through the CDX, <https://cdx.epa.gov/>.
- Data portal for submittal of compliance information to EPA.

The CEDRI program service supports the submittal of three types of reporting:

- **Performance Test Reports** – Performance Test Reports use the **Electronic Reporting Tool (ERT)**, built in Microsoft Access, to generate files containing emissions source test data. Facilities upload these files to CDX using CEDRI.
- **Notification Reports** – A Notification Report or Notification of Compliance Status (NCOS) are reports typically submitted by a regulated facility that notifies the designated authority that the facility has achieved compliance with an applicable regulation. (Note: In CEDRI some Notification Reports will be uploaded in PDF form.)
- **Air Emissions Reports** – Air emissions reports are periodic reports submitted to the delegated authority after the facility achieves initial compliance that demonstrate that the facility has maintained continuous compliance with an applicable regulation over the reporting period (e.g., 6 months).

WebFIRE

- ▶ Publically accessible Oracle database that currently stores submitted performance test reports and EPA recommended emissions factors
- ▶ Planned enhancements include:
 - ▶ Expanding to store compliance reports that are submitted electronically
 - ▶ Developing an automatic notification system to alert S/L agencies when reports are received
 - ▶ Expanding users ability to search the stored data
 - ▶ Reprogramming to automatically recalculate emissions factors once new test data is submitted
- ▶ A description of the WebFIRE database is available at:
<http://cfpub.epa.gov/oarweb/index.cfm?action=fire.main>
 - [Search for emissions factors](#)
 - [Search for reports](#)
 - [Register for email notifications](#)
 - [Download WebFIRE data in bulk](#)

Boiler MACT, ERT, and CEDRI

§ 63.7550 What reports must I submit and when?

(1) Within 60 days after the date of completing each performance test (defined in § 63.2) as required by this subpart you must submit the results of the performance tests, including any associated fuel analyses, required by this subpart and the compliance reports required in § 63.7550(b) to the EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of the EPA's Electronic Reporting Tool

(2) Within 60 days after the date of completing each CEMS performance evaluation test (defined in 63.2) you must submit the relative accuracy test audit (RATA) data to the EPA's Central Data Exchange by using CEDRI as

(3) You must submit all reports required by Table 9 of this subpart electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due the report you must submit the report to the Administrator at the appropriate address listed in § 63.13. At the discretion of the Administrator, you must also submit these reports, to the Administrator in the format specified by the Administrator.

EPA Contacts for More Information

Electronic Reporting Tool (ERT): Steffan Johnson
(AMEC - Paul Baker 919-474-3544)

Webfire: Michael Ciolek

Air Data Reporting Rule: Gerri Garwood

Compliance Report Template Development: Colin Boswell

What's ECHO?

– **Enforcement and Compliance History Online**

- Integrated Compliance and Enforcement Information
 - Permit Data
 - Inspection Dates and Findings
 - Violations
 - Enforcement Actions
 - Penalties Assessed
-
- May 2015: EPA released ECHO Version 2.4, featuring updated Clean Air Act stationary source data and a tailored search interface.

ECHO Enforcement and Compliance History Online

[Log In](#) [Contact Us](#)



Search Community



Explore Facilities

Search Community

Use EPA's Enforcement and Compliance History Online website to search for facilities in your community to assess their compliance with environmental regulations. You can also investigate pollution sources, examine and create enforcement-related maps, or explore your state's performance. [Learn more about ECHO](#)

Quick Search

 [Tutorial](#) [More Search Options](#)



Create Maps



Analyze Trends

Latest News

ECHO News

- ▶ [Version 2.4 with Updated Air Data Launched!](#)
- ▶ [What's New in ECHO](#)
- ▶ [ECHO Training: June 2](#)
- ▶ [Join the ECHO Listserv](#)



Help



Resources



Advanced Tools

Look at dashboards that analyze national trends

National Air Performance Dashboard



Search on your zip code and find lots of info

Search Statistics

20 Search Results

- 1 Facilities with a Current Violation/s
- 4 Facilities with Violations in the Last Three Years
- 2 Facilities with Formal Enforcement Actions in the Last Five Years
- 5 CAA Sources
- 11 Facilities with CWA Permits
- 8 Facilities with RCRA IDs
- 0 Facilities with TRI Releases

Find your facility's information

Enforcement and Compliance Summary

Statute	Insp (5 Years)	Date of Last Inspection	Current Compliance Status	Qtrs in NC (of 12)	Qtrs in Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)
CAA	4	04/29/2014	Significant Violation	12	12		
CWA	5	07/01/2013	Significant Violation	4	3	2	
RCRA			No Violation	0	0		

[Go To Enforcement/Compliance Details](#)

Related Reports:  [CWA Effluent Charts](#)  [CWA Pollutant Loading Report](#)  [Enforcement Case Report](#)

- Permit Data
- Inspection Dates and Findings
- Violations
- Enforcement Actions
- Penalties Assessed

Review your facility's info and report data errors as applicable.

 [Report Data Error](#)

National Emissions Inventory - NEI

- When you send your annual air emissions inventory report to your state, they upload it to the National Emissions Inventory (NEI).
- EPA publishes the NEI every 3 years (current is 2011).
- Online and searchable/downloadable at <http://www.epa.gov/ttn/chief/eiinformation.html>
- Data quality varies – states have different requirements for reporting, error is introduced, etc.

Emission Inventory Data

- [2011 NEI Data](#)
- [2008 NEI Data](#)
- [2005 NEI Data](#)
- [2002 NEI Data](#)
- [Earlier Year Summaries](#)
- [NEI Emission Trends Data](#)
- [Canada](#)
- [Mexico](#)

Plans and Documentation

- [2014 NEI Documentation](#)
- [2011 NEI Documentation](#)
- [2008 NEI Documentation](#)
- [2005 NEI Documentation](#)
- [2002 NEI Documentation](#)
- [1999 NEI Documentation](#)

Data Analysis

- [2011 NEI Report](#)
- [2008 NEI Report](#)
- [2002 NEI Booklet](#)
- [Air Emission Sources \(Maps & Charts\)](#)

Related Inventory Links

- [AIR Data Web site](#)
- [Annual Air Quality Trends Report](#)
- [National-Scale Air Toxics Assessment \(NATA\)](#)
- [Greenhouse Gas Emissions](#)
- [PM2.5 Emission Inventory Resource Center](#)

National Air Toxics Assessment - NATA

- EPA currently using the 2011 NEI to perform a National Air Toxics Assessment (NATA). Should be released later this year.
- NATA provides estimates of the risk of cancer and other serious health effects from breathing (inhaling) air toxics in order to inform both national and more localized efforts to identify and prioritize air toxics, emission source types and locations which are of greatest potential concern in terms of contributing to population risk.
- NATA used to set priorities for local assessments, improvements to emissions data, improvements to air toxics monitoring networks.

Summary

- There is a lot of data on facilities' environmental compliance status and emissions levels available online for public consumption and EPA is proposing to increase the amount of data available online.
- Noncompliance/deviations will be immediately detectable. It will no longer be necessary for an inspector to come on site and review records, he just has to login to the system.
- Submittal errors, suspect data, and data omissions previously difficult or impractical to detect can be determined and flagged for investigation.
- There will be more scrutiny of the data reported using automated routines that check for consistency with similar facilities.
- Trends due to operational changes such as aging control equipment or production mix can be determined and flagged for investigation.

Summary – cont.

- More data is available to the public with suitable structure for applying “data mining” techniques including
 - Statistical analysis techniques to “end-run” CBI protection and derive operational and production information from the data
 - “Watch dog” groups expanding and refining their current monitoring of their target industry
- EPA currently implementing e-reporting using a piecemeal approach that will result in duplicative reporting if states still require paper.
- Any EPA success in standing up their proposed structure will lead to further expanding monitoring and reporting requirements for all EPA regulations whenever possible; indeed, this rulemaking expansion can be seen as a consequence of prior electronic reporting successes.
- A corporate EMIS system can be “married” to the EPA electronic reporting system to make reporting more automated.

Thank You

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